

1. Name of the register

Nurmijärven Sähkö Group's marketing 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

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 personal data is based on the controller's legitimate interest. The purpose of the processing is direct marketing, remote sales as well as opinion and market surveys of Nurmijärven Sähkö Oy and its group companies and partners. The data may also be used to plan and develop the controller's business and services.

5. Data content of the register

The register may contain the following information about potential customers of the controller:

- name, postal address, email addresses, telephone numbers, other contact information
- age, gender, native language
- title or profession
- one other piece of identification information concerning the data subject
- basic information about the contact persons of corporate customers (such as information about the employer, tasks and position in the business community)
- offer history and other marketing activities carried out
- direct marketing prohibitions, electronic direct marketing consents, other prohibitions, restrictions, consents and selections notified by the data subject
- with the data subject's consent, other data, such as electronic newsletter subscriptions and their reading and use, i.e. data concerning the browsing history of the controller's online service and analysis and profiling data

6. Regular sources of information

Personal data may be collected when the data subject reads newsletters and uses the controller's online services or participates in events organised by the controller, or otherwise directly from the data subject.

After the end of the customer relationship, the controller may transfer the basic data of the data subject permitted by Section 19 of the Personal Data Act from the controller's customer register to the marketing register.

In addition, information can also be collected and updated from the marketing prohibition registers maintained by ASML Finland's Asiakkuusmarkkinointiliitto and from the registers of Posti, the Digital and Population Data Services Agency and other reliable public and private parties.

7. Regular disclosure and transfer of data

The controller may disclose data in the register for the direct marketing purposes of its partners, unless the data subject has prohibited such processing or disclosure of its data.

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.

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). You can also contact the Office of the Data Protection Ombudsman for more information about the processing of personal data and your rights.