Palvelualojen työttömyyskassa
Servicebranschernas arbetslöshetskassa

Member information and benefits register — Amended 5 November 2026

<table>
<tr><td>1. Controller and contact information</td><td>The Unemployment Fund of Service Union United PAM
Siltasaarenkatu 18 A
PO Box 93, 00530 Helsinki
kassa(at)pam.fi

Contact details for the Data Protection Officer:
Data Protection Officer
Service Union United PAM
PO Box 54, 00530 Helsinki
tietosuojavastaava(at)pam.fi</td></tr>
<tr><td>2. Purposes of processing personal data and legal basis for processing</td><td>The task of the Unemployment Fund is to arrange for its members the income security referred to in the Unemployment Security Act and the related maintenance allowances. In addition, the fund is responsible for arranging mobility allowance and change security in accordance with the law.

The processing of personal data in the fund's membership and benefits register is primarily based on the statutory obligation to carry out tasks pursuant to the Unemployment Security Act and the Unemployment Funds Act. In addition, the processing of personal data is based on an agreement or the consent given by the data subject.

<table>
<tr><th>Purposes of processing</th><th>Legal basis</th></tr>
<tr><td>Membership, management of membership and processing and collection of membership fees.</td><td>Agreement</td></tr>
<tr><td>Benefits-related advice and customer service.</td><td>Legal obligation / Agreement</td></tr>
<tr><td>Processing unemployment benefit applications and paying unemployment benefit.</td><td>Legal obligation</td></tr>
<tr><td>Actions related to the recovery of benefits (e.g. assessments, decisions, payment plans, cooperation with authorities).</td><td>Legal obligation</td></tr>
<tr><td>Reporting and statistics for operational development.</td><td>Legitimate interest</td></tr>
<tr><td>Member identification, management of access rights and access control.</td><td>Legitimate interest</td></tr>
<tr><td>Disclosure of personal data for scientific research where the disclosure relates to the assessment or development of the unemployment fund’s statutory duties.</td><td>Performance of a task carried out in the public interest (GDPR Article 6(1)(e)).</td></tr>
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<tr><td>3. Processed data and groups of data subjects</td><td>This description applies to the following data subjects:
• Members of the Unemployment Fund of Service Union United
• Former members whose data is retained in accordance with the retention period</td></tr>
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	• Benefit applicants and recipients
	  ○ Beneficiaries' guardians and minor children (increase for a child abolished on 1 April 2024, data is no longer collected, but it is retained in accordance with retention periods)
	  ○ Also includes people who are no longer members but have applied for or received benefits
	• Contacts whose calls are recorded
	
	Data processed
	The Unemployment Fund processes the personal data of its members in order to perform its statutory duties.
	
	• **Identification information:** name, personal identification number, membership number
	• **Contact information:** address, telephone number, email address
	• **Membership information:** membership start and end date, membership fee information
	• **Benefit information:**
	  ○ Account number
	  ○ Benefit applications, payment decisions, paid benefits, (increase for a child)
	  ○ Employment information (start and end date, working hours, termination)
	  ○ Salary information
	  ○ Employment policy statement from the employment authority
	  ○ Possible other benefits (e.g. home care allowance, pension)
	  ○ Tax information
	  ○ Pension and insurance information
	  ○ Enforcement information
	
	• **Information related to recovery:**
	  ○ amounts of benefits paid incorrectly
	  ○ recovery decisions and their grounds
	  ○ payment plans and payments
	  ○ possible enforcement information or Kela collection information
	• **Complaints and appeal information:** complaints, requests for correction, legal validity of decisions
	• **Call recordings:** recorded customer service calls
	• **Other information:** language of communication, gender, prohibition on disclosure of address
	• **Transaction history:** The Unemployment Fund creates and stores the data subject's transaction history, which may include information related to benefit applications, decision-making, customer service and other contacts.

4. Regular sources	The Unemployment Fund of Service Union United obtains information from multiple reliable sources to take care of its statutory responsibilities. Information is collected only to the extent necessary to process benefits and provide member services. **Personal data is obtained:** • directly from the members themselves • from Service Union United PAM for joint members • as transferred data from another unemployment fund • from employers in connection with application processing • from authorities and official registers to which the fund has legal access (Unemployment Security Act (1290/2002) Chapter 13 Section 1) **Regular data sources:** • Benefit applications and benefit processing (payment and benefit information) • The Social Insurance Institution Finland (Kela) (social benefits, benefit information) • Other unemployment funds (benefit information) • Posti (address information) • Digital and Population Data Services Agency (address information, suomi.fi ID) • Employment authorities (employment policy statements) • Incomes Register (salary, benefit and employment information) • Tax Administration (tax deduction information) • Finnish Centre for Pensions (work history) • Suomen Asiakastieto Oy (business information) • National Enforcement Authority Finland (payment bans)
5. Recipients or groups of recipients	**Processors of personal data** Member data is transferred to service providers e.g. for member communication and processing of member data. Agreements on the processing of personal data are concluded with all those who process personal data, and these persons are not entitled to process the data in any way other than what has been agreed for the provision of the service. **Disclosure of personal data to independent data controllers** **Recipients of data** The Unemployment Fund only discloses its members' data when it is necessary to perform statutory duties or when permitted or required by law. Personal data may be disclosed for scientific research purposes, for example to government research institutes, provided that the disclosure is based on a task carried out in the public interest and applicable legislation. **Regular recipients of data** Member data, such as personal identification number, contact information, membership fee information and benefit information, may be disclosed to the following authorities and entities: • Tax Administration • Incomes Register • Employment Fund • Financial Supervisory Authority

	• Finnish Centre for Pensions • The Social Insurance Institution Finland (Kela) • Ministry of Employment and the Economy • Digital and Population Data Services Agency • Service Union United PAM (for joint members) **Disclosure of information upon request** Information may also be disclosed to the following parties: • Another unemployment fund (e.g. upon transfer of membership) • Insurance and pension institutions • Foreign (EU/EEA) employment authorities • Social welfare offices • Social Security Appeals Board • National Enforcement Authority Finland • Police and courts
6. Transfer of personal data outside the EU or EEA	As a general rule, personal data is not transferred or disclosed outside the EU or EEA. However, some of our service providers or their support functions are located outside the EU/EEA. When processing involves the transfer of personal data to areas outside the EU or EEA, we use transfer mechanisms and safeguards in accordance with the General Data Protection Regulation to ensure an adequate level of data protection.
7. Automated decisions	The Unemployment Fund of Service Union United PAM does automated decisions as follows: Automated decision-making is used in the processing of follow-up applications and adjusted daily unemployment allowance applications. The system: • can process follow-up applications automatically, either in connection with the decision-making process or without a separate decision, if the conditions are met, • automatically pay adjusted daily unemployment allowances when the conditions are met, • and collect statistical information on the different stages of application processing The aim of automated decision-making is to speed up processing and improve the quality of service. The collected information is used for quality control and further development. Read more about automated decision-making here: https://www.palvelualojenkassa.fi/tietoa-meista/automaattinen-paatoksenteko.html

8. Rights of the data subject	**Right to access** The data subject has the right to check which data about him or her is stored in the register. **Right to correction of data** The data subject has the right to request that incorrect or incomplete data is corrected and completed. **Right to erasure and to be forgotten** The data subject has the right to request that personal data be erased. In some cases, this right may be limited due to mandatory legal obligations regarding data storage. **Right to transfer data from one system to another** The data subject may request personal data that the data subject has provided to the unemployment fund based on consent or agreement, in a machine-readable format. At the data subject's request, data may also be transferred to another data controller if it is technically possible and data-secure. **Right to restriction of processing** The data subject has the right to restrict the processing of his or her personal data in certain situations, for example when the accuracy of the data is disputed. **Right to object to processing** The data subject has the right to object to the processing of his/her personal data in certain situations. In the current case, we will analyze whether the legal grounds for the processing of the personal data are sufficient to continue the processing, or whether we will discontinue the processing of the data. **Right to withdraw consent** If the processing is based on the data subject's consent, the data subject has the right to withdraw his/her consent at any time. However, this does not affect the lawfulness of processing based on consent that took place before the consent was withdrawn. **Right to lodge a complaint with a supervisory authority** The data subject has the right to lodge a complaint with a supervisory authority if the data subject considers that the personal data has been processed in violation of data protection regulations. In Finland, the supervisory authority is the Data Protection Supervisor. More information: www.tietosuoja.fi. **Exercise of the data subject's rights** The data subject must submit their request in writing or electronically and provide sufficient identification information along with the request. The request for inspection and other requests related to rights are submitted to the Data Protection Officer of the Unemployment Fund of Service Union United.

9. Storage periods for personal data	We have defined the storage periods based on the purpose of the processing and applicable law: • **Membership data**: stored for ten (10) years after the membership has ended. • **Benefit data**: stored for ten (10) years after the last payment or decision after the membership has ended. • **Child data**: will be deleted ten (10) years after the child has turned eighteen (18) years. • **Call recordings:** stored for one (1) year. **Exceptional situations where the storage time is longer:** • **Recovery cases:** data will be stored for at least five (5) years from the end of the case. • **Complaints:** data will be stored for at least five (5) years from the date of validity of the decision. For complaints that result in an amendment of a decision, documents will be stored for at least 10 years from the date of the last payment or decision after the end of membership. • **Pending criminal proceedings:** data will be stored for at least five (5) years from the date of validity of the decision. • **Reporting and statistics:** 5 years from the date of preparation of the report or statistics. All members will have their data deleted when at least ten (10) years have passed from the end date or transaction date, provided that: • the data is no longer necessary for the original purpose of processing, and • there is no statutory obligation to store it. In some cases, data is stored longer if the processing is based on a statutory obligation.
10. The principles of data protection	The Unemployment Fund of Service Union United guarantees the data protection of personal data through comprehensive technical, physical and administrative safeguards. Personal data may only be processed by persons who are authorized to do so. The integrity and reliability of the data are ensured, and the data is available for its intended use when needed. Data protection is guaranteed from the time the processing of personal data is planned and during all phases of processing until the time the data is deleted in a data-secure manner. Through comprehensive agreements and instructions as well as sufficient controls, the Unemployment Fund of Service Union United will ensure that the parties working on behalf of the Unemployment Fund of Service Union United also process personal data in a data-secure manner.
11. Changes to the Data Protection Information	The controller is constantly developing its operations and reserves the right to make changes to this Data Protection Information.