

# Processing insured persons' and pension customers' personal data at Keva

Why do we collect and process personal data?

Keva's statutory task is to implement pension security in the public sector. We collect and process personal data when carrying out the following tasks, amongst others:

- Processing pension and rehabilitation matters and pension calculations
- Providing guidance and customer service via various channels and giving pension estimates
- Pension payments
- Compiling pension statistics and research activities
- Handling pension security financing and calculating pension contributions
- Supporting workplace wellbeing and work capacity management

We only collect personal data in cases where the information is required in order to fulfil our statutory task.

With the help of artificial intelligence tools (Microsoft M365 Copilot), personal data is processed only in assisting tasks. Al tools, such as language models, do not make decisions regarding pension insurance or respond directly to customers.

Calls made to our customer service are primarily recorded to verify the customer service transaction.

Keva may also use personal contact details in relation to questionnaires and research regarding service improvement. Consent is always sought prior to responding to a questionnaire.

## What personal data do we process?

We process the following data:

- Information needed to identify the person and other basic information (e.g. name, personal identity code, language)
- Contact details (postal address, telephone number, email address, country of residence)
- Information regarding guardianship
- Employment and income information needed to handle matters related to benefits
- Information regarding interactions (e.g. communication channels, times and subjects) Customer phone calls
- Information regarding personal guidance
- Information regarding the processing of pension and rehabilitation matters and decisions (e.g. the beginning and end of your pension, your pension decision and pension calculation, documents regarding appeals and claims for recovery)



- Medical reports and other documents relating to health conditions for work capacity assessments regarding disability pensions and rehabilitation benefits
- Information regarding benefit payments (e.g. account number, taxation information)
- Information regarding other benefits and payments that may affect the pension

# How long do we store personal data for?

The periods for how long Keva stores different documents are defined in Keva's information management plan.

- Documents relating to pension and rehabilitation matters will be stored for the whole life-span and for the 10 following calendar years.
- Documents relating to family pensions will be stored for the duration of the pension payment and for the 10 following calendar years.
- Appeal documents will be stored for 50 years, unless the data must be stored as pension documents for a longer period.
- Recordings of customer phone calls will be stored for up to 2 years.
- All chatbot conversations are stored for three months for technical purposes.
- The chatbot conversations of customers that have logged in to the My Pension service are stored according to Keva's information management plans as documents relating to pension and rehabilitation matters.

## Where do we get the data?

- From employers (employment and annual income)
- From the individuals themselves (information they provide on applications for benefits and other information)
- From the Finnish Centre for Pensions (private employment and income information)
- From other pension and insurance institutions (information on pensions or benefits that may affect the pension)
- From consulting doctors and public health services if the applicant for benefits has not provided the required patient document information.

#### Who do we disclose data to?

Keva's pension register data is confidential. The data can only be disclosed to other parties if the requester has the consent of the person in question or if there are specific legal grounds for disclosure or right to gain information. We disclose data on legal grounds to the following parties, amongst others:

- Finnish Centre for Pensions
- Other pension institutions and insurance institutions



- Social Insurance Institution of Finland
- Finnish Tax Administration
- Statistics Finland
- Unemployment funds and employment authorities
- Employers
- Social welfare authorities
- Enforcement authorities
- Rehabilitation service providers

#### Do we transfer data outside the EU/EEA area?

We do not transfer data to outside of the EU/EEA. Keva's service provider is Microsoft Oy, which processes data in the EEA region. In limited circumstances such as testing and development, the processing of personal data in the United States or outside the EEA area is based on the European Commission's data protection adequacy decision and standard clauses approved by the Commission.

# How do we protect your personal data?

Keva ensures a high level of data protection in its systems. System data protection and personal data protection and soundness are ensured with the help of technical and organisational measures. These measures include, amongst others, data encryption, data protection updates, data protection testing and backups.

Every Keva employee signs a confidentiality agreement for processing personal data as part of his or her job duties. Employees of organisations that process personal data collected by Keva, and who have access to this personal data, are required to sign a confidentiality agreement.

Your personal data is only processed by authorised persons and credentials for accessing our information systems are only assigned to said persons on the basis of their job duties. Our information systems require a personal username and password to log in. The sessions are logged in our system, which allows the use of the system to be monitored.

#### How can you check your own personal data?

You have the right to check what information we hold about you in our systems. You can also request to receive copies of any data or documents containing your personal data.

You can file a request to check your personal data via secure email by clicking on this link.

How can you request to rectify, delete, restrict or object to the processing of your personal data?



You have the right to request that any incorrect data held about you in our register be rectified. You can file a rectification request via secure email by clicking on this link.

Information required to perform statutory tasks cannot be deleted from the register. Such data will be deleted automatically after the set timeline for storing the data has expired. You cannot request that processing be restricted or data be transferred to another system if legal grounds exist for processing the personal data in question.

If we should refuse to comply with your request, you have the right to take the matter to the Office of the Data Protection Ombudsman.

Contact details for the Office of the Data Protection Ombudsman: Office of the Data Protection Ombudsman Postal address: P.O. Box 800, 00521 Helsinki

Telephone number: +358 29 56 66700

Email: <u>tietosuoja@om.fi</u>

Contact details for the Controller and Data Protection Officer

Keva Unioninkatu 43 00087 Keva Telephone 020 614 2837 / 020 614 21

Data Protection Officer Keva Unioninkatu 85 Telephone 020 614 2332 Email: <u>tietosuoja@keva.fi</u>

Please use secure email via this link.