

## Privacy notice

Vastuu Group Ltd's Valtti Card Service  
(Last update 26 September 2022)

### 1. Controller and contact person of the register

Vastuu Group Oy (Business ID 2327327-1)  
Tarvonsalmenkatu 17 B  
02600 Espoo, Finland

Data Protection Officer's contact details:

Email	dpo@vastuugroup.fi
Regular mail	Vastuu Group Ltd Data Protection Officer Tarvonsalmenkatu 17 B 02600 Espoo, Finland

### 2. Data subjects

Data subjects are the card holders of Valtti Cards issued by Vastuu Group Ltd (the "Supplier"). Card holders are the employees, managers, trainees (not working on an employment contract), or volunteer workers of Supplier's customer.

### 3. Basis for and purpose of personal data processing

The legal basis for personal data processing is the legitimate interests of the controller and related processing purposes are described below.

Valtti Card is a remote-readable RFID card linked to the employment, which can be used e.g. as a photographic identification card for use at construction sites and shipyards in accordance with the Occupational Safety and Health Act (2002/738).

The employer of the card holder orders the Valtti Card from the Supplier's online service. The card orderer is identified electronically.

The Valtti Card can only be ordered for an employee whose information the employer has first entered into the Employee Management service. When ordering a card, the card holder's information is transferred to the Valtti Card service. The card holder's registration in the Tax Administration's tax number register is checked directly from the Tax Administration when ordering the card.

The PIV application of the Valtti card chip stores the cardholder's person certificate, which contains the personal data described in section 4. The person certificate can be read with a compatible card reader device if the cardholder has first given the card reader the PIN code of their card. If the PIN code is repeatedly entered incorrectly, the PIV application is locked so that it cannot be opened anymore.

The card holder shall verify their Valtti card within a specified timeframe by identifying themselves in the Supplier's online service. At the same time, the Valtti card's PIN code is handed over to the card holder. The card holder can later check the card information and PIN code in the same online service. An invitation to verify the card is sent to the card holder by e-mail and/or text message.

The card holder's personal data is stored in the supplier's electronic Valtti Card register, from which third parties with access rights can retrieve the card holder's personal data for the permitted uses described in this privacy notice.

#### 4. Which personal data is collected and from what sources?

We collect the following personal data about the card holder from the employer that is the Supplier's customer:

- the card holder's first name, last name, nationality, Finnish personal ID number ("henkilötunnus") or similar foreign number, tax number, date of birth, photo, email address, mobile phone number
- employer's name, Business ID or similar foreign company registration number, country of registration
- Valtti Card's delivery address

The personal ID is used exclusively to identify the card holder when verifying the Valtti Card.

The card holder's e-mail address, mobile phone number and delivery address are used exclusively to deliver the Valtti Card and its PIN code to the card holder.

In connection with the production of the Valtti Card, we add the following information to the personal data received from the employer:

- card type, number, barcode, UUID, ISO 14443 UID and other technical identifiers
- a person certificate that is stored on the Valtti Card with the following information: first name, last name, citizenship, tax number, date of birth, employer's name, Business ID or similar foreign company registration number and country of registration, card identifiers, card validity period
- a card certificate that is stored on the Valtti Card, which shows that the card was manufactured by Vastuu Group Oy
- Valtti Card's PIN code
- Valtti Card's validity period
- picture of the card (pdf)
- card status and its change information
- card verification date and card holder identification method

When ordering a Valtti card, we collect the following information in our customer register and service logs:

- the name of the person who made the order and the time and method of identification
- placed and cancelled orders and their date
- order status
- delivery address of the card
- billing information

#### 5. Regular disclosure and transfer of personal data

Customers who use Vastuu Group Ltd's services can search and download the card holder's personal data in their own information systems when the card holder works or plans to work at the customer's construction site, shipyard or other work site. In connection with the data search, the information in the Valtti Card register can be attached to the card holder's qualification information stored in the Taito Competence register and other personal data reported by the employer in the Employee Management service to the extent that the customer has a legal basis for processing such additional information.

The card holder's personal data may only be retrieved and processed for the following purposes:

- preparation of a list of persons working at a shared construction site or a shipyard area pursuant to section 52b of the Occupational Safety and Health Act
- verification of the validity of the photographic ID required by section 52a of the Occupational Safety and Health Act and verification of the registration of the employee in the tax number register
- implementation of work site orientation and other measures required in the Occupational Safety and Health Act from the main contractor or the main implementer of the building site or from the party using the primary decision-making power at the shipyard area in order to ensure and promote safety at work

- preparation of monthly employee reports to the Finnish Tax Administration as required in the construction sector by section 15b of the Tax Procedure Act
- fulfilment of other statutory and contractual obligations of the party
- implementation of access control at a construction site, a shipyard, or other work site
- verification of professional competencies of a person participating in worksite orientation at a construction site, a shipyard, or other work site
- verification of the validity of professional competencies required for a work task
- ensuring compliance of the activities with occupational safety regulations
- supervision at a construction site, a shipyard, or other work site
- ensuring compliance with the contracting party's own quality, operating, or similar systems
- ensuring that the activities of contractors and independent workers operating at the contracting party's building site or other work site comply with the contracts
- other purposes subject to the data subject's explicit consent.

The disclosure of personal data to another controller will be implemented by using the application interfaces provided by the Supplier so that the transfer of employee data either requires that Valtti card IDs be read or there is another method to recognize the contractual relationship between the employer/data subject and the other controller and the purpose for which the data will be used.

We may disclose data contained in the Valtti Card register to the authorities based on the mandatory requirement of a competent authority, or when we consider the inquiry of the authority to be justified in order to investigate suspected misuse of our services.

We may collect and disclose to third parties numbers of issued and valid Valtti Cards per company, group of companies, industry sectors or using other segments as a grouping criteria. Individual card holders cannot be identified from such numbers.

In the production of the Valtti Card service, we use subcontractors located within the European Economic Area (such as data centers), and can also transfer personal data to such subcontractors for producing the service.

## 6. Transfers outside the EU and EEA

Personal data is not transferred outside the EU or the European Economic Area.

## 7. Retention periods for personal data

The Valtti Card register stores the information about the issued Valtti Card for 20 years from the end of the calendar year during which the validity period of the card has ended, or as long as references to the Valtti Card are stored in Vastuu Group's customer's Building site register or other register.

Valtti Card order information is kept for 2 years after the employer has ceased to be a customer.

The card numbers of expired Valtti cards (without personal data) are permanently stored in the list of closed cards.

## 8. Rights of data subjects

This Privacy Statement contains information on how your personal data is processed in the service. If you need more information about the processing of your personal data, please contact the controller using the above contact information.

As a data subject, you have the right to access your personal data. You can exercise this right by contacting the controller using the above contact information.

If there are errors in your data, you can request correction of your data from the controller.

In the situations defined in the General Data Protection Regulation, you have the right to demand the deletion of your personal data, to object to the processing of your personal data, to request the restriction of the processing of your personal data, or to request the transfer of your personal data from one system to another. You can exercise these rights by contacting the controller.

If you consider the processing of your personal data to be illegal, you can file a complaint about the processing of personal data to the competent authority, which is the Office of the Data Protection Ombudsman (<https://tietosuoja.fi>).

## 9. Data security

The information security management system of the controller is ISO 27001 certified. Maintenance and support services are implemented in accordance with the information security policy of the controller. Access to personal data is limited only to designated persons who need to process personal data in their work. Each user has their own username and password. Personal data is stored in databases and information systems located in the European Economic Area, where appropriate technical and organizational means are used to protect personal data against abuse and disclosure.

## 10. Contacts

If you have questions regarding this privacy notice or you wish to exercise your rights, please contact controller's Data Protection Officer by using the above email or postal address.

## 11. Changes

The controller may change this privacy notice from time to time without a separate notification, and the changes that have taken place will be announced at the beginning of the data protection statement with a "last update" notice.