

Communication and Stakeholder Engagement Privacy Notice

1 Data Controller and Data Protection Officer

Seafarer's Pension Fund

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2 Purpose and Legal Basis of Processing

Personal data is processed to facilitate communication and interaction between the Seafarer's Pension Fund (hereinafter referred to as the "Pension Fund" or "Data Controller") and its stakeholders.

The purpose of the processing is to provide seafarers, shipping companies, and other stakeholders with clear and sufficient information about the seafarers' pension system as part of the statutory earnings-related pension scheme.

The processing of stakeholders' personal data for communication purposes is based on:

- the data controller's legitimate interest, such as the mailing of published materials
- the data subject's consent, for example, when subscribing to a newsletter or printed publication.

3 Data Subjects and Categories of Data

Data subjects include:

- Active seafarers
- Retired persons receiving a seafarer's pension
- Employees of shipping companies
- Representatives of the maritime sector and the earnings-related pension system
- Public authorities
- Members of Parliament

The personal data processed may include, for example:

- Name
- Contact details (email address, postal address)
- Represented organization and position
- Language
- Information about communication channels used (e.g. newsletter subscription or printed publication)
- Additional information provided by the data subject.

4 Regular Sources of Data

Data is obtained from the following sources:

- The data subject
- The data subject's employer
- Public sources and representatives of stakeholder organizations.

5 Data Disclosures and Transfers

Data may be disclosed to the following recipients:

- Communication and publishing service providers (e.g. newsletter and magazine distribution)
- Mailing and printing service providers.

The Pension Fund does not transfer personal data outside the EU or EEA.

6 Data Retention Period

Personal data is retained only for as long as it is necessary for communication and interaction purposes. The data subject may withdraw their consent (e.g. newsletter subscription) at any time, in which case the data will be deleted without delay. Data subjects may request removal from the recipient list of printed publications by contacting [info\(at\)merimieselakekassa\(dot\)fi](mailto:info(at)merimieselakekassa(dot)fi).

7 Rights of the Data Subject

The data subject has the right to request information on whether the Pension Fund processes their personal data. They also have the right to receive a copy of their personal data and verify its accuracy. The Pension Fund is obligated to correct any inaccurate data.

In certain cases, the data subject may object to the processing or request that it be restricted. However, these rights may be limited when data is processed based on a legal obligation.

The Pension Fund retains personal data in accordance with statutory retention periods and cannot delete data during that time. Once the retention period ends, the data will be deleted automatically without a separate request.

No automated decision-making or profiling is used in connection with personal data processing.

The data subject may withdraw their consent where processing is based on consent.

8 How to Submit a Data Request

The data subject may submit a request to access or otherwise exercise their rights under the GDPR primarily by using strong identification via the LOKI online service at [loki\(piste\)merimieselakekassa\(piste\)fi](https://loki(piste)merimieselakekassa(piste)fi). The Pension Fund will respond no later than one month after receiving the request. In certain cases, this period may be extended by up to two months, in which case the data subject will be informed accordingly.

9 General Description of Technical and Organisational Safeguards

The Pension Fund processes all personal data in accordance with applicable laws. Data security is ensured through both technical and organisational measures, including:

- Continuous monitoring and development of data protection and security
- Appropriate security of IT systems and electronic processing tools
- Access rights based on individual user credentials, with usage monitored
- Role-based access granted on a least-privilege basis
- Statutory duty of confidentiality applies to all users
- Users are trained and instructed on data protection regularly
- Data is stored in secure facilities with access control
- Data is disclosed only to legally authorised parties and in a secure manner.

Any processors acting on behalf of the Pension Fund follow the same principles and obligations for personal data protection.

10 Right to Lodge a Complaint

The data subject has the right to lodge a complaint with the Data Protection Ombudsman if they believe their personal data has been processed unlawfully.

7.7.2025

Public

The data subject may refer the matter to the Data Protection Ombudsman if they consider that the processing does not comply with data protection legislation.

Office of the Data Protection Ombudsman

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Updated: 2 June 2025