



# **DATA PROTECTION AND INFORMATION SECURITY PASSPORT 2026**

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**Provisions on the processing of personal data are laid down in many acts and decrees, such as the EU's General Data Protection Regulation (GDPR), the Personal Data Act, and the Act on the Protection of Privacy in Working Life. Careful processing of personal data applies to all of us, every day. That's why we familiarise all new employees with this important theme and review the basics together every year.**

Data protection simply means that personal data are processed carefully and in accordance with the law. This material will introduce you to S Group's data protection policies.

Review the material and, if necessary, confirm with your S Group supervisor that you:

- understand what the importance of data protection is in your work and when you are processing personal data
- you are able to explain what is meant by personal data and the processing of personal data
- you are able to describe what a data subject and the rights of the data subject are
- you know how information security is linked to data protection.

## 1. WHAT IS CONSIDERED PERSONAL DATA?

Personal data means data that can be linked, directly or indirectly, to an identified or identifiable person.

Examples of personal data include a person's name and contact information, personal identity code, location data, computer IP address, ID/username, car registration number, fingerprint, voice and photos of the person.



Name and contact information



Personal identity code



Location data



Computer IP address



ID/username



Car registration number



Fingerprint



Voice



Photo



## 2. WHAT IS CONSIDERED PROCESSING PERSONAL DATA?

The processing of personal data means all measures targeted at personal data during their lifecycle, ranging from the collection of data to its erasure.

For example, the lifecycle of personal data might begin when a person joins as a co-op member or submits a job application to the recruitment system and provides their information to an S Group operator. Correspondingly, the lifecycle ends when the personal data are erased from the register in question.

Every time personal data are processed, there must be an appropriate purpose and grounds for the processing.

**Learn how personal data are processed at different stages of the lifecycle using the example on the next page.**

## **1. ORGANISING A COMPETITION**

Your unit decides to organise a competition where the prize is a gift certificate to an S Group store.

## **2. COLLECTION OF DATA**

For the competition, contact data on the participants (full name, email address, and telephone number) are collected using a separate form, and the winner is drawn from among the forms submitted.

The form must inform the participants of the use of their personal data and data retention periods. The form must also have a link to the privacy policy.

The form also requests specific permission to publish the winner's name on social media.

## **3. USE OF DATA**

Data are collected throughout the validity of the competition and are used for performing the prize draw.

The organiser of the competition must use the winner's personal data for performing the prize draw and announcing the results.

The information provided in the competition form may not be used for any other purpose, unless there is a basis for other use and the use has been disclosed in connection with the competition and data collection.

## **4. STORAGE OF DATA**

The participants' personal data are stored electronically until the winner has been drawn. The retention period must be defined before any collection of data.

## **5. DELETING DATA**

Data on participants in the prize draw is erased without delay when the competition ends. During the collection and processing of data, information security and adequate confidentiality must also be ensured.

# 3. CAREFUL PROCESSING OF PERSONAL DATA

Careful processing of personal data goes a long way by keeping a few basic things in mind.

- Personal data must always be processed in line with the principle of minimisation and securely.
- No unnecessary personal data can be processed, including collection and retention.
- In addition, it is not always necessary to identify the data subject.
- Personal data may only be processed by those whose duties require it.
- If personal data has been collected on paper, dispose of unnecessary papers securely by placing them in an information security bin.
- Do not discuss customer information or matters in front of other customers or during your free time.

## Example:

**A customer comes to visit a service point to say that they have not received any Bonus for their purchases. The matter is forwarded from the service point by email for further investigation. You know the email is forwarded through several people before reaching the person responsible for the matter. What should you do?**

**Always consider whether you could do your job without processing personal data or by only processing data that does not directly identify the person. Whenever you forward a message you have received, think of whether it includes personal data that should be erased. Personal data must always be processed securely, and any unnecessary personal data cannot be processed. In this case, a membership number can be sent by email within S Group, but the whole payment card number cannot, even when encrypted.**

## 4. WHO IS A DATA SUBJECT AND WHAT RIGHTS DO THEY HAVE?

When talking about data protection, you will certainly encounter the concepts of “data subject” and “the rights of the data subject”. Next, we will take a look at what these terms mean.

**A data subject** is a person whose personal data we process and whose data are stored, for example, in our customer register.

**The rights of the data subject** mean that the data subject has, among other things, the right to receive information about the processing of their personal data, the right to access their data and to request the deletion of their data. Other rights of a data subject include the right to have any incorrect data rectified and the right to prohibit direct marketing.

### Example:

The customer comes to the customer service point upset and demands to know what data we process about them. The customer is familiar with their rights as a data subject guaranteed by the data protection legislation and threatens to take the matter further if the request is not immediately accepted. What do you do?

Reassure the customer and refer them to S Group's data protection website. On the website, we explain the processing of personal data in S Group and provide instructions on how the customer can make a request for information about their own data.

S Group's data protection website can be found at [tietosuoja.s-ryhma.fi](https://tietosuoja.s-ryhma.fi)



## 5. INFORMATION SECURITY AT S GROUP'S BUSINESS LOCATIONS

Information security is extremely important for S Group to protect confidential information.

Information security is used to protect information and to implement data protection. Information security includes matters such as

- you use strong passwords and keep them to yourself
- you use work tools and systems for work purposes according to the guidelines
- you discuss S Group matters only when outsiders are not listening.

### **KEEP IN MIND AT LEAST THESE THREE IMPORTANT THINGS ABOUT INFORMATION SECURITY:**

- Act thoughtfully. If something feels strange, stop and ask a colleague or supervisor for advice.
- Also remember physical security. Take good care of devices, and always lock all devices when you leave them unattended, even for just a moment. Also ensure that no unauthorised persons can access S Group's facilities.
- If you see or feel that information security or personal data are at risk, contact your supervisor.

## 6. RECAP

You should now have an understanding of the basics of data protection! Finally, let's review the most important points.

### CHECKLIST FOR THE PROCESSING OF PERSONAL DATA:

- Personal data can only be processed when it is necessary at work and only to the necessary extent.
- Be careful when processing personal data. For example, always keep any sensitive documents in a locked cupboard away from prying eyes.
- Do not disclose or share colleagues' or customers' data without permission.
- Remember that colleagues' and customers' personal matters cannot be discussed with others.
- Also remember that you are bound by a duty of non-disclosure during and after your employment relationship. You may not disclose matters you have learned by accident to any outsiders.
- If a customer asks how S Group processes their personal data, instruct them to visit S Group's data protection page at [tietosuoja.s-ryhma.fi](https://tietosuoja.s-ryhma.fi). If the customer wants to know how they can access their personal information, instruct them to log in to their S user account and access the information in the customer-owner and customer register, go to the website [tietosuoja.s-ryhma.fi](https://tietosuoja.s-ryhma.fi) or visit a customer service point. For S-Bank, the customer can be directed to the website [s-pankki.fi/fi/tietosuoja](https://s-pankki.fi/fi/tietosuoja).
- Also protect your own personal data!
- In data protection matters, you can turn to your S Group supervisor or contact the Data Protection Officer in your S Group organisation or S Group's Data Protection Officer ([tietosuojavastaava@sok.fi](mailto:tietosuojavastaava@sok.fi)). As for S-Bank, you can contact your own unit's data protection contact person or S-Bank's data protection officer.
- Your primary contact person in data security matters is your own S Group supervisor.



## CHECKLIST FOR INFORMATION SECURITY:

- Do not click on anything in an email or on the Web that you are unsure of.
- Comprehend and learn the practices related to password management.
- Only keep your credentials and passwords to yourself; no other member of S Group will ever request them.
- Be sceptical about unusual requests, questions or calls, especially if they are not in Finnish.
- Only use the secure tools provided by your workplace to process and transmit personal data.
- Also remember physical security. Take good care of devices, and always lock all devices when you leave them unattended, even for just a moment. Also ensure that no unauthorised persons can access S Group's facilities.
- Lock your computer whenever you leave it unattended.
- If you see or feel that information security or personal data are at risk, contact your S Group supervisor.

**If you suspect or discover any inappropriate processing of personal data – for example, another person's personal data or a document containing another person's personal data are accidentally shown to a customer, or a message has been sent to the wrong person by accident:**

- 1. Start by investigating the event and by preventing any further harm.**
- 2. Report the matter to your supervisor or your own organization's data protection contact person and do it yourself or ask your supervisor to report the matter to SFalcony.**

**You can find more information about recording deviations and using SFalcony in SPoint's privacy section.**

**In addition to the SFalcony notification, call the emergency number: 010 768 2440 if the following information is related to the case or if you think the severity of the effects of the deviation is otherwise significant:**

- health-related data,
- personal identity codes
- linked usernames and passwords,
- several data controllers,
- a large group of personal data, or
- misplaced data on children or other data subjects in a weaker position.

## **CONTENT OF THIS TRAINING MATERIAL:**

**What is considered personal data?**

**What is considered processing personal data?**

**Careful processing of personal data**

**What is a data subject and what rights do they have?**

**Information security at S Group's business locations**

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