

Privacy Statement

Register and privacy statement pursuant to §10 and §24 of the Personal Data Act (523/1999) and the EU General Data Protection Regulation (GDPR).

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1. Controller

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2. Contact person for register affairs

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3. Name of register

Customer register

4. Legal grounds and the purpose of the processing of personal data

The legal grounds for the processing of personal data as required by the EU General Data Protection Regulation is the Controller's legitimate interest. The legitimate interest is generated on the basis of the customer relationship between the Controller and the Data Subject. Customers include all persons who have purchased the company's services or products as consumers or on behalf of companies or other associations as their contact persons.

The Controller legally collects and processes only such data as are necessary for the following purposes:

- a) the establishment, implementation, and maintenance of a customer relationship or another contractual relationship
- b) contacting the customer
- c) the production, development, and marketing of the services provided by the Controller
- d) payment transactions, invoicing and collection activities, and credit controls
- e) solving crimes and misuses
- f) statistics, direct marketing, and survey and market research

The data will not be used for automated decision-making or profiling.

5. The data contents of the customer register

The contents of the data stored in the register may vary, depending on for example the services used by the Data Subject. Data stored in the register include:

a) customer data: name, date of birth, address, telephone number, fax number, email address and other electronic contact information, title or occupation, native language, gender, citizenship, and any possible prohibitions issued by the Data Subject concerning the disclosure of data for customer service and direct marketing purposes

b) data for facilitating paid services, the making of contracts, and the establishment of a customer relationship: personal identity code or date of birth, customer identifier, or contract number or similar identifying datum, domicile, country of residence and state for taxation purposes, business ID, the name, postal address, and fax number of the association that the Data Subject represents and the Subject's position in the organisation, web address, start date of the customer or contractual relationship, and other profiling data disclosed by the Data Subject

c) customer feedback data (it is possible to provide anonymous feedback as well)

d) data related to the use of the service: e.g., usage, purchasing, and cancellation data for services

e) booking data related to for example previous and future bookings and data related to the wishes and choices made by the Data Subject (e.g., additional beds, room accessibility, and data about services wanted)

f) payment method and behaviour data (including payment reference data) as well as invoicing data

The register data will only be stored for as long as is justified on legal and business grounds. When the data no longer have any value in terms of their original purpose, all data will be destroyed or anonymised.

6. Regular data sources

The data stored in the register are received from the Data Subjects themselves, e.g. in messages sent via web forms, email, telephone, and social media services, from contracts, customer meetings, and other situations in which the customer consents to disclosing their data. Data sources may also include personal data registered during events relating to the services and purchases that customers want. Personal data may additionally be updated, stored, and collected from the registers of the Digital and Population Data Services Agency, the Business Information System, and other controllers offering address and updating services and other similar services.

7. Regular data disclosures

The personal data stored in the customer register are disclosed to the authorities for the purposes and in the scope defined in the act on tourism and restaurant operations (308/2006). In addition, traveller data may also be stored on servers administered by a service provider used by the Controller, to the extent that is required by the processing of the data.

8. Transfer of data to outside of the EU or EEA

No data is transferred outside the EU or EEA.

9. Principles of customer register protection

The protection of the personal data is maintained at a high level by technological and organisational means

by tracking and mapping the level of threats affecting them as well as by the development of technologies and software suitable for protection. Protection is subject to the principle of continuous improvement, whereby the methods used are updated regularly.

a) Manual materials

Manual materials containing personal data are kept in locked rooms which cannot be accessed by external persons or employees who do not process personal data as part of their job description.

b) Data processed by automatic data processing

Data in electronic format are secured by technological means and stored in a secure manner. They may not be accessed by external persons or employees whose job descriptions do not include the processing of personal data.

10. Right of review and rectification

The Data Subject may review their data stored in the customer register and demand that possible erroneous data be rectified or that missing information be included. The request to exercise the right of review must be made electronically, in person, or in writing and confirmed with one's own signature. The requests must be submitted to the contact details in section 2 of this privacy statement. The person making the request must be able to verify their identity if needed. The Controller shall respond to the request within the time specified in the EU General Data Protection Regulation (usually within one month). The right of review shall always be personal.

11. Right of prohibition

The Data Subject may prohibit the Controller from processing their personal data for the purposes of direct marketing and survey and market research. The request to exercise the right of prohibition must be made electronically, in person, or in writing and confirmed with one's own signature. When it comes to matters relating to the right of prohibition, all requests must be submitted to the contact details in section 2 of this privacy statement. The person making the request must be able to verify their identity if needed.

12. Right to limit the processing

The Data Subject may limit the processing of their data by the Controller in any of the following cases:

a) the Data Subject denies the accuracy of the personal data, in which case the processing shall be limited for a period that is required by the Controller to ensure the accuracy of the data

b) the processing takes place unlawfully and the Data Subject objects to the removal of their data and rather demands that their processing be limited

c) the Controller no longer needs the personal data for the processing purposes, but the Data Subject does need them for the purpose of making, presenting, or defending a legal claim

d) the Data Subject has objected to the processing of the personal data on grounds relating to their personal special situation. Processing shall be limited while waiting for verification of whether the legitimate grounds of the Controller take precedence over the legitimate grounds of the Data Subject.

While the processing is limited, the data may only be processed by permission from the Data Subject or to make, present, or defend a legal claim or to protect the rights of another natural or legal person, excepting the storage of said data. The Controller must notify the Data Subject before lifting the limitation on the processing. All written or electronic requests to limit the processing shall be submitted to the contact details in section 2 of this privacy statement. Requests may also be made in person.

13. Right to transfer the data from one system to another

The Data Subject may transfer their data from one system to another. This right shall only be applied to the automated processing of the personal data when the data pertain to the Data Subject and have been disclosed by the Data Subject, when the processing is based on consent or agreement, and when

the transfer of the data shall not negatively affect the rights and liberties of third parties. If these conditions are met, the Data Subject may receive the data that they have disclosed to the Controller about themselves in a structured, commonly used, and machine-readable format, and they may also transfer said data to another controller. The Data Subject may also have their personal data transferred directly from one controller to another, if technologically feasible.

All written or electronic requests concerning the transfer of data must be submitted to the contact details in section 2 of this privacy statement. Requests may also be made in person. The person making the request must be able to verify their identity if needed. The Controller shall respond to the request within the time specified in the EU General Data Protection Regulation (usually within one month).

14. Right to be forgotten

Data Subjects have the right to request the deletion of their data from the register. All written or electronic requests concerning the “right to be forgotten” must be submitted to the contact details in section 2 of this privacy statement. Requests may also be made in person. The person making the request must be able to verify their identity if needed. The Controller shall respond to the request within the time specified in the EU General Data Protection Regulation (usually within one month).