

**1. Name of the register**

District heating customer register

**2. Controller**

Nurmijärven Sähkö Oy

Kauppanummentie 1, FI-01900 Nurmijärvi, Finland

Business ID 0911384-5

switchboard +358 987 8071

**3. Contact information in data protection matters**

Nurmijärven Sähkö Oy / data protection

Kauppanummentie 1, FI-01900 Nurmijärvi, Finland

[asiakaspalvelu@nurmijarvensahko.fi](mailto:asiakaspalvelu@nurmijarvensahko.fi)

switchboard +358 987 8071

You can also submit a request regarding the rights of data subjects at our Kauppanummentie unit.

**4. Purpose of the register and grounds for processing**

The processing of electricity transfer customers' data is based on the controller's obligations related to the Energy Efficiency Act and other statutory obligations; the fulfilment of agreements and orders between the parties and the implementation of preceding measures at the customer's request as well as the legitimate interests of the controller and third parties, such as:

- managing, maintaining and developing the customer relationship, invoicing and monitoring and collection of payments
- implementation, maintenance, development and quality assurance of the services of the controller and its partners
- customer communications of the controller and its partners by letter, telephone, email, SMS or other electronic means, communication of information, market, opinion and customer satisfaction surveys, direct marketing as well as targeting and displaying advertising in the controller's own and other parties' internet and mobile services, and other communications with the customer
- analysis and profiling of the use of services, customers and customer relationships required for the aforementioned purposes
- monitoring and prevention of fraud, misuse and personal data and security breaches
- other similar purposes and tasks related to the management of the customer relationship

Customer data may also be processed for other purposes for which the customer has given consent.

**5. Data content of the register**

The data required for the purpose of use are stored in the register. The register may contain the following information about customers:

- basic information, such as names, consumer customer's personal identity code, first language, preferred language, age, gender, profession or title, delivery, invoicing and electricity use location addresses and other contact information
- basic information about the contact persons of corporate customers (such as information about the employer, task and position)
- information concerning agreements, orders, delivery, invoicing, payment and collection, information and user IDs necessary for customer identification and other similar transaction information
- technical and other information concerning the place of use of the service provided to the customer as well as information affecting the use of the service and its forecasting, such as information concerning household members, building and apartment, as well as actual service use and consumption data

- information about communication with the customer, such as customer communications, feedback, call recordings and marketing activities
- data on the use of the controller's newsletters, online services, mobile applications and advertising, such as browsing history and the IP address and other technical data of the customer's terminal device
- direct marketing prohibitions, electronic direct marketing consents, other prohibitions, restrictions and consents notified by the customer
- other data required for analysis and profiling and the results thereof
- any other data collected with the data subject's consent

## **6. Regular sources of information**

Customer register information and changes to it are obtained from the customer themselves and maintained in connection with invitations to tender, orders, agreements, other contact related to the customer relationship or in the controller's online service.

Data are collected in connection with the use of services and newsletters as well as the use of online and mobile services, by using cookies and similar usage tracking technologies.

The controller may collect data from other energy market parties in accordance with the Electricity Market Act and the rules on the exchange of information on the electricity market, or for the purpose of using the register or with the customer's consent.

The customer's information can be obtained, reviewed and maintained from credit information registers and the registers of the Digital and Population Data Services Agency, other authorities, Posti and the controller's partners and other reliable parties, when it is necessary for the purposes of the register or when the customer has given its consent.

## **7. Regular disclosure and transfer of data**

Information on electricity consumption and other information provided for in the Electricity Market Act is subject to the secrecy obligation provided for in the electricity market legislation. The controller may disclose said data to the controller's group companies, the authorities, electricity market parties and other parties only in situations permitted and required by law and on the basis of the rules on the exchange of information in the electricity market, or with the customer's consent. The controller may disclose other information to the controller's partners and other parties when it is necessary to fulfil the purposes of the register, for example, to fulfil the third-party services ordered by the customer from the controller or when the customer has given their consent to this.

For the purpose of the collection of unpaid invoices, individual pieces of data may be disclosed to the collection agency carrying out the collection measures.

The controller uses subcontractors in the operational, commercial or technical implementation of data processing tasks to the extent permitted by the Personal Data Act and other legislation. For this purpose, the data in the register may also be transferred for processing to a country outside of the EU/EEA. Unless the European Commission has confirmed that the level of data protection in the processing country is acceptable, the data controller shall enter into written agreements with subcontractors under the terms of the Standard Contractual Clauses approved by the European Commission (Decision C (2010)593) to ensure an adequate level of data protection.

## **8. Principles of data protection and data storage**

The register may only be accessed by those persons employed by the controller who need the data in order to carry out their duties. Access to the register requires a user-specific username and password. Access to the register ends when the person leaves the duties for which they have been granted access. The data in the register are backed up regularly. The register is also protected against unauthorised use by firewall and other information security software. Manually processed customer data are stored in locked and fireproof storage facilities.

When the customer relationship and the rights and obligations based on it have ended, the controller may store anonymised customer data that cannot be linked to the customer, erase the data or transfer the data permitted by Section 19 of the Personal Data Act to the controller's marketing register.

## **9. Your rights as a data subject in relation to the processing of your data**

You can make a request regarding the rights of data subjects, such as a request for information, through the channels mentioned in Section 3. You can also view your data yourself in our Online service. If necessary, we may ask you to specify your request. Please note that, for data security reasons, we must verify the identity of the person making the request before fulfilling the request, in which case we may require additional information or for the data subject to prove their identity, for example, with an identity document.

As a data subject, you have the following rights related to the processing of personal data under the General Data Protection Regulation:

### **Right to be informed about the processing of your personal data and to inspect the personal data concerning you**

You have the right to inspect the personal data collected about you once a year free of charge. If you submit a request for information more than once a year, we may charge a fee to cover the reasonable and direct costs resulting from the requests for information.

You have the right to be informed about the processing of your personal data. We aim to provide a comprehensive picture of the processing of personal data in our operations with descriptions of our data protection practices, such as privacy statements. In addition, you always have the right to ask additional questions about the processing of your personal data.

### **Right to rectification**

If our personal data concerning you contains inaccurate information, you have the right to request the rectification of the inaccurate information. If we rectify personal data based on your request, we will also notify all parties to whom incorrect data have been previously disclosed of the rectification in accordance with the General Data Protection Regulation, where possible.

### **Right to erasure**

You can request the erasure of your personal data in accordance with the General Data Protection Regulation, for example, if your data have been used unlawfully or if the data are no longer needed. However, there is no right to erasure of data, for example, if the processing is based on law or if the data are required for the establishment of, exercise of or defence against legal claims. The controller may refuse to carry out the erasure on grounds provided for by law.

### **Right to withdraw consent and prohibit direct marketing**

You can withdraw your consent to electronic direct marketing and other purposes at any time by notifying us of the withdrawal as set out in Section 3. You can also withdraw your consent to electronic direct marketing by using the withdrawal link in the direct marketing message. The withdrawal of consent does not affect the lawfulness of the data processing carried out before the withdrawal. You can also object to the use of your data for direct marketing (including related profiling).

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

For special reasons related to your personal situation, you also have the right to object to the processing of your personal data. In connection with the request, you must identify the specific situation on the basis of which you are objecting to the processing. In this case, we may no longer process your personal data unless there are compelling legitimate grounds for the processing which override your interests, rights and freedoms, or if the processing is necessary for the establishment of, exercise of or defence against legal claims. We may refuse to comply with a request involving objection on grounds provided for by law. Direct marketing can always be prohibited without justification.

### **Right to restriction of processing**

If you consider that we are processing your personal data unlawfully, they are incorrect or you have objected to the processing of your data, for example, you can ask us to restrict the processing of your personal data in accordance

with the General Data Protection Regulation. In this case, we may only process the data in limited situations, such as with your consent, for the establishment of, exercise of or defence against legal claims, for reasons of public interest or to protect another person. In the event of a restriction of data, we will notify all those to whom the data have previously been disclosed of the restriction in accordance with the law, where possible.

#### **Right to transfer personal data to another controller**

You have the right to receive the personal data you have provided to us in a structured, commonly used and machine-readable format and, if you wish, to transfer these data to another controller, if this is technically feasible. The request may only concern personal data that are processed automatically and whose processing is based on either your consent or an agreement. The data transfer must not adversely affect the rights and freedoms of third parties.

#### **Right to lodge a complaint about the processing of personal data with a supervisory authority**

You have the right to lodge a complaint with a competent supervisory authority, in particular in the EU Member State in which you have your habitual residence or place of work or where the alleged infringement has occurred, if you consider that the processing of personal data concerning you infringes data protection legislation. In Finland, the supervisory authority is the Office of the Data Protection Ombudsman (P.O. Box 800, FI-00531 Helsinki, email: [tietosuoja@om.fi](mailto:tietosuoja@om.fi)). You can also contact the Office of the Data Protection Ombudsman for more information about the processing of personal data and your rights.