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# Privacy Policy Customer Register

#### Data controller

Electric Power Finland Oy (Business ID 2104873-2) Prosessitie 6 FI-21530 Paimio

# Contact person for matters concerning the register

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# Legal basis and purpose of the processing of personal data. Is the provision of personal data a legal or contractual requirement?

The purpose of the register is to maintain the organisation's customer register, manage, archive and process customer orders, and manage customer relations. Data can be used for operational development and statistical purposes and to provide more personalised and targeted content on our online services.

Personal data is processed within the limits permitted and required by the Data Protection Regulation (GDPR).

The register data can be used in the organisation's own registers, for example, to target advertising without disclosing personal data to third parties. The organisation may use partners to maintain its customer and service relationships, in which case parts of the register data may be transferred to the partner's servers because of technical requirements.

The data will only be processed to maintain the customer relationship of the data controller's organisation through technical interfaces.

The organisation has the right to publish data contained in the customer register as an electronic or written list unless the customer specifically objects. In this case, a list means, for example, mailing labels used for direct mail advertising or the like. The customer has the right to object to the publication of the data by notifying the register's contact person.

The legal basis for the processing of personal data is an agreement.

#### **Basis of legitimate interest**

#### Categories of personal data concerned

Name, organisation represented, contact information, billing information

# **Recipients and groups of recipients**

Personnel of the data controller and outsourcing partners (financial management) where applicable

#### Consent

#### Data content of the register

The Personal Register contains the following information:

- First name and surname of the person
- The community they represent
- Email address
- Postal address
- Phone number
- www address
- IP number
- Information on previous orders

#### **Regular sources of data**

The data is obtained from customer registrations and notifications made by the customer during the customer relationship. Name and contact information updates are also obtained from the authorities and companies providing update services.

Data may also be obtained from subcontractors related to the use or production of a specific service.

Data about customers' other activities in the digital environment may be obtained from partners' websites, information systems or other digital sources to which one can log in through an electronic invitation (link), cookies or by using the credentials provided to customers.

The data in the customer register is only available to the organisation, except when using an external service provider, to provide additional services or to support a credit decision.

The data will not be disclosed outside the organisation or to its partners except in matters relating to credit applications, collection or invoicing, as well when required by law. Personal data will not be transferred outside the European Union unless this is necessary for the registrar or its cooperating partner to ensure the technical implementation. The personal data of the data subject will be deleted at the request of the user unless legislation, open invoices or collection measures prevent the data from being deleted.

#### **Retention period of personal data**

10 years from the end of the customer relationship.

# **Regular disclosures of data**

The data in the customer register is only available to the organisation, except when using an external service provider, to provide additional services or to support a credit decision.

The data will not be disclosed outside the data controller's organisation or to its cooperation partners except in matters relating to credit applications, collection or invoicing, or when required by law.

The personal data of the data subject will be deleted at the request of the user unless legislation, open invoices or collection measures prevent the data from being deleted.

# Transfer of data outside the EU or EEA

Personal data will not be transferred outside the European Union unless it is necessary to ensure the technical implementation of services offered by the organisation or one of its partners.

# Principles for the protection of the register A: Manual data material

Contact information collected in customer transactions and other manually processed documents containing customer data are stored in locked and fire-proof storage facilities after initial processing.

Only designated employees signed a non-disclosure agreement are authorised to process manually stored customer data.

The data in the register is protected and processed in accordance with the provisions and principles of the Data Protection Act, the regulations of the public authorities and good data processing practices.

#### Principles of registry protection B: Electronic data material

Only designated employees of the organisation and companies acting on its behalf are entitled to use the customer-owner and customer register and maintain its data. Each defined user has their own personal username and password.

Each user has signed a non-disclosure agreement. The system is protected by a firewall, which prevents unauthorised access to the system from outside.

The data in the register is protected and processed in accordance with the provisions and principles of the Data Protection Act, the regulations of the public authorities and good data processing practices.

# Cookies

We use cookies on our website. A cookie is a small text file sent to a user's computer and stored there. Cookies do not harm users' computers or files. The primary purpose of using cookies is to improve and personalise the visitor's experience on the website and to analyse and improve the functionality and content of the website.

The data collected through cookies can also be used to target communications and marketing and to optimise marketing measures. A single user cannot be identified solely through the use of cookies. However, data obtained through cookies may be linked to information obtained from the user in other contexts, such as when the user fills in a form on our site.

Cookies are used to collect the following types of data:

- the visitor's IP address
- the time of the visit
- the browsed pages and page viewing times
- the visitor's browser

#### The rights you have

Users visiting our website have the option to block the use of cookies at any time by changing their browser settings. Most browsers allow you to disable the cookie function and delete cookies that have already been stored.

Blocking the use of cookies may affect the functionality of the site.

#### GOOGLE ANALYTICS

Usage statistics are collected from the website for the Google Analytics service, the purpose of which is to monitor, develop and plan the marketing of the website. The data collected cannot be traced back to a particular user or person.

In addition, the website uses Google Analytics Demographics to collect target group and subject data, which records information such as the age, gender and subject areas of the user. You can change the settings related to the collection of this information on your personal Google account at https://www.google.com/settings/ ads

If you wish, you can disable Google Analytics search tracking in Chrome.

#### Automatic processing and profiling

Not to be done.

#### The right of access, i.e. the right to have access to personal data.

The data subject has the right to access the data concerning them that has been stored in the register. The request for data access must be made in writing by contacting the data controller's customer service or the contact person for the register in Finnish or English. The request for data access must be signed or submitted from a verifiably identifiable email address.

The data subject has the right to prohibit the data controller from processing and disclosing their data for direct marketing, distance selling and direct selling, market research and opinion polling by contacting the customer service of the data controller.

#### The right to transfer data from one system to another

Data subjects have the right to transfer their data from one system to another. A transfer request can be addressed to the contact person for the register.

#### The right to request correction of data

Personal data in the register that is inaccurate, unnecessary, incomplete or out of date for the purpose of processing must be corrected, deleted or supplemented.

The request for correction must be made by a hand-signed written request to the organisation's customer service or the administrator of the personal data register, or from a verifiably identifiable email address.

The request must specify which data is to be corrected and on what basis this is to be done. The correction will be carried out without delay.

The person from whom the incorrect data was received or to whom it was disclosed will be notified of the correction of the error.

When a correction request is refused, the person responsible for the register issues a written certificate stating the reasons why the correction request was rejected. The person concerned may appeal against the decision and refer it to the data protection supervisory authority for resolution.

#### The right to restrict data processing

The data subject has the right to request the restriction of data processing, for example, if the personal data contained in the register is incorrect. The contact person is the person responsible for the register.

#### The right of objection

The data subject has the right to request personal data concerning them and the right to request the rectification or erasure of personal data. Requests can be addressed to the contact person for the Registry.

If you act as a contact person for a company or organisation, your data cannot be deleted during this time.

#### Right to lodge a complaint with the supervisory authority

As a data subject, you have the right to lodge a complaint with a supervisory authority if you consider that the processing of personal data relating to you infringes the General Data Protection Regulation (GDPR)

You can also lodge a complaint in the member state where you have your habitual residence or place of work.

The contact details of the national supervisory authority are: The Office of the Data Protection Ombudsman Visiting address: Lintulahdenkuja 4, FI-00530 Helsinki Postal address: P.O. Box 800, 00531 Helsinki

Telephone switchboard: 029 566 6700 Registry: +358 29 566 6768 tietosuoja@om.fi www.tietosuoja.fi

# Other rights related to the processing of personal data

The data subject has the right to prohibit the data controller from processing and disclosing their data for direct marketing and other marketing purposes, to request the anonymisation of their data where applicable, and to be completely forgotten.