

## PRIVACY NOTICE – PERSONNEL

**PRIVACY NOTICE – PERSONNEL****1. General**

This document describes the processing of personal data in Abloy Oy's human resources administration. This privacy notice provides the data subject and the supervisory authority with the information required by the European Union's General Data Protection Regulation (GDPR 679/2016).

Privacy notices for M365 (Microsoft office software package) that ASSA ABLOY Group uses can be accessed through ASSA ABLOY's intranet page.

**2. Controller and contact details**

Name: Abloy Oy

Postal address: Wahlforssinkatu 20, 80100 Joensuu, Finland.

Telephone (exchange): +358 20 599 2501

Business ID: 0774324-5

Email address: [privacy@abloy.com](mailto:privacy@abloy.com)

This email address is to be used only for addressing matters related to data protection. For all other matters, the correct contact information can be found from [www.abloy.com](http://www.abloy.com).

**3. Whose data is processed?**

The data subjects are individuals who are or have been in an employment or managerial relationship with Abloy Oy and, with limited information, temporary agency workers and consultants.

**4. What is the purpose and legal basis for processing personal data?**

The processing of personal data is necessary in order to fulfil the data controller's statutory obligations, to implement an employment or management contract to which the data subject is party, and to fulfil the legitimate interests of the data controller.

The processing of personal data of temporary agency workers and consultants is necessary based on the legitimate interests of the data controller in order to fulfil the service agreement.

The data controller ensures that processing based on legitimate interests is correctly proportional to the interests of data subjects and is in line with their reasonable expectations.

Personal data is used to maintain information about data subject's employment relationship with Abloy Oy, exercise the employer's supervisory and direction rights, process and pay compensation for travel and other expenses, forward calls and contact, maintain records of working hours,

provide occupational healthcare services, manage skills, training and employee benefits, pay salaries, maintain contact with the authorities, compile statistics, process requests for certificates and salary information, manage equipment and define information about the access rights to data systems required by employees.

Personal data groups of the data subject	Purpose of processing a data group	Basis of data processing
Basic personal data	Identification of individuals, granting user and access rights, mailing (e.g. salary certificates), contact (e.g. in emergencies), and statistics	Contractual and statutory obligations  Legitimate interest of the data controller. Part of the information is necessary to enable the controller to publish your name, photo (if applicable), video (if applicable), and title on ASSA ABLOY's intranet, webpage and in external communication during employment
Work contact information	Carrying out work-related tasks via email and/or by telephone	Contract  Legitimate interest of the data controller. The information is necessary to enable the controller to manage an effective protocol in case of emergency situations and crisis management and to enable the controller to publish your business contact details on the controller and ASSA ABLOY's intranet, webpage and in external communication during employment
Employment information	Basic employment information for payroll accounting, paying compensation for travel and general expenses and maintaining records of working hours. Background information for calculating pensions, collecting employee association fees and compiling statistics	Contractual and statutory obligations

Personal data groups of the data subject	Purpose of processing a data group	Basis of data processing
Photo, video and audio of an employee	Usage of photo, video and audio for editorial, commercial, advertising and information purposes.	Contract
Investigations carried out at the beginning of employment (internal recruitment)	<p>Study certificates and other important documents considering the position are verified.</p> <p>The occupational healthcare service provider assesses the applicant's state of health.</p> <p>Credit information is checked in positions where the applicant is required to show special trust and direct financial responsibility.</p> <p>A basic or concise security clearance must be applied for employees who are in position in which they have access to premises that are important in security perspective or to confidential information. In addition, a security officer license is applied, if the employee is carrying out security tasks requiring certification in his/her job. In addition, an aptitude test can be conducted.</p>	<p>Legitimate interest of the data controller. The information is necessary in order to succeed in the recruitment process and to assess the applicant's suitability.</p> <p>The processing of credit information during the recruitment process is based on the applicant's consent.</p>
Induction information	Verifying introduction regarding the employee's work and working conditions, the correct use of equipments and safe working methods	Legitimate interest of the data controller. Maintaining introduction information is necessary to ensure that personnel has sufficient knowledge in the beginning of their employment to perform their working tasks.
IT user information and information about equipment and access rights	Management of equipment and access rights	Legitimate interest of the data controller. By recording IT user information, information about equipment and access rights, it is ensured

Personal data groups of the data subject	Purpose of processing a data group	Basis of data processing
		that personnel has adequate equipment and access rights with respect to their working tasks. Additionally, the access rights' traceability is ensured.
Salary information and payroll accounting results	Payroll accounting, taxation, pensions, statistics and other official purposes	Contractual and statutory obligations
Information about absences and holidays	Management and monitoring of absences and holidays	Contractual and statutory obligations
Working hours registrations	Working hours monitoring and hourly registrations for payroll accounting	Contractual and statutory obligations
Information about substitute arrangements	Defining the right to substitutes and carrying out tasks during substitute arrangements	Legitimate interest of the data controller. With substitute information, the employer ensures that working tasks are assigned to the right persons during the absence of an individual.
Exposure information regarding carcinogenic working methods and mutagenic substances and compounds.	Maintaining a list of employees exposes to carcinogenic working methods and mutagenic substances and compounds and reporting the information gathered to the ASA register.	Statutory obligation
Discussions of the ability to work	Assessing the ability to work after an extended absence	Legitimate interest of the data controller and statutory obligation. With discussions of the ability to work, it is ensured whether something can be done at the workplace in order to prevent falling sick.
Performance development and Succession planning	Defining task-specific goals and preparing a competence development plan and follow up the realization of the plan	Legitimate interest of the data controller. An individual's work and know-how can be improved and his/her personal goals achievement followed based on performance appraisals.

Personal data groups of the data subject	Purpose of processing a data group	Basis of data processing
Job descriptions	Describing the content of tasks and defining the difficulty of tasks in accordance with the collective agreement	Legitimate interest of the data controller. The job requirements, as provided in the collective bargaining agreements, affect the salaries directly and are defined in the job descriptions.
Culture and exercise benefits	Granting and managing employee benefits	Agreement and the legitimate interest of the data controller. Personal data is required in order to grant the benefits to the right persons.
Work- and training-related travel and expense reports	Monitoring working hours during travel and paying travel expense compensation, daily allowances and other expense compensation	Legitimate interest of the data controller and statutory obligation. In order to ensure the validity of the payment of travel time pay, daily allowance and reimbursement of expenses.
Skills (job qualifications, educational background, trainings during the employment and performance information)	<p>Securing the skills required in business activities and tasks</p> <p>To be able to check that necessary trainings have been completed.</p>	<p>Contract</p> <p>Legitimate interest of the data controller. Maintaining information related to skills is required in order to ensure adequate know-how in different working tasks and substitution. To enable the controller to publish competences, where necessary, on the controller and ASSA ABLOY's intranet and in external communication during the employment.</p>
Contact information of the next of kin	Establishing contact in the case of an accident or illness	Protecting the vital interests of data subjects
Feedback from employees	The employer may collect feedback from employees e.g. in order to improve processes and to measure job satisfaction and well-being at work	Legitimate interest of the data controller to improve processes and operation and to ensure the job satisfaction and well-being at work of employees.

Personal data groups of the data subject	Purpose of processing a data group	Basis of data processing
Exit interview information	When an employee is leaving, the employer collects information from the leaving employee with an interview to help the employer in developing its activities and in enhancing employer image	Legitimate interest of the controller to develop its activities and to enhance employer image
Employee information relating to personnel webshop.	Delivery, handling, archiving the order	Contract

The data controller does not carry out any automated decision making.

## 5. What personal data is processed?

### Abloy job applicants and employees

Personal data group	Data content
Basic personal data	First names, calling name, last name, telephone number (work/home), address, email address (work) Personal identity code, date of birth, ID number (work), gender, native language, nationality. Contact details of a next of kin provided by the person Date of joining the company Photo and/or video (if applicable)
Work contact information	Tasks, work mobile number, extension and substitute arrangements
Employment information	Bank account, tax card, pension insurance, employee association fee information, basic employment data, fringe benefits, statistical groups, posting data, location and supervisor
Photo, video and audio of an employee	Marketing photos, marketing videos and audio, webinars, printed materials and electronic materials, other photos and video, written and verbal testimonials and other Works.
Exposure information regarding carcinogenic working methods and mutagenic substances and compounds.	Names of the exposed employees, personal identity code, occupation and the basis for the exposure information.
Investigations carried out at the beginning of employment	References, state of health, aptitude test, credit information, security clearance and verification of identity
Introduction training information	Introduction completed and approved

Personal data group	Data content
Information about equipments and access rights	Information about given and returned equipments, access rights and their approval
Salary information and payroll accounting results	Euro-denominated hourly and/or monthly salary used as the basis of salary payments Suggestion and invention compensation paid, travel time, alarm and on-call duty compensation, non-recurring items and euro-denominated values of fringe benefits Realised hours and amounts in payroll accounting (salary transactions, gross and net salary, deductions and manual corrections)
Information about absences and holidays	Sick leave, parental leave, study leave, alternation leave and other absences affecting payroll accounting, accumulated holidays and holiday periods
Discussions of the ability to work	Discussion date, estimate of factors leading to absence from work, opportunities to prevent such factors and approval
Working hours registrations	Background settings for working hours registrations, registered working hours and resulting working hours
Information about substitute arrangements	Substitutes during holidays and absences
Educational and work history	Education, studies, previous work experience and certificates
Performance appraisals	Content and date of performance appraisals, goals and competence development plan
Job descriptions	Most recent revision, position and its content
Culture and exercise benefits	Granted benefits, validity date and information about specific benefits
Skills	Skills in tasks, goals and realization of goals.
Telephone directory of the ASSA ABLOY Group	First and last names, title, company, location of company, address of company, work telephone number, Skype address, department, skills, email, language and photo.
Feedback from employees	The level of satisfaction, open feedback. Additionally the employee's name and email address, unless the feedback is collected anonymously.
Exit interview information	Feedback from induction training, reasons for leaving, overall job and workplace satisfaction
Employee information relating to personnel webshop.	Name, contact information such as address, email address, phone number and billing and shipping address.

## Temporary agency workers and consultants

Personal data group	Data content
Basic personal data	First names, calling name, last name, date of joining the company
Work contact information	Tasks, work phone number, work email address
Information about equipments and access rights	Information about given and returned equipments, access rights and their approval
Information about absences and holidays	Sick leave, parental leave, study leave, alternation leave and other absences affecting payroll accounting, accumulated holidays and holiday periods
Working hours registrations	Background settings for working hours registrations, registered working hours and resulting working hours
Telephone directory of the ASSA ABLOY Group	Title, company, location of company, address of company, work telephone number, Skype address, department, email, language

## 6. How is personal data collected?

The data stored on data subjects is data provided by the data subjects themselves. Those data subjects who have access rights to the personal data register system can maintain their own basic personal data.

The basic personal data of temporary agency workers and consultants are received from respective employers.

In addition, data is maintained and updated using data produced by the authorities, partners and the data controller during the employment relationships of data subjects. When data is collected from sources other than data subjects, the consent of each data subject must be requested for the collection of data in accordance with the Act on the Protection of Privacy in Working Life (759/2004).

However, no consent is needed when an authority transfers data to Abloy in order to carry out a task defined in the legislation or when the employer obtains credit information or information from criminal records in order to identify the reliability of an individual. If Abloy identifies the reliability of an individual, it will notify data subjects of this beforehand.

If data is collected from sources other than data subjects, Abloy will notify data subjects of the data obtained before it uses it to make decisions on employees.



## 7. Who will the data be transferred to?

### Abloy employees

Recipient	Purpose of the disclosure
Tax administration	Paying taxes
Social Insurance Institution (Kela)	Paying compensation for sick, family and other leave
Employee associations	Paying employee association membership fees
Execution authorities	Paying execution costs
Insurance broker	Processing the company's insurance data
Insurance companies	Calculating employee pensions and processing compensation to be paid for accidents
Unemployment office services	Alternation leave notifications
Occupational health and safety authority	Occupational health and safety inspection records
Occupational healthcare	Maintaining health records
Security services	Maintaining facility security
Online salary calculation operator	Electronic payslips for employees
Telecom operator	Mobile services, exchange services and internet subscriptions
Travel agency	Booking and invoicing work travel
Exercise and culture benefit provider	Management of employee benefits
Printing shop	Address information for the personnel magazine
Training service provider	Personnel training
Patent office	Processing invention reports
ASSA ABLOY Group	Salary information about managerial relationships and specifications to personnel reporting
Telephone directory of the ASSA ABLOY Group	Contact within the Group
Service providers	Maintenance and support tasks for data systems
Central statistical office of Finland	Statistics
Confederation of Finnish Industries	Statistics
Finnish Institute of Occupational Health	Registration of the ASA-register information.
Staff gifts' provider	Providing staff gifts
SD Worx	Payroll services

**Temporary agency workers and consultants**

Recipient	Purpose of the disclosure
ASSA ABLOY groups internal phonebook	Communications inside the Group

**8. Is personal data processed outside the European Union?**

Abloy Oy transfers and discloses personal data to the ASSA ABLOY Group outside EU / EEA area for Group control purposes and for the organization of the Group's operations.

The service provider of the employees' travel booking and travel expense services may give access to personal data of the services to its support organizations located in India, the U.S.A. and Australia.

The service provider of the HR system may give access to personal data processed in the system to its support organization located in the U.S.A.

When transferring data outside the EU or EEA, we use standard contractual clauses approved by the EU Commission in order to protect the data properly. For further information, please visit EU Commission's [web site](#).

**9. What are the storage periods for personal data?**

The data collected in the register will be kept for as long as necessary, and to the extent necessary, for fulfilment of the original or compatible purposes for which the personal data was collected.

**10. What rights do data subjects have?****Right of access**

The data subject is entitled to obtain confirmation from the controller as to whether the personal data of the data subject is being or has been processed.

If the data controller processes the personal data of the data subject, the latter is entitled to the information of this document, as well as to a copy of the personal data that is being or has been processed.

If a data subject makes a request electronically and has not requested any other form of delivery, the data will be provided in a generally available electronic format that is compatible with secure delivery of the data.

### **Right to correct or erase data**

Data subjects have the right to request the controller to correct or erase their personal data.

Under certain circumstances, data subjects have the right to request processing of their personal data to be restricted, or to otherwise object to the processing of data. In addition, data subjects may request the transfer of data submitted by the data subjects themselves in a machine-readable form based on the General Data Protection Regulation.

### **Consent withdrawal**

If the processing of personal data is based on the data subject's consent, the data subject has the right to withdraw their consent at any time.

### **The right to object to the processing**

The data subject has the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data when the processing is based on the legitimate interest of the controller or a third party.

## **11. How can data subjects exercise their rights?**

In all matters involving the processing of personal data, data subjects have the right to contact the data controller.

All requests mentioned in the present document must be submitted using above contact addresses of the controller.

Data subjects also have the right to file a complaint with the supervisory authority if their personal data is or has been processed unlawfully.

## **12. How is personal data protected?**

Abloy Oy processes personal data safely and in compliance with the applicable legislation. Protection of personal data by Abloy Oy is adequate both technically and organisationally.

The data is stored in locked premises that are accessible only to authorised persons. Personal data stored in the systems is accessible only to pre-designated persons who need the information for work-related tasks. IT environments are protected by adequate firewalls and other forms of technical protection.

With regard to the processing of personal data, Abloy Oy's employees and other persons must abide by their obligation of secrecy and must handle personal data confidentially.

### **13. Updating the privacy notice**

We will update and change this privacy notice when necessary. We will notify you of such changes at Abloy's www-site <https://www.abloy.com/privacy>.

This privacy notice has been made: 22<sup>nd</sup> of May 2018.

This privacy notice has been updated: 18<sup>th</sup> of December 2020, 31<sup>st</sup> of March 2021, 3<sup>rd</sup> of May 2021, 30<sup>th</sup> of September 2021, 18<sup>th</sup> of July 2023 and 11<sup>th</sup> of September 2023.