

## Luotea -sairauskassa (sickness fund) privacy policy

Updated 31.12.2025

<b>Controller:</b>	Luotea-sairauskassa Business ID: 2153218-8
<b>Contact details:</b>	Name: Luotea Oyj Address: Kutomotie 2, 00380 Helsinki Puhelin: 010 590 2000 Email: tietosuoja@luotea.com
<b>Name of the register:</b>	Luotea -sairauskass member register
<b>Legal basis for processing personal data:</b>	<p>The processing of personal data is based on the legitimate interest of Luotea-sairauskassa (the so-called connection requirement), which arises when an employee establishes an employment relationship with a shareholder company covered by the scope of Luotea-sairauskassa, in accordance with the rules of Luotea-sairauskassa. Additionally, the processing of personal data is based on fulfilling a statutory obligation (such as the Health Insurance Act and the Insurance Fund Act).</p> <p>Luotea-sairauskassa is a workplace fund established jointly by Luotea and its employees. The Luotea Sickness Fund supports Luotea's work ability management and complements occupational health care.</p>
<b>Purpose of processing personal data:</b>	<p>The personal data contained in the register is used for the following purposes:</p> <ul style="list-style-type: none"><li>• Management of membership matters, such as preparing, processing, and deciding on reimbursement applications, as well as payment of benefits</li><li>• Member communication</li></ul>
<b>Categories of data subjects:</b>	Members of Luotea-sairauskassa
<b>Contents of the register:</b>	<p>The register contains the following information required for membership:</p> <ul style="list-style-type: none"><li>• First and last name</li><li>• Contact details (postal address, email address, and phone number)</li><li>• Identification information (personal identity number)</li><li>• Bank account number</li><li>• Employment-related information (such as the start date of employment, probation period end date, and end date of fixed-term employment)</li><li>• Information on whether the registered individual belongs exclusively to the Luotea-sairauskassa</li></ul> <p>During membership, the register also contains the following data collected:</p> <ul style="list-style-type: none"><li>• Reimbursement applications and their attachments</li><li>• Details related to the application, preparation, decision, payment, and processing of reimbursements</li></ul>

**Regular sources of information for the register:**

The information is primarily obtained directly from the registered individual. In addition, the Sickness Fund receives information necessary for its operations from Luotea's HR system (such as names, addresses, and employment start dates, which are needed to verify membership eligibility) directly from the employers of the registered individuals, which are companies within the Luotea Group. Information regarding the termination of employment is also received directly from the registered individual's employer. Reimbursement applications are obtained from healthcare service providers in cases where the treatment subject to the reimbursement application is not covered by occupational health services. The register does not have any other external regular sources of information.

**Regular Disclosure and Transfer of Data:**

Personal data is regularly disclosed to the Social Insurance Institution of Finland (Kela) (for example, when the registered individual becomes a member of the fund or when their membership ends). In addition, information about the commencement of membership is notified to the registered individual's employer. Requests made by registered individuals are processed by the employer and/or Luotea Sickness Fund and/or Luotea Plc, all of whom are provided with the necessary data to handle the registered individual's request. Personal data may occasionally be disclosed as required by law.

Luotea Sickness Fund uses service providers for the following services in relation to personal data processing:

- System maintenance, development and troubleshooting

Each service provider processes personal data in accordance with a data protection agreement and only to the extent necessary for the provision of the respective service.

**Transfer of Personal Data Outside the EU or EEA**

Personal data is considered to be transferred outside the EU and EEA when, in connection with the provision of IT services, there is access to personal data from outside the EU or EEA. Agreements have been made with service providers regarding these transfers, in accordance with the standard contractual clauses approved by the European Commission.

**Protection of data:**

The register's data is stored in information systems that utilize both technical and software-based measures to ensure data security and monitor data usage. Each person with access to the register has a personal username and password for the system. Access to the register's data is limited only to designated individuals and only to the extent required for their job duties. All individuals who use the register's data are bound by a duty of confidentiality.

**Retention period of data:**

The information in the register is retained for as long as necessary to fulfill the purpose of the register. Basic information concerning a member is stored after the termination of fund membership in accordance with the Prepayment Act and the Accounting Act, for the current year and the following ten (10) years. Data collected during the period of membership is retained according to a separate archiving plan concerning the retention periods for personal data and documents, which has been prepared based on the guidelines issued by the Social Insurance Institution of Finland.

**Rights of the data subject:****Right of Access and the Right to Request Rectification or Deletion of Data**

The data subject has the right to inspect what information concerning them has been entered into the register. Additionally, the data subject has the right to request the rectification of incorrect information as well as the deletion of data. Requests for inspection, rectification, and/or deletion must be submitted in writing using the contact details mentioned above.

**Other Rights**

In accordance with the General Data Protection Regulation, the data subject has the right to object to or request restriction of the processing and transfer of their data, as well as the right to lodge a complaint with the data protection authority regarding the processing of personal data.