



Privacy policies

31/01/2020

Privacy policies

Controller

City of Raahe / Raahe Region Development

Rantakatu 5 D 2nd floor, 92100 Raahe

PO Box 62, 92101 Raahe

Business ID 1791817-6

Scope

This statement describes the practices according to which the Controller collects, processes, uses, protects and discloses the personal data of its customers and presents the data subject's rights.

Limitations

This statement does not apply to third-party websites, applications, registers or services that may be available through additional services provided by partners in the services of the Controller. By using services provided by a partner, the customer leaves the Controller's service, which means that a third party may collect and share information it collects on the customer.

The controller recommends that you consult the privacy practices of third-party services before you allow your personal information to be collected and used in those services.

Principles of data protection

The controller's data protection principles include the disclosure of the legality basis and purpose of data processing, the disclosure of data to be collected and processed, the technical and administrative protection of data, and the legal possibility of checking and requesting changes to data.

Personal data registers

Customer register, newsletter subscriber register, and registration and participant lists.



Protection of data in registers

Electronic material

Electronically processed data contained in the register is protected by firewalls, passwords and other technical means generally acceptable in the field of information security.

Manually maintained material

Manually maintained material is kept in premises where access to unauthorised persons has been prevented by access control in order to investigate and verify possible physical security breaches.

Administrative protection of registers

Access rights to information systems and files and access to the information contained in the registers are based on personal access rights. Access rights are granted on a task-specific basis, and the use of data is based on the performance of tasks.

Users' access rights are regularly monitored and the creation of risky combinations of access rights is prohibited. The access rights of employees who have left the controller's service will be removed from all systems and registers at the end of the employment relationship.

Information security and privacy awareness of employees processing personal data is regularly maintained. Each year, employees undergo mandatory information security and data protection training, and in order to pass this training, the employee must pass a test on the subject matter.

Rights of data subjects

In accordance with sections 15-22 of the European Union's General Data Protection Regulation, the data subject has the right to:

1. check their personal data,
2. correct data,
3. remove data,
4. restrict processing, and
5. transfer data from one system to another.

The data subject has the right to access data concerning them that are stored in the Controller's information systems and manually processed data.

The exercise of some of the data subject's rights may be restricted by another mandatory legislation on the basis of which the Controller has the right and obligation to reasonably refuse to correct, delete,



restrict or transfer data from one system to another. An example of such legislation is, for example, the Accounting Act, which provides for the retention of documents, regardless of the rights granted by the data subject in the GDPR.

The request for checking and changing data must specify the personal data to be checked and provide the name of the register to which the request applies. Requests for checking data are submitted in writing on a signed, standard form at the registry of the City of Raahe at Rantakatu 50, 92100 Raahe.

Reporting practices for privacy breaches

The controller shall notify the data subject if the breach is likely to pose a high risk to the subject's rights and freedoms. The notification describes the nature of the data breach and the measures taken as required by law.

The information security authority is notified within 72 hours of the breach as specified in legislation if the data protection violation is likely to pose a risk to the rights and freedoms of a natural person. The notification describes the nature of the data breach and the measures taken as required by law.

Amendment of the privacy statement

The controller continuously develops its operations and reserves the right to amend this privacy statement by notifying it in its electronic services and in connection with other customer communications. Changes may be based on changes in legislation and the implementation of the requirements resulting from them. You can find an up-to-date version of this document at www.raahenseudunkehitys.fi.



Information on the personal data file

Informing the data subject of the controller, EU General Data Protection Regulation (2016/679).

Name and maintenance system of the register

Customer register

Controller

City of Raahe / Raahe Region Development
Rantakatu 5 D 2nd floor, 92100 Raahe
PO Box 62, 92101 Raahe
Business ID 1791817-6

Contact person

Jussi Kemilä
Rantakatu 5 D, 2nd floor, 92100 Raahe
040 830 3018
jussi.kemila@raahe.fi

Data Protection Officer

Aleksi Siipo
Ratakatu 1, 84100 Ylivieska
040 646 0230
tietosuoja@jict.fi

Legal basis and purpose of the processing of personal data

The processing of personal data is based on consent, agreement or a legitimate interest based on an appropriate connection between the parties (customer relationship management).

The data is used for the performance of customer relationships and the duties of the Controller, the provision and performance of services, and the imposition of fees for services. The data is also used to share information about services, news, projects and special events as well as the products and services of partners (if direct marketing is not prohibited).

The information is used to develop operations, including the development of new services, the implementation of customer surveys, as well as sales, marketing and advertising and the assessment of their effectiveness. The data is also used to maintain, manage and develop services, online services and other technologies.



Personal data can also be used in other ways, which are reported when the data is collected or when consent is requested for their processing.

Data content of the register

The following data or combinations of data are stored on the data subject:

- the names of the contact persons and the necessary organisational information,
- contact details (address, telephone number, e-mail address),
- address of a website or social media pages,
- customer relationship management information generated in customer service situations and
- direct marketing authorisations and prohibitions.

Regular data sources

The controller stores information related to customer relationships at the beginning of the customer relationship. Data is collected when the customer uses the Controller's services, registers for or participates in organised events, competitions or prize draws, subscribes to a newsletter or otherwise contacts the Controller.

Information is collected from public official registers, such as the Finnish Patent and Registration Office's Business Information System (BIS) and otherwise publicly available sources of information.

The information provided directly by the customer and information collected from other sources can be combined.

Regular disclosure of data

The controller does not sell, rent or regularly disclose personal data. The controller discloses the data only as described in this statement.

Personal data may be disclosed to partners for the purpose of providing the service or receiving funding (e.g., funding authorities for development projects, ELY Centre, Leader Association, Finnvera, banks and other funding providers and external experts).

The controller shall have the right to use or disclose data when necessary in relation to legislation, statute or a request from a judicial or administrative authority, for the protection of technology, for the defence of or for the purpose of presenting legal claims, for the protection of the rights, interests or security of the organisation, employees or the general public, or for the purpose of investigating fraud, other crime or violation of the rules.



Transfer of data outside the EU or EEA

Data will not be transferred or disclosed outside the EEA (European Union common market includes the EU Member States, Iceland, Liechtenstein and Norway).

Data disclosure practices

The data subject's data is disclosed without a separate authorisation for the implementation of the agreement between the customer and the partner for the purpose of obtaining a service or funding.

For other partners, such as lawyers, consultants, etc., the customer is asked to give separate consent to the disclosure of the information.

Information is disclosed to tax authorities, pension insurance companies, insurance companies, trade unions, the Social Insurance Institution (Kela) or earnings-related pension funds without the client's authorisation or consent when the disclosure of information is specified in legislation.

Retention and deletion of data

The data will only be stored for as long as the data can be considered necessary for the purposes described herein.

Project-related information is retained until the dates specified in the project decisions (10 years after the end of the project).

The aim is to keep personal data correct and up-to-date by deleting unnecessary data and updating outdated data.



Information on the personal data file

Informing the data subject of the controller, EU General Data Protection Regulation (2016/679).

Name and maintenance system of the register

Newsletter subscriber register

Controller

City of Raahe / Raahe Region Development
Rantakatu 5 D 2nd floor, 92100 Raahe
PO Box 62, 92101 Raahe
Business ID 1791817-6

Contact person

Aira Meriruoko
Rantakatu 5 D, 2nd floor, 92100 Raahe
040 135 7027
aira.meriruoko@raahe.fi

Data Protection Officer

Aleksi Siipo
Rantakatu 1, 84100 Ylivieska
040 646 0230
tietosuoja@jict.fi

Legal basis and purpose of the processing of personal data

The processing of personal data is based on consent, agreement or a legitimate interest based on an appropriate connection between the parties (customer relationship management).

The data is used to share information about services, projects and special events as well as the products and services of partners (if direct marketing is not prohibited).

The information is used to develop operations, including the development of new services, the implementation of customer surveys, as well as sales, marketing and advertising and the assessment of their effectiveness. The data is also used to maintain, manage and develop services, online services and other technologies.



Data content of the register

Email address

Regular data sources

Data are collected from the following sources:

- the controller's customer register (if email marketing is not prohibited), and
- information provided by the data subject (ordering a newsletter).

Regular disclosure of data

The controller does not sell or regularly disclose personal data.

The controller shall have the right to use or disclose data when necessary in relation to legislation, statute or a request from a judicial or administrative authority, for the protection of technology, for the defence of or for the purpose of presenting legal claims, for the protection of the rights, interests or security of the organisation, employees or the general public, or for the purpose of investigating fraud, other crime or violation of the rules.

Transfer of data outside the EU or EEA

Data will not be transferred or disclosed outside the EEA (European Union common market includes the EU Member States, Iceland, Liechtenstein and Norway).

Data disclosure practices

Information is disclosed to authorities without the client's authorisation or consent when the disclosure of information is specified in legislation.

Retention and deletion of data

The data will only be stored as long as the data can be considered necessary for the purposes described here, or when the data subject cancels the subscription to the newsletter or prohibits e-mail marketing.



Information on the personal data file

Informing the data subject of the controller, EU General Data Protection Regulation (2016/679).

Name and maintenance system of the register

Registration and participant lists

Controller

City of Raahen / Raahen Region Development
Rantakatu 5 D 2nd floor, 92100 Raahen
PO Box 62, 92101 Raahen
Business ID 1791817-6

Contact person

Jussi Kemilä
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Data Protection Officer

Aleksi Siipo
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040 646 0230
tietosuoja@jict.fi

Legal basis and purpose of the processing of personal data

The processing of personal data is based on the consent of the data subject and a legitimate interest based on an appropriate connection between the parties (customer relationship management).

The personal data of the registration and participant lists of events organised by the controller (different events, coaching, workshops, seminars, topical information, etc.) are used for organising events (information on participants), delivering materials to be distributed, and carrying out other surveys related to feedback or event.

The data is used to update the Controller's customer register data. The data may also be used in other ways, which are explained when the data is collected or when consent is requested for their processing.

Personal data is used for project management as required by the funding authority.



Data content of the register

The following data are collected on the data subject:

- first and last name,
- the name of the organisation,
- phone number and
- email address.

Regular data sources

Information provided by the data subject.

Regular disclosure of data

The controller does not sell or regularly disclose personal data. Data is disclosed from the register as required by the funding authorities of the projects managed by the Controller.

The controller shall have the right to use or disclose data when necessary in relation to legislation, statute or a request from a judicial or administrative authority, for the protection of technology, for the defence of or for the purpose of presenting legal claims, for the protection of the rights, interests or security of the organisation, employees or the general public, or for the purpose of investigating fraud, other crime or violation of the rules.

Transfer of data outside the EU or EEA

Data will not be transferred or disclosed outside the EEA (European Union common market includes the EU Member States, Iceland, Liechtenstein and Norway).

Data disclosure practices

Information is disclosed to authorities without the client's authorisation or consent when the disclosure of information is specified in legislation.

Retention and deletion of data

The data will only be stored for as long as the data can be considered necessary for the purposes described herein.

Project-related information is retained until the dates specified in the project decisions (10 years after the end of the project).