

## **SUOMI CAMPING OY CUSTOMER REGISTER**

General information document as provided for in the EU General Data Protection Regulation concerning the processing of personal data in the customer register of Suomi Camping Oy

### 1. Controller

Suomi Camping Oy Haapaniemenkatu 7–9B FI-00530, Helsinki

### 2. Contact person for register-related matters

The contact person for matters related to the register and the exercise of data subjects' rights is Mira Bösch, tel. +358 20 719 9779, [myynti@suomicamping.fi](mailto:myynti@suomicamping.fi)

### 3. Register name

Customer register of Suomi Camping Oy

### 4. Legal basis for the processing of personal data

The processing of personal data stored in the customer register is based on a customer relationship between Suomi Camping Oy and consumer customers and corporate clients. The controller also processes data based on agreements concluded between the controller and data subjects. On this basis, personal data that is acquired from a customer as they make reservations for accommodation or other services or for invoicing purposes pertaining to accommodation and other services.

### 5. Purpose of processing of personal data

The purposes of processing personal data in the customer register include: - maintenance and development of customer relationship

- customer relationship communications
- handling of reservations made by a customer
- selling and provision of services
- processing of personal data for purposes related to payment, invoicing, as well as supervision of payments and collection
- marketing of services provided by the controller
- development of the controller's business activities and customer service

### 6. Processed personal data

The controller will process the following personal data concerning data subjects

- customer's first and last name, date of birth, telephone number, address, email address
- nationality
- reservation-related information
- Information regarding the customer's method of payment, invoicing information, information regarding possible delayed payments
- information on whether the customer has prohibited the use of their information for direct marketing purposes
- information on whether the customer has consented to electric direct marketing (SMS or email marketing)
- information on the use of services and purchases
- information regarding the customer's choices and requests (including special requests concerning accommodations, accessibility-related matters)
- possible customer feedback and complaints
- information regarding possible special diets

For corporate clients, the controller will process the following personal data:

- The name, address, email address, and telephone number of the contact person of the corporate client
- Information pertaining to prohibitions under law concerning direct advertising, remote sales, and other forms of direct marketing specified by the contact person

#### 7. Sources of personal data

Suomi Camping Oy receives the processed personal data from:

- The data subjects themselves
- Information provided during the use of services and while making reservations
- Information provided by third parties, such as information received from external booking services
- The controller may also produce personal data for the register itself

#### 8. Recipients or recipient groups of the personal data

Suomi Camping Oy uses an external service provider (Mailchimp) for direct marketing (email) that provides the controller with the software service required for the sending of direct marketing messages. As regards the stored information concerning customers, only the email address is relayed to the external service provider.

#### 9. Transfer of data outside EU

Register information is not disclosed to third parties, except for situations where such transfers are necessary due to actions by Finnish authorities.

In principle, the controller does not need to transfer your data outside of the European Union or the European Economic Area in order to provide the Service. Information produced for statistical purposes may be transferred onto service providers' platforms outside EU or EEA.

Suomi Camping Oy uses the Mailchimp service for its newsletters, which may lead to information being stored outside EU. Mailchimp has certified its compliance with the EU-US Privacy Shield Framework regulations ([www.privacyshield.gov/list](http://www.privacyshield.gov/list)). Further information on data protection in the service: [www.mailchimp.com/legal](http://www.mailchimp.com/legal). Personal data is protected in the manner required by the Personal Data Act.

#### 10. Personal Data Storage Period

Personal data of customers stored in the customer register will be processed for the duration of the customer relationship. Information may be removed from the register at the data subject's request or by Suomi Camping Oy without request. A subscription to the newsletter can be cancelled and/or personal information modified using the link included at the end of each newsletter or by contacting Suomi Camping Oy.

#### 11. On the rights of data subjects

Personal data stored in the customer register is processed on the basis of a legitimate interest of the controller (EU GDPR, Article 6, paragraph 1, point (e)). In this case, the legitimate interest is based on a customer relationship. Personal data is also processed based on a contract concluded between the controller and the data subject (EU GDPR, Article 6, paragraph 1, point (b)). This basis for processing is described in further detail in paragraph 4 of the privacy policy.

Where data is processed on the basis of a legitimate interest or contract, the data subject shall have the following rights:

- Data subject's right to access personal data

- The data subject shall have the right to request access to personal data concerning them (= right of access) in order to ascertain whether or not data concerning them is processed in the membership register.
- In principle, the data subject has the right to know which information concerning them is stored in the customer register. The controller may ask the data subject to sufficiently specify the information or processing measure the data subject's requests concerns.
- The right of the data subject to access information may be restricted or rejected under the General Data Protection Regulation if the provision of information would have a detrimental impact on the rights and freedoms of others. Such protected rights include, inter alia, business secrets of the controller and personal data of other people. The data subject's right may also be restricted by national legislation (such as the Data Protection Act).

#### Right to rectification of data:

- Pursuant to the right to rectification, the data subject has the right to demand rectification of any incomplete or incorrect data concerning them without undue delay.

#### Right to erasure

- The controller must erase personal data concerning a data subject without undue delay if any of the following conditions are met:
- the personal data is no longer needed for the purposes for which they were collected or for which they were otherwise processed
- the data subject objects to the processing of personal data and overriding legitimate grounds for the processing do not exist
- the data subject objects to the processing of personal data for direct marketing purposes (in this case, the processing of personal data is however possible for other purposes)
- personal data has been processed unlawfully

Even if one of the above conditions is met, erasure of the data is not necessary if the processing is, for example, required for compliance with a legal requirement based on applicable EU or national legislation that necessitates processing or for the establishment, exercise, or defense of legal claim.

#### Right to object to the processing of personal data:

- The data subject has the right, on grounds relating to their particular situation, to object to the processing of personal data concerning them where personal data is processed based on legitimate interest.
- The data subject shall not have the right to object to the processing of personal data if the processing is based on a contract concluded between the controller and the data subject.
- If a data subject has objected to the processing of personal data concerning them on grounds relating to their particular situation, the data subject must identify the particular situation based on which they are objecting to the processing of personal data based on legitimate interest. The controller may continue to process data despite objection if they are able to demonstrate compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the data subject or where processing is necessary for the establishment, exercise, or defense of legal claims.

- The data subject has the right to object at any time to the use of personal data concerning them for direct marketing purposes. If a data subject objects to the use of their personal data for direct marketing, the data may no longer be processed for such purposes.

Right to request the restriction of processing:

The controller must restrict the active processing of personal data at the data subject's request in the following situations:

- the data subject contests the accuracy of the personal data, which means that the processing must be restricted for a period enabling the controller to verify the accuracy of the personal data
- The processing is unlawful, and the data subject requests the restriction of processing of their personal data instead of the erasure of the data
- the controller no longer needs the personal data in question for the purposes of processing, but the data is still required by the data subject for the establishment, exercise, or defense of legal claims, or
- the data subject has objected to the processing of personal data (see above for the Right to Object to the Processing of Personal Data) and the assessment of whether the rights of the controller supersede the rights of the data subject is pending.

During the restriction of processing, only storage of data is primarily permitted. Data may be processed for the establishment, exercise, or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest. The data subject shall be informed by the controller before the restriction of processing is lifted.

Right to data portability:

Where the data subject has provided personal data to the customer register, which is processed using automated means and the processing is based on a contract concluded between the controller and the data subject, the data subject shall have the right to receive such personal data in a primarily machine-readable format and the right to transfer said data directly from one controller to another where technically possible.

#### 12. Right to lodge a complaint with a supervisory authority

The data subject has the right to lodge a complaint with a supervisory authority if they consider that the controller has not complied with the applicable data protection regulations in the course of their activities.

#### 13. Requests related to the exercise of data subjects' rights

With questions regarding the processing of personal data and in situations related to the exercise of the data subject's rights, the data subject may contact the controller's contact person mentioned in paragraph 2.

Requests concerning the right of access or the exercise of any other right of the data subjects must be made in writing to the controller by email or mail. Requests may also be presented personally at the controller's premises.

The controller may ask the data subject to sufficiently specify the information or processing measure the data subject's requests concerns.

In order to ensure that personal data is not disclosed to any other persons than the data subject themselves in relation to the exercise of data subjects' rights, the controller may ask the data subject to submit a signed request of access. The controller may also ask the person making the request to prove their identity using an official form of identification or another reliable method.