

# PRIVACY STATEMENT- ENROLMENT AND SURVEY REGISTER

The General Data Protection Regulation (GDPR) (EU) 2016/679

Drafted 21.05.2018

## **1. Name of register**

Register for surveys, inquiries and event enrolments

## **2. Data controller**

Name

Gaia Consulting Oy

Address

Bulevardi 6 A, 00120 Helsinki, Finland

E-mail address: info@gaia.fi

Switchboard tel.no. +358 (0)9 6866620

## **3. Point of contact in matters related to register**

Name

Office Manager Hannele Kiuru

## **4. Purpose of personal information processing and basis for processing**

Personal information is dealt when collecting information through different surveys and from participating to events to preparing to organising an event. Information given might be used later for business to business marketing purposes at Gaia Consulting Oy if the data subject allows it.

The juridical basis for processing is person's own consent. The consent is given when giving the information in a survey or when giving the information for organizing an event. The consent for business-to-business marketing is given with a separate check box or similar in the enrolment list.

## **5. Data content of register**

Personal information:

Name, e-mail address, phone number, organization, title, food allergies, other possible information concerning the content and organizational matters of an event, the other information asked in a survey.

## **6. Regular sources of data**

Information is received upon registration by the person.

Gaia employees can control, add or amend registered information.

## **7. Recipients and recipient categories**

Personal information is not disclosed to third parties.

## **8. Personal information dealing platform**

Webropol Oy, Real Humap Software Oy, Poutapilvi Oy

## **9. Principles for protecting the register**

### **A. Access to register**

Gaia's personnel has access to the enrolment register. Regarding confidential surveys, the access is restricted to those entitled to it.

### **B. Processing of personal information**

The contracts about appropriate processing of the data that are required by the directive are made with the data processors, and the parties are responsible for following the contract in their operations.

### **C. Manual material**

Any material to be retained manually is exceptional. Every employee with access to the material takes care of the data with precaution and makes sure that the data is not disclosed to third parties. Accordingly, when the data is it is not any more needed it will be erased.

### **D. Data processing in the operating system**

The employees handling personal information are responsible for their own acts and operations according to the agreements and confidentiality obligations they have undertaken.

Employees having access to the operating system will follow Gaia's ICT safety policy when dealing with data. According to the ICT safety policy personal information is not dealt in public places or sites. Electronic data content of the register is not copied unless exceptionally and specifically determined. Electronic copies are stored appropriately and destroyed immediately when they are not needed.

## **10. Definition of retention period of personal information**

Information is gathered when replying to a survey or when enrolling to an event. If the data subject does not give permission for the personal information to be used for marketing purposes, that data will be erased after event has taken place. Other information will be transmitted to the customer register. The information of surveys will be removed after the project is completed.

## **11. Data subject's rights**

### **11.1. Right to obtain access to the personal information**

The data subject shall have the right to require a confirmation about whether his or her personal information is processed or not. If personal information is processed, the data subject has the right to obtain access to the personal information to acquire all other information written in this statement. The request to obtain the named access shall be done to the contact person of the data controller.

#### **11.2. Right to require the rectification of data**

The data subject shall have the right to require the data controller, without any undue delay, to rectify deficient or erroneous piece of information found in the register related to the data subject. Moreover, the data subject has the right to receive an extract of the personal information rectified and completed for example by receiving a supplement from the data controller.

The data subject has the right to acquire correction of his or her information in the register. Correction request shall be done to the contact person of the data controller.

#### **11.3. Right to erase of data ("right to be forgotten")**

If the data subject objects the processing of their personal information, the data is removed from the data content. In this case, one is required to sort out the details off the event by him or herself.

Under the above-named circumstances, the claim of the data subject to be erase their personal shall be submitted in written to the contact person of the data controller.

#### **11.4. Right to restriction of processing**

The data subject shall have the right to require the data controller to restrict the processing of their personal data for instance in the following circumstances is:

- a) data subject claims that their personal information is inaccurate. In this case the data processing of the personal data is restricted for a period during which the data controller can make sure the accuracy of the data.
- b) processing of data is against law and the data subject objects the erasure of personal data and instead claims restriction of data processing.
- c) data controller does not any more have need of the personal data in the original purpose, but the data subject needs the data to be claimed, presented or defended when lodging a complaint.
- d) data subject has objected the processing of personal information against 21 Art. 1 awaiting the proof to verify if the justification of the data controller overrules the justified grounds of the data subject.

Under this circumstance the claim by the data subject to restrict data processing shall be submitted in written and with justification to the contact person of the data register.

#### **11.5. Right to object to the processing of personal information**

The data subject shall have the right, in connection with their personal specific circumstances, to object to processing measures of the data controller at the data subjects' personal information. The data controller may not extend the data processing unless the data processing can be proved to be based upon the data controller's legitimate ground and that there lies a significant, justified reason which overrules the interests, rights and exemption of the data subject or that the act is necessary for grounds stipulated under a juridical claim or defense.

Under this circumstance the claim by the data subject to restrict data processing shall be submitted in written and with justification to the contact person of the data register.

In this case, the data subject is required to sort out the details of the event or similar by himself/herself for enrolment purposes or not to enrol.

#### **11.6. Right to transmit data from one system to another**

Section is not relevant concerning this register's use cases.

#### **12. Right to lodge a complaint with the supervisory authority**

Every data subject has right to lodge a complaint with the supervisory authority. In Finland the complaint it to be submitted to the office of the Data protection Ombudsman.

Office of the Data Protection Ombudsman

PO Box 800

00521 Helsinki, Finland

E-mail: tietosuoja@om.fi

Switchboard: +358 (0) 29 56 66700

Fax: +358 (0) 29 56 66735

#### **13. Risks related to the personal information with the data controller**

The content of the register is not particularly vulnerable, and the register is not subject to significant risks considering current methods of handing registered data as well as the operating model.

As part of the design and development of operations, the idea of built-in security is implemented in the selection of systems and in the planning of the processing of registers.

