PRIVACY POLICY STATEMENT OF THE SEAFARERS' PENSION FUND

4.0	Conformal Description
1. Controller	Seafarers' Pension Fund
	Kanavaranta 9 FI-00160
	Helsinki
	Tel. +358 (0)10 633 990
	E-mail: info@merimieselakekassa.fi
	Contact person for register-related matters:
	Marina Paulaharju
	Kanavaranta 9 FI-00160 Helsinki
	Tel. +358 (0)10 633 990
	E-mail: marina.paulaharju@merimieselakekassa.fi
2. Data Protection	Varvara Zhilibovskaya
Officer	Tel. +358 (0)10 633 990
	E-mail: tietosuoja@merimieselakekassa.fi
3. Name of Personal	Tenancy Register
Data Register	, ,
4. Legal basis and	The processing of personal data within the Tenancy Register of
intended purpose	the Seafarers' Pension Fund is based on contractual relations.
for the	
processing of	Personal data is primarily processed for the purpose of
personal data	establishing, maintaining and managing the tenancy. For the
·	purposes of establishing tenancy, the credit information and
	payment capacity of the registered person is checked from
	customer databases. Additionally, Vuokraturva Oy processes the
	personal data of rental applicants in connection with the service
	agreement.
	ag. cement
	Intrum Oy is a co-operative partner of the Seafarers' Pension
	Fund, providing recovery services related to rental invoices for
	residential and commercial properties.
	residential and commercial properties.
	The address of the rental property is used in customer
	communications (Albatrossi customer magazine).
	communications (Authorst Customer magazine).

5. Personal data	Personal data categories to be processed within the Tenancy
categories to be	Register
processed	Name information
	Personal identity code
	Contact information
	Bank account information
	Rental payment information
	Credit information
6. Sources of	The Seafarers' Pension Fund receives personal data for its
information	Tenancy Register from the customers themselves, as provided on
	the rental application form, and from Vuokraturva. Additionally,
	the Seafarers' Pension Fund receives personal data from general
	customer databases. For example, the Seafarers' Pension Fund
	checks rental applicants' credit records from Suomen Asiakastieto
	Oy. The Seafarers' Pension Fund also receives information that is
	used to check a rental applicant's ARAVA eligibility. personal data
	is also received from Kela and Intrum Justitia. Rental payment
	information is retrieved from accounting.
7. Disclosures and	Personal data is disclosed to Vuokraturva, MEK-Huoloto Oy and
transfers	Isännöinti Hillo Oy. Additionally, the Seafarers' Pension Fund
	discloses information to Intrum Oy and to Kela.
	The Seafarers' Pension Fund does not disclose or
	transfer personal data to parties outside of the EU or
	EEA.
8. Storage period	The Seafarers' Pension Fund will store personal data, in
	accordance with the valid legislation, for the purpose of managing
	the tenancy. The Seafarers' Pension Fund has a statutory
	obligation to store personal data related to the rental agreement
	in accordance with accounting legislation.

9. Rights of registered persons

In accordance with data protection legislation, registered persons have the right of access to information and to receive confirmation of any processing of personal data.

Registered persons also have the right to rectify inaccurate or false personal data. A request to rectify information must be addressed in writing to the Seafarers' Pension Fund using the address specified in section 1.

Registered persons have the right to request that the Seafarers' Pension Fund remove any personal data concerning them. Personal data cannot be removed if the Seafarers' Pension Fund has a statutory obligation to store such information. All personal data is removed, however, once their lawful storage period has ended.

The registered persons have the right to prohibit or restrict the processing of their personal data.

When making procedural requests, registered persons must consider their contractual obligation to the service provider.

Requests related to the rights of the registered persons should be addressed in writing to the Seafarers' Pension Fund using the address specified in section 1.

If the Seafarers' Pension Fund is unable to realise the request of a registered person, the Fund will notify the registered person, within one month, of the legal basis for the refusal. If registered persons feel that their rights, as provided by data protection legislation, have been violated, they can submit a complaint to the relevant supervisory authority.