

## PRIVACY POLICY

## EU General Data Protection Regulation (EU) 2016/679

Date of Preparation: 20.8.2024

1. Name of the register: Contact Information Register for the SISU Business Project of Leader Viisari ry

2. Data Controller: Leader Viisari ry,  
Virastotie 2, 43100 Saarijärvi  
viisari (at) saarijarvi.fi

3. Person Responsible for the Register:  
Sanna Kiuru, Executive Director, Leader Viisari ry  
0400 418 055  
sanna.kiuru (at) saarijarvi.fi

4. Contact Person for the Register:  
Ilona Ukkonen, Project Manager, Leader Viisari ry  
040 820 1926  
ilona.ukkonen (at) saarijarvi.fi

5. Data Protection Officer Appointed by the Organization:  
Sanna Kiuru, Executive Director, Leader Viisari ry  
sanna.kiuru (at) saarijarvi.fi

### 6. Purposes and Legal Basis for Processing Personal Data

#### A) Purposes of Processing:

The contact information in this register is used for communication related to the SISU Business project. Invitations to events organized by the project and other information about the project may be sent to the contacts.

The collection of this data is based on the user's consent, which is obtained when the individual fills out the registration form.

#### B) Legal Basis:

The data subject has given consent for the processing of their personal data for one or more specific purposes.

### 7. Content of the Register (Description of Data Subject Groups and Categories of Personal Data)

The information collected in the register may include the individual's first and last name, email address, postal address, phone number, the organization represented by the individual, and billing information.

### 8. Sources of Personal Data

The information is obtained through personal contact, email, or the registration form.

#### 9. Disclosures of Personal Data:

Personal data is not disclosed to third parties.

#### 10. Transfer of Data Outside the EU or EEA:

Personal data is not regularly disclosed. Personal data is not transferred outside the European Union or the European Economic Area.

#### 11. Data Retention Periods:

Personal data is generally retained as long as it is needed for the intended purpose and thereafter as long as required or permitted by law, or as necessary for internal reporting and accounting. We will delete personal data after the aforementioned retention period has expired or when the user requests us to delete their personal data.

#### 12. Register Maintenance Systems and Data Protection Principles

##### A. Electronic Maintenance Systems

The register is maintained as an Excel spreadsheet located on a network drive. Only the staff of Viisari have access to the network drive.

##### B. Manual data

If manual data is needed, appropriate protection and destruction of the data will be ensured when manual data is no longer required.

#### Data Protection Principles

##### Electronic Data

Information technology devices are located in secure and monitored premises. Access rights to customer information systems and files are based on personal access rights, and their use is monitored. Access rights are granted based on the specific task. Each user agrees to a confidentiality commitment regarding data and information systems

#### 13. Right to Access Data:

The data subject has the right to obtain confirmation from the data controller as to whether or not personal data concerning them is being processed, and, if so, access to the personal data. The data controller must provide a copy of the personal data being processed. If the data subject requests additional copies, the data controller may charge a reasonable fee based on administrative costs.

The data controller must provide the information without undue delay and in any event within one month of receiving the request. This period may be extended by up to two months if necessary, taking into account the complexity and number of requests. The data controller must inform the data subject of such an extension within one month of receiving the request, along with the reasons for the delay. If the data controller does not take action based on the data subject's request, the data controller must inform the data subject without delay and at the latest within one month of receiving the request, of the reasons for not taking action, and on the possibility of lodging a complaint with a supervisory authority

and seeking a judicial remedy. Requests for access to one's own data and information provided under Articles 13 and 14 of the EU General Data Protection Regulation, and all information and actions under Articles 15–22 and 34, are free of charge. If the data subject's requests are manifestly unfounded or excessive, particularly because of their repetitive nature, the data controller may either:

- a) charge a reasonable fee considering the administrative costs of providing the information or communication or taking the requested action; or
- b) refuse to act on the request. In such cases, the data controller must demonstrate the manifestly unfounded or excessive nature of the request. Data access requests should be addressed to the contact person for the register.

#### 14. Right to Rectify Data

The data subject has the right to request that the data controller corrects, without undue delay, inaccurate and incorrect personal data concerning them. The data subject also has the right to have incomplete data completed, including by providing a supplementary statement. Whether the data is incomplete will be determined considering the purpose of the processing of personal data in the register. If the data controller does not accept the data subject's request for correction, they must provide a written statement explaining the reasons for not accepting the request and informing the data subject of their right to lodge a complaint with a supervisory authority and seek other legal remedies. Requests for rectification should be addressed to the contact person for the register.

#### 15. Right to Lodge a Complaint

The data subject has the right to lodge a complaint with a supervisory authority, particularly in the Member State where their habitual residence, place of work, or the place where the alleged infringement occurred if the data subject considers that the processing of personal data relating to them infringes this Regulation, without prejudice to any other administrative or judicial remedies. The right is based on Article 77 of the EU General Data Protection Regulation (2016/679).

#### 16. Other Possible Rights

Requests should be addressed to the contact person for the register.

#### **Right to Erasure (Article 17 of the GDPR):**

The data subject has the right to obtain from the data controller the erasure of personal data concerning them without undue delay, provided that one of the conditions laid down in Article 17(1) of the GDPR is met. The right to erasure does not apply, for example, where the processing is necessary for compliance with a legal obligation or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller.

#### **Right to Restrict Processing (Article 18 of the GDPR):**

The data subject has the right to obtain from the data controller the restriction of processing where one of the conditions listed in Article 18(1) a)–d) of the GDPR is met.

**Right to Object (Article 21 of the GDPR):**

The data subject has the right to object, on grounds relating to their particular situation, at any time to processing of personal data concerning them which is based on the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller. The data controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the data subject.

Where personal data is processed for direct marketing purposes, the data subject shall have the right to object at any time to the processing of personal data concerning them for such marketing, including profiling to the extent that it is related to such direct marketing. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

**Right to Data Portability (Article 20 of the GDPR):**

The data subject shall have the right to data portability only where the processing is based on consent or a contract and where the processing is carried out by automated means. The data subject's right to data portability does not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller. Where processing is based on consent, the data subject has the right to withdraw their consent at any time.

**Supervisory Authority:**

Office of the Data Protection Ombudsman

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