District heating customer register description

updated on 29 October 2026

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
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

When you contact our customer service by phone, we record the calls to ensure and improve the quality of our customer service and to manage customer relationships (such as handling complaints and customer feedback). Data related to the customer relationship also includes other information connected to communications, such as data from electronic contact forms and chat messages. The legal basis for this processing is our legitimate interest (Article 6(1)(f) of the General Data Protection Regulation), based on the purposes for data processing. Processing this data is necessary for us to handle and respond to inquiries, feedback, and complaints received by our customer service, as well as to improve our operations.

As part of our efforts to improve customer service, we utilize artificial intelligence (AI) tools in the handling of customer contacts. AI is used, for example, to generate transcripts of calls and conversations, to summarize and categorize customer inquiries, and to record relevant personal data into our customer information system. While the AI serves to support our customer service representatives, the representatives always review the summaries, information, and categorizations produced by the AI before they are saved or used in the context of customer service. The customer service representative makes the final decisions regarding the processing. The use of AI is based on our legitimate interest in streamlining service processes and ensuring a high-quality customer experience.

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.

We use service providers to process personal data in connection with the following services:

- maintenance of customer data and invoicing, customer communications, call recordings, and chat
- maintenance of the Online service
- management of newsletter mailing lists and the distribution of newsletters
- conducting customer satisfaction surveys

- maintenance and processing of data regarding event participants.

In accordance with a data protection agreement, each service provider processes personal data only to the extent necessary to provide the service in question, for example, in connection with system maintenance or troubleshooting.

The controller uses subcontractors in the operational, commercial or technical implementation of data processing tasks to the extent permitted by data protection 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 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 law to the controller's marketing register.

We retain personal data for as long as is necessary based on the customer relationship, or until the data subject requests its deletion. In such cases, however, the register will continue to hold data required by law (such as accounting legislation) or by the contractual relationship, as well as a record of the deletion request. Under energy sector legislation, Nurmijärven Sähkö is obligated to collect and retain a customer's personal data (information regarding the contract and the customer relationship) for the duration of the customer relationship and for 10 years following its termination. Call recordings are retained for 24 months. We take reasonable measures to ensure that we do not retain personal data in the register that is outdated, incorrect, or incompatible with the purposes for which it is processed.

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.