Privacy Statement
Processing of Personal Data on Construction Sites

Last updated: 22 September 2026

1. Data controller and contact details

Name: Are Oy (company registration number: 0989493-6)
Kaivokselantie 9
01610 Vantaa
Email:gdpr@are.fi
Tel. 020 530 5500 (switchboard, 8 am–4 pm)

2. What data do we process, and what are the purposes and legal bases for processing it?

When Are acts as the main contractor for the construction site, we process the following personal data of employees, self-employed workers and contractors' contact persons working on the joint construction site in connection with site management:

TYPES OF PERSONAL DATA	PURPOSE OF PROCESSING	LEGAL BASIS
Basic and contact details, such as a person's first name and surname, postal address, email address, telephone number, date of birth or personal identification number, tax number	Carrying out the contract, monitoring and measuring work performance, ensuring safety on the construction site, and fulfilling reporting obligations	Compliance with statutory obligations (e.g. the Tax Procedure Act, the Decree on Safety in Construction Work, the Occupational Safety and Health Act)
Information required under the Occupational Safety and Health Act, such as the start and end dates of work on site, the employee's employer's name, contact details and business ID or equivalent foreign identifier, site-specific induction details, and information regarding the role and the work site	Execution of the contract, supervision and measurement of work performance, ensuring safety on the construction site	Compliance with statutory obligations (Occupational Safety and Health Act, Decree on Safety in Construction Work)
Site-specific access permit details, such as access event details, access control key number and access rights group	Ensuring the safety of the construction site area, premises and persons moving within the area; monitoring work performance	Legitimate interest

With regard to ***foreign labour and work carried out abroad***, information necessary to verify the right to work (such as a residence permit) and to fulfil the notification obligation , such as the name and contact details of a representative in Finland, residence permit number, nationality, and a copy of a passport or identity card	Carrying out the contract, monitoring and measuring work performance, and ensuring safety on the construction site	Fulfilment of statutory obligations (e.g. the Act on the Posting of Workers, the Aliens Act)
Information relating to the client's liability, such as details of the applicable collective agreement, certificates confirming that employees' pension insurance has been taken out and that pension insurance contributions have been paid, and certificates confirming the determination of employees' social security entitlements	Carrying out the contract and fulfilling reporting obligations relating to contracting and the use of external labour	Fulfilment of statutory obligations (the Act on the Contractor's Liability)
Other information required for tax purposes, such as the identification details of the party subject to the reporting obligation, the contact person and their contact details, the location of the worksite, information regarding the insurance of foreign employees, information regarding the nature of the employment relationship, identification details of the employer and the user of temporary agency workers, as well as information concerning the contractor and their employees to be processed on the basis of the contract.	Compliance with tax-related reporting obligations	Compliance with statutory obligations (the Tax Procedure Act, the Tax Administration's decision on the obligation to provide information relating to construction)

3. Where do we obtain the information?

Data is routinely collected from the data subject or the contractor themselves. Personal data may also be collected and updated from public and private registers within the limits permitted by law.

Data on access events is collected automatically via time and attendance machines when a person uses an access card. In exceptional cases, manual registration is used to record access events.

4. To whom do we disclose data, and do we transfer it outside the EU or the EEA?

Data is routinely disclosed, in accordance with legal requirements, to public authorities and other bodies, such as the tax authorities, the occupational safety and health authority, the Employment and Economic Development Office, as well as to employees' representatives and occupational safety and health representatives. We may also disclose data to our partners in order to fulfil obligations arising from contracts or under the law.

As a general rule, we process data ourselves, but we also use subcontractors in our operations who process personal data on our behalf, for example when providing IT management services. When we transfer personal data to a data processor, we have ensured, through contractual arrangements amongst other measures, that the data processor processes personal data only in accordance with our written instructions.

Personal data is stored within the EU/EEA. However, the IT management systems we use may allow the service provider to access data from outside the EU/EEA, such as from the United States. Where personal data is processed outside the EU or the EEA, we ensure that the subcontractor has committed to the appropriate safeguards required by the General Data Protection Regulation (GDPR), such as the European Commission's standard contractual clauses for the transfer of personal data.

5. How do we protect your data and for how long do we retain it?

Manual records and data are protected in accordance with data security requirements as stipulated by law. Access is restricted to those individuals designated by Are who require the data to carry out their duties. They are provided with usernames and passwords. The data is stored on a closed network that is technically protected by a firewall.

We retain personal data for as long as is necessary for the purpose for which it was collected or to fulfil our statutory obligations. For example, data required under the Tax Procedure Act and the Occupational Safety and Health Act is retained for six years from the end of the year in which the construction site was completed. Data collected in accordance with the Act on the Contractor's Liability must be retained by the client for at least two years after the completion of the work covered by the relevant contract.

6. Your rights as a data subject

You have the right to access your personal data and to request the rectification or erasure of any data that is inaccurate, out of date or unlawful. You have the right to object to or request the restriction of the processing of your data, and to lodge a complaint regarding the processing of personal data with the supervisory authority (the Office of the Data Protection Ombudsman). The contact details for the Office of the Data Protection Ombudsman can be found at www.tietosuoja.fi.

For specific personal reasons, you also have the right to object to processing activities concerning you where the basis for processing is a legitimate interest. When making your request, you must specify the particular circumstances on which you base your objection to the processing. We may refuse to comply with a request to object only on grounds provided for by law.

7. Enquiries and amendments to the privacy notice

Please submit all enquiries and requests regarding this privacy notice in writing or in person to the contact point specified in section one (1).

Are may make changes to and update this privacy policy as necessary. Where required by applicable legislation, such changes will be discussed with staff. However, we recommend that you review this privacy policy from time to time.