

Privacy Policy: Notification channel

This policy is based on the EU General Data Protection Regulation, the EU Whistleblower Directive and national whistleblower legislation.

1. Controller

Koy Ideapark Ab, later Ideapark
Ideaparkinkatu 4, 37570 Lempäälä, Finland
Tel. +358 29090 2014

2. Contact person in matters concerning the data file

Eija Hussi, tel. +358 44 066 8170, eija.hussi@ideapark.fi

3. Data Protection Officer

Tero Mäkelä, tel. +358 44 019 0478, tero.makela@ideapark.fi

4. What is the purpose of processing personal data

You can report any observed irregularities and misconduct through the notification channel. The notification can include personal data. Personal data is processed only to fulfill Ideapark's legal obligations, to exercise the right to supervision and control, and in the process of processing received notifications.

The processing of personal data is based on the controller's legal obligation or the controller's or a third party's legitimate interest in relation to third party data, such as data on person's subject to the notification, and on the controller's consent or the controller's or a third party's legitimate interest in relation to the notifier's data. Regarding the personal data of the person processing the notifications, the processing is based on a legal obligation or legitimate interest.

Notifications received by Ideapark are processed by notification handlers appointed by Ideapark. Personal data included in the notification may be used to investigate the reported matter.

5. How is personal data collected?

When making a notification, the notifier provides information about the irregularity or misconduct they have observed. The notification does not disclose personal data from the notifier by default unless the notifier gives said information. The reporting guidelines for the notification channel state that making a notification does not require, for example, providing notifier's personal information. If the notifier gives personal information about themselves, they are processed as data subjects.

The notification can include personal information from other people if the notifier sees that information being absolutely necessary for the notification. In addition, personal data can be collected during the processing of the notification.

The controller collects personal data from notification handlers for notification processing and access management.

Personal data may include, among other things, name, address, phone number, email and position and if necessary, role of the data handler.

The notification channel does not collect data that could be used to identify the person, such as IP-addresses or cookies

6. How is personal data processed?

Personal information is processed via the notification channel to process the notifications received. Based on the notifications, the controller will take appropriate actions.

Personal data gathered with notifications is saved in a protected database on the notification channel system. The data is only available to notification handlers pointed out by the controller. The controller can limit access to notifications based on different notification types or the role of the handlers. If necessary, the controller can transfer the data to the controller's own database for processing or archiving. The data is stored in a secure format.

7. To whom is the personal data disclosed with?

Personal data is processed by the controller's designated notification handlers. The handlers do not disclose personal data to third parties in situations other than those based on law, such as if the processing of the notifications leads to an official investigation or if the disclosure is necessary to implement the measures required by the results of the notification investigation.

Personal data may also be shared with third parties in situations where the impartiality of the handling of notifications cannot be guaranteed due to the vested interests of the notification handlers appointed by the controller. In such cases, to ensure impartial processing of the notification, the controller may authorize an external handler(s) to process the notification in accordance with this statement and the requirements of the law. Such an external handler may be, for example, an auditor, lawyer or other independent expert.

8. Is personal data transferred outside of EU?

We do not transfer personal data outside of EU.

9. How is personal data protected?

Notifications are stored in a secure format.

Only the notification handlers appointed by the controller are informed about the notifications and are allowed to process the notifications in the service. Each handler uses their own unique user ID when logging in to process the notifications. The person responsible for the technical maintenance of the system does not have the right to access the notification database.

Notifications and related information are archived in a secure format. Only designated notification handlers have access to the archived information.

10. How long is personal data processed?

Personal data will be deleted and destroyed five (5) years after receipt of the notification, unless their retention is necessary for the exercise of rights or obligations provided for by law or for the establishment, exercise or defense of legal claims.

The necessity of further storage of the data will be reviewed no later than three (3) years after the previous review. The review will be noted in the database.

Personal data that is clearly irrelevant to the processing of the notification will be deleted without undue delay. The notification will be retained on the notification channel for one (1) year in the form in which the notifier sent it. The retention period in the notification channel may be extended for legal reasons. The notification, including the personal data, will be destroyed from the notification channel after the retention period has expired. When archiving, the handlers will delete personal data that is clearly irrelevant to the report.

The controller deletes and destroys personal data after the processing of the personal data is no longer necessary.

11. Data subject rights

The data subject has rights in relation to the processing of personal data. Rights may be restricted by law. Any restrictions on the rights of data subjects must be based on proportionate and necessary grounds, such as ensuring the accuracy of the notification or protecting the identity of the notifier and must not restrict the rights of data subjects more than is necessary.

In principle, the data subject has the right to access his or her own data, except where the restriction of access is based on the need to protect the essential rights of the controller or a third party. This is the case, for example, if access to the data would lead to the identity of the notifying person being at risk of being revealed.

The data subject has the right to request the rectification or erasure of data collected about him or her. This right of the data subject may also be restricted if the purpose of the restriction is to safeguard the controller's statutory obligation, in particular the obligation to provide a reliable and impartial notifying channel.

The data subject has the right to request the erasure of personal data collected about him or her, provided that one of the following criteria is met and that there is no obligation to retain the data due to other legislation or official regulations:

1. personal data is no longer needed for the purposes for which it was processed;
2. the data subject objects to the processing on grounds relating to his or her particular personal situation and there are no legitimate grounds for the processing;
3. the personal data have been processed unlawfully; or
4. the personal data must be erased in order to comply with a legal obligation to which the controller is subject under European Union law or Finnish law.

The data subject has the right to object to the processing of personal data concerning him or her. If the controller processes the data based on a legitimate interest, the data subject has the right, on grounds relating to his or her particular situation, to object to the processing of personal data concerning him or her.

If the data subject's right has been restricted by law to the extent that it is necessary and proportionate to ensure the verification of the accuracy of the notification or to protect the identity of the notifier, the data subject has the right to be informed of the reasons for the restriction and to request that the information be provided to the Data Protection Ombudsman.

If only part of the data concerning the data subject is such that the data subject's rights may be restricted, the data subject has the right to know the other data concerning him or her.

In principle, the controller will process the data subject's request within one month. We ask you to contact the address mentioned in section 1 of this privacy policy regarding your rights.

The data subject has the right to file a complaint with the Data Protection Ombudsman.

12. Is there profiling?

There is no profiling with personal data.

13. Which country's laws applies to the processing of data?

Finnish legislation applies to the processing of data.