

Privacy Notice

Statutory Earnings-related Pension Provision

1 Data Controller and Data Protection Officer

Seafarer's Pension Fund
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2 Purpose and Legal Basis of Processing

The Seafarer's Pension Fund (hereinafter "the Fund"/"the Pension Fund") administers statutory earnings-related pension security under the Seafarer's Pensions Act (1290/2006, "MEL") and processes personal data for tasks specified in the MEL. Processing also occurs to comply with sanctions legislation (Act 659/1967).

Processing purposes include:

- Pension application
- Establishing pension eligibility
- Pension determination and payment
- Pension liability calculation and contribution assessment
- Advising insured persons
- Pension debt collection
- Official statistics and research
- Compliance with regulatory instructions

Processing may also be based on consent, especially for planning and implementing rehabilitation. Consent may be withdrawn at any time without affecting the legality of prior processing, though withdrawal may delay handling.

3 Description of Data Subjects and Categories of Personal Data

The Pension Fund processes personal data of the following categories of individuals:

- Employees engaged in work as defined in the Seafarers' Employment Contracts Act, whose statutory pension coverage is or has been arranged through the Pension Fund (hereinafter also referred to as "insured persons")

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- Individuals who apply for or receive a pension, rehabilitation allowance, or other benefits from the Pension Fund

The personal data processed includes, among others:

Basic and contact information:

- Name, date of birth, personal identity code, preferred language of communication, nationality, occupation, date of death
- Address, phone number, email address
- Contact persons and legal guardians, along with their contact details

Employment-related information:

- Name of employer
- Duration and earnings information of the employment
- Code related to the seafaring employment
- Insurance contribution rate

Information related to the application for pension or other benefit:

- Contacts made by the individual and preliminary pension calculations
- Information required to establish pension entitlement
- Health information provided in applications related to the assessment of disability
- Family relationship information: details of guardians, children, and data concerning marriage or registered partnership

Information related to the determination of pension or other benefit:

- Retirement age, accrued pension
- Information on other social benefits affecting the pension
- Other relevant data affecting the amount of the pension

Information related to the payment of pension or other benefit:

- Bank account information
- Tax withholding information
- Amount of pension
- Information related to debt collection

- Power of attorney for managing pension matters
- Other beneficiaries

Information related to the individual's interactions and advisory services:

- Personal data contained in submitted documents
- Online and email communications where the individual is a party
- Identification and usage data for online and electronic services
- Preferred method for electronic services.

4 Sources from which the Pension Fund Receives Personal Data

The Pension Fund receives personal data from the following parties that, under law, have the right or obligation to provide such information to the Pension Fund. The Pension Fund also obtains information directly from the insured person, for example, through a pension or benefit application.

Regular sources of information:

- The insured person's employer
- The Seafarer Register maintained by Traficom
- Another pension or insurance institution
- The Finnish Centre for Pensions (Eläketurvakeskus)
- The Social Insurance Institution of Finland (Kela)
- Social welfare authorities
- Unemployment funds
- Employment authorities
- Doctors, hospitals, health centres
- Providers of rehabilitation services
- Banks
- The Finnish Tax Administration
- The Digital and Population Data Services Agency
- The Trade Register
- Enforcement authorities

- Sanctions lists maintained by international and national organisations (e.g. the EU, UN, OFAC).

5 Disclosure of Personal Data

The Pension Fund discloses personal data only when there is a statutory right of access to the data, or when the data subject has given their consent. Data may be disclosed to, among others, the following recipients:

- The Finnish Centre for Pensions (Eläketurvakeskus)
- The Patient Insurance Centre, the Finnish Motor Insurers' Centre, and other accident insurance institutions
- The Social Insurance Institution of Finland (Kela)
- The insured person's employer
- The insured person's bank
- The Finnish Tax Administration
- Unemployment funds
- Employment authorities
- Social welfare authorities
- Enforcement authorities
- Providers of rehabilitation services
- The Pension Appeal Board
- The Insurance Court

The Pension Fund may use subcontractors in the processing of data and may transfer data to them only to the extent necessary for service delivery. Subcontractors process data on behalf of the Pension Fund and are required to comply with applicable data protection legislation.

The Pension Fund uses shared information systems with other actors in the earnings-related pension sector, such as the earnings register and the pension decision register. The technical maintenance of these systems is the responsibility of Arek Oy. The Seafarer's Pension Fund also uses the shared KuntoutuNET online service provided by Arek Palvelut Oy. Each pension provider is the controller of its own data, and the Arek companies act as processors of personal data.

6 Transfers Outside the EU/EEA

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

7 Rights of the Data Subject

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

In certain cases, the data subject may object to the processing of their personal data or request that the processing be restricted. However, these rights may be limited when the Pension Fund processes data based on a statutory obligation.

The Pension Fund retains personal data in accordance with statutory retention periods and cannot delete data during the applicable retention period. The data will be deleted automatically after the retention period has ended, without the need for a separate request.

The Pension Fund does not use automated decision-making or profiling in pension processing or payment.

The data subject may withdraw their consent, if the processing is based on consent.

8 How to Submit a Request

Requests should preferably be submitted via strong identification through the LOKI online service:

`loki(piste)merimieselakekassa(dot)fi`

A response will be provided within one month. This may be extended by two months, if necessary, in which case the data subject will be notified.

9 Data Retention

The Pension Fund is required to retain documents related to the administration of pension coverage under the Seafarer's Pensions Act (MEL) in accordance with the provisions of the Archives Act (831/1994). If the National Archives has not designated the documents listed below for permanent retention, the Pension Fund must retain them as follows:

- a. Documents concerning the validity and termination of insurance, as well as other documents necessary for the arrangement, administration, and contribution determination of the insurance, for the duration of the insurance coverage and ten calendar years thereafter;

- b. Applications related to pension or rehabilitation matters, medical certificates, rehabilitation plans, and other documents concerning rehabilitation or the applicant's health, work ability, functional capacity, or rehabilitation potential; other documents necessary for the granting, processing, or payment of a pension or rehabilitation benefit; and the decision and calculation related to the pension or rehabilitation matter, for the lifetime of the insured person and five calendar years thereafter;
- c. Documents necessary for the granting, processing, or payment of survivors' pensions, and the decision and calculation concerning the survivors' pension, for the duration of the payment of the survivors' pension and five calendar years thereafter;
- d. Documents necessary for the collection of insurance contributions, until the end of the collection process and five calendar years thereafter; and
- e. Documents related to appeal matters for 50 years, unless they are required to be retained longer under items (a)–(d); the retention period for appeal documents begins once they have been returned to the Pension Fund from the appeals body.

10 Technical and Organisational Safeguards

The Pension Fund processes all personal data in accordance with applicable legislation. The security of personal data is ensured through both technical and organisational safeguards:

- The protection and security of personal data is continuously monitored and developed.
- Appropriate data security is ensured for the IT systems in use, including the testing environment and other electronic processing tools.
- Access to IT systems is based on personal user credentials, and usage is monitored.
- Access rights are granted based on work duties and follow the principle of least privilege.
- Users are subject to a statutory obligation of confidentiality.
- Users receive instructions on personal data processing and are regularly trained.
- Personal data is stored in secured facilities subject to access control.
- Data is disclosed only to parties legally entitled to receive it, and even then, only in a secure manner.

Processors acting on behalf of the Pension Fund are required to follow the same principles and obligations in processing and protecting personal data as the Pension Fund itself.

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11 Right to Lodge a Complaint

The data subject has the right to lodge a complaint with the Data Protection Ombudsman if they consider that their personal data has not been processed lawfully.

The data subject has the right to bring the matter before the Data Protection Ombudsman if they believe that the processing of their personal data does not comply with applicable data protection legislation.

Office of the Data Protection Ombudsman

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