



Visit Pyhä-Luosto ry's record of processing activities, 22 September 2023.

Description of file and record of processing activities regarding personal data in accordance with the EU General Data Protection Regulation (2016/679), the Data Protection Act (2018/1050) and the Personal Data Act (523/1999) (10)

Pursuant to the EU General Data Protection Regulation (GDPR) (2016/679) and the Data Protection Act (2018/1050), to the processing of personal data that takes place in connection with operations related to the establishment of a controller or processor located in the European Union, Finnish law is applied if the controller's place of business is located in Finland.

Visit Pyhä-Luosto ry's description concerning the customer database is available at <https://luosto.fi/> and <https://pyha.fi/>.

1. Controller

Name: Visit Pyhä-Luosto ry

Business ID: 1834713-3

Contact details:

info@pyha-luosto.fi

Luontotie 1, 98530 Pyhätunturi

2. Contact person

Manager of operations

Anu Summanen

Visit Pyhä-Luosto ry

Contact details:

info@pyha-luosto.fi

Luontotie 1, 98530 Pyhätunturi

3. Name of the register

Visit Pyhä-Luosto ry's customer database.

4. Legal basis for the processing of personal data:

The processing of customer data is based on the controller's legitimate interest or an agreement between the controller and the data subject.

5. Purpose of the processing of personal data (purpose of use of the register):

Distribution of Visit Pyhä-Luosto ry's newsletters for the management and development of customer relationship. The newsletters inform subscribers about news, offers, events and other topical issues.

6. Regular data source and data content of the register:

Information concerning customers is obtained from the customers themselves with the customers' consent. The controller processes the following information about customers:

- Customer's first and last name, telephone number, address, e-mail address.
- Customer feedback and complaint information, if any.
- The following information is stored about customers: e-mail address.

7. Withdrawal of consent to the use of data, and deletion of data

You can delete your subscription data at any time by unsubscribing via the unsubscribe link in the newsletter sent. Alternatively, you can ask Visit Pyhä-Luosto ry to remove your data from the service. Contact the controller's contact person specified in section 2.

8. Principles of register protection

The customer information is stored electronically in Visit Pyhä-Luosto ry's newsletter system, and only Visit Pyhä-Luosto ry employees and the newsletter system's service provider have access to the newsletter system. They use usernames and passwords.

9. Retention period of personal data

The data is stored in the service until the newsletter is discontinued or until the subscriber themselves cancels the subscription via the unsubscribe link at the end of the newsletter, requests Visit Pyhä-Luosto ry in writing to delete the data, or a defunct e-mail address is automatically deleted.

10. Rights of the data subject

Personal data is also processed on the basis of an agreement between the controller and the data subject (GDPR article 6(1)(b)). This basis for processing is explained in more detail in section 4 of the record of processing activities. When data is processed on the basis of a legitimate interest and an agreement, the data subject has the following rights:

The data subject's right of access to their own data

- The data subject has the right to request access to their personal data (right of inspection) in order to find out whether or not data concerning them is processed in the membership register.
- As a general rule, the data subject has the right to know what information concerning them has been stored in the customer register.
- The controller may request the data subject to sufficiently specify which data or processing operations the data subject's request concerns.
- Under the General Data Protection Regulation, the data subject's right to receive information may be restricted or denied if disclosure of the data would adversely affect the rights and freedoms of others. Such protected rights include the controller's trade secrets and another person's personal data. The data subject's right may also be restricted by national legislation (e.g. Data Protection Act).
- Access to your own data. You can access your own data stored in the newsletter system by contacting the controller's contact person specified in section 2.

Right to rectification

- On this basis, the data subject has the right to require the controller to rectify without undue delay inaccurate or incorrect personal data concerning the data subject.
- If you notice an inaccuracy, omission or error in your data, you can request the removal of the incorrect address and then subscribe to the newsletter again. Contact the controller's contact person specified in section 2.

Right to erasure

- At the request of the data subject, the controller must erase personal data concerning the data subject without undue delay if one of the following conditions is met:
 - o The personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed.
 - o The data subject objects to the processing of the personal data and there are no legitimate grounds for the processing.
 - o The data subject objects to the processing of personal data for direct marketing purposes.
- You can delete your subscription data at any time by unsubscribing via the unsubscribe link in the newsletter sent. Alternatively, you can ask Visit Pyhä-Luosto ry to remove your data from the service. Contact the controller's contact person specified in section 2.
- The personal data has been processed unlawfully.
 - o Even if one of the conditions is met, the data does not need to be erased if the processing is necessary, for example, for compliance with a legal obligation based on EU or national law applicable to the controller, or for the establishment, exercise or defence of legal claims.

Right to object to the processing of your data

- The data subject has the right to object to the processing of their personal data on grounds relating to their particular situation when the data is processed on the basis of legitimate interest.
- The data subject does not have the right to object to the processing of personal data when the processing is based on an agreement between the controller and the data subject.
- If the data subject has objected to the processing of their data on grounds relating to their particular situation, the data subject must specify the specific situation on the basis of which they object to processing based on legitimate interest.

- The controller may continue processing the data despite the objection if there are considerably important and justified legitimate grounds for the processing that override the interests, rights and freedoms of the data subject or if it is necessary for the establishment, exercise or defence of legal claims.
- The data subject has the right to object at any time to the use of personal data concerning them in direct marketing. If the data subject objects to the use of personal data for direct marketing, the data may no longer be processed for this purpose.
- If you wish to report a problem related to the processing of your personal data, please contact the controller's contact person specified in section 2.

Right to request restriction of processing

At the request of the data subject, the controller must restrict the active processing of personal data in the following situations:

- The data subject contests the correctness of the personal data, in which case the processing must be restricted until the controller can verify the correctness of the data.
 - The processing is unlawful and the data subject requests that the processing of the data be restricted instead of erasing the personal data.
 - The controller no longer needs the personal data in question for the purposes of the processing, but the data subject needs them for the establishment, exercise or defence of a legal claim, or the data subject has objected to the processing of the personal data (on the right to object, see above) and the assessment of whether the legitimate grounds of the controller override those of the data subject is ongoing.
 - As a rule, during the restriction of processing, the data may only be stored.
 - Data may also be processed for the establishment, exercise or defence of legal claims, for the protection of the rights of another natural or legal person or for reasons of important public interest. Before the restriction of processing is lifted, the data subject must be informed of it.
- If you wish to report a problem related to the processing of your personal data, please contact the controller's contact person specified in section 2.

Right to data portability

- To the extent that the data subject has provided personal data to the customer register that is processed by means of automated data processing and on the basis of an agreement between the controller and the data subject, the data subject has the right to receive such data mainly in machine-readable format and to have the personal data transferred directly from one controller to another, if technically feasible.

Requests related to the exercise of the rights of the data subject

- In questions related to the processing of personal data and in situations related to the exercise of personal rights, the data subject may contact the controller's contact person specified in section 2.
- A request to the controller concerning the right of inspection or other request concerning the exercise of the rights of the data subject must be made in writing either by e-mail or mail. The request can also be made in person at the controller's place of business. The controller may request the data subject to sufficiently specify which data or processing operations the data subject's request concerns.

Right to lodge a complaint with a supervisory authority

- The data subject has the right to lodge a complaint with a competent supervisory authority if the data subject considers that the controller has not complied with the applicable data protection regulations in its operations.

Access to your own data

- You can access your own data stored in the newsletter system by contacting the controller's contact person specified in section 2.

Rectification or completion of data

- If you notice an inaccuracy, omission or error in your data, you can request the removal of the incorrect address and then subscribe to the newsletter again. Contact the controller's contact person specified in section 2.

Restriction of processing

- If you have stated us that your data is incorrect, you have the right to request that its processing be restricted until the correctness of the data is verified.