

## Finnvera's general communications and marketing register

Preparation date 21 January 2019

### 1. Controller

Finnvera plc (Business ID: 1484332-4)

Street address: Porkkalankatu 1, 00180 Helsinki, Finland

Switchboard: +358 (0)29 460 11

### 2. Contact information

tietosuojavastaava@finnvera.fi

### 3. Name of data file

Finnvera's general communications and marketing register

### 4. Purpose of and grounds for the processing of personal data

| Group of data subjects                      | Data will be used  | Grounds for processing        |
|---|--|-------------------------------|
| Contact persons of the client organisations | For the management and maintenance of Finnvera's customer relationships as well as for communicating and marketing Finnvera's services and tasks.  | Legitimate interest, contract |
| Subscribers of newsletters                  | For editing Finnvera's newsletters   | Legitimate interest, contract |
| Event participants                          | For communications related to events organised by Finnvera (e.g. distributing brochures and materials, sharing participant information and collecting feedback) and event arrangements (e.g. informing event speakers of the participants and their backgrounds, sending participants' information to the reception/registration desk, and facility reservations as well as meal and accommodation reservations).<br><br>The information will also be used for marketing the services. Pictures taken at | Legitimate interest, contract |

|  |   |  |
|--|---|--|
|  | events can be used in marketing communications. |  |
|--|---|--|

Personal data is not used for profiling purposes.

Processing tasks may be outsourced to the controller's external service providers in accordance with the data protection legislation and within the framework laid out by legislation.

**Data contained in the data file**

Information about the data subjects that may be stored includes the following:

- the person's name
- organisation
- position/duties in the company
- work contact information
- work e-mail
- work phone
- information related to the practical arrangements of events, such as - meals (dietary preferences, allergies) - accommodation (hotel details) or travel arrangements (flights and other travel information, passport information and other travel documents).

**6. Retention of personal data**

We will erase the personal data from the register no later than when there has been no activity with the client in question during the preceding five years.

The information concerning practical arrangements provided for the purpose of event organisation (such as meals/accommodation, etc.) will be disposed of when the need for processing the event information no longer exists.

The information is disposed of by erasing the information in full.

**7. Regular sources of data**

The information is collected from the persons themselves verbally or in writing upon contacting them.

Information may also be collected from public sources, such as the company's website.

On a case-by-case basis, we may also obtain participant information from events organised by cooperation partners, for example.

The information is updated as needed.

**8. Regular disclosure of data and groups of recipients**

Data may be disclosed to Finnvera's cooperation partners for the purpose of sending email newsletters and invitations to events. Data may also be disclosed on the basis of the Act on the Customer Data System for Enterprise Services (293/2017) to stakeholders referred to in the legislation.

#### **9. Transfer of data outside the EU or the EEA**

Personal data is not transferred outside the EU or the EEA.

#### **10. Data file protection principles**

The controller's personnel are committed to complying with the confidentiality obligations.

Access by personnel to the electronic data content of the register has been limited by means of user IDs and passwords. The environment has been protected by means of appropriate firewalls and other technical protection.

The purpose of the aforementioned measures is to secure the confidentiality of the personal data stored in the register, the availability and integrity of data as well as the realisation of the rights of the data subjects.

#### **11. Automatic decision-making**

The data contained in the register is not used for decision-making that has legal consequences to the person affected and is based on automatic processing of data, such as profiling.

#### **12. Data subject's right to object to the processing of their personal data**

Related to their specific personal situation, the data subject has the right to object to the profiling affecting them and other processing activities that the controller performs on the data subject's personal data insofar as the basis of the processing of data is the controller's legitimate interest.

The data subject may file their claim concerning the objection in accordance with item 15 of this privacy statement. When filing their claim, the data subject should specify the specific situation that is the basis of their objection to the processing of their data. The controller may refuse to implement the request concerning the objection on the grounds provided by law.

#### **13. Data subject's right to object to direct marketing**

The data subject may grant to the controller their consent to or prohibit direct marketing depending on the channel, including profiling carried out for direct marketing purposes.

#### **14. Data subject's other rights related to the processing of personal data**

The data subject has the right to inspect data that has been stored concerning them in the register. The inspection request should be filed in accordance with the instructions provided in this privacy statement. The inspection right may be denied on the grounds provided by law. As a rule, the regular exercise of the inspection right is free of charge.

Insofar as the data subject themselves can do so, they must, without undue delay after learning about an error or after they themselves have detected an error and at their own initiative, correct, erase or supplement any data in the register that is in violation of the purpose of the register, incorrect, unnecessary, incomplete or outdated.

Insofar as the data subject is unable to correct the information, the correction request is filed in accordance with item 15 of this privacy statement.

The data subject also has the right to demand that the controller restrict the processing of their personal data—for example, in a situation where the data subject is waiting for the controller's response to their request concerning the correction or erasure of their data.

The data subject has the right to appeal to a competent supervisory authority if the controller has not complied with the applicable data protection regulations in its operations.

#### **15. Contact information**

The data subject should contact the controller in all matters concerning the processing of personal data and the exercise of their own rights. The data subject may exercise their rights by contacting Finnvera's data protection officer at [tietosuojavastaava@finnvera.fi](mailto:tietosuojavastaava@finnvera.fi).