

## Privacy statement – Red Cross Bumerang Keyring Register

1 Data controller	Finnish Red Cross Tehtaankatu 1 A 00140 Helsinki, Finland Phone: +358 20 701 2000
2 Contact details in matters concerning the register	Finnish Red Cross Tehtaankatu 1 A 00140 Helsinki, Finland Phone: +358 20 701 2000 <a href="mailto:tietosuoja@redcross.fi">tietosuoja@redcross.fi</a>
3 Name of register	Finnish Red Cross / Bumerang Keyring Register
4 The purpose of processing personal data	<p>The Keyring Register contains personal data on customers who have registered as users of the Bumerang Keyring Service for the purpose of having lost keys returned to them via the service.</p> <p>The personal data in the customer register is used for the following purposes:</p> <ul style="list-style-type: none"> <li>• customer communications</li> <li>• customer relationship management and development, follow-up offer on the key security service</li> <li>• customer relationship profiling and segmentation</li> <li>• management of customer data and customer history</li> <li>• provision of support and information services, management of service measures and quality assurance</li> <li>• statistics and monitoring</li> <li>• direct marketing and distance selling, such as digital and product marketing</li> <li>• market research or opinion polls</li> <li>• communications and marketing.</li> </ul> <p>Personal data may be processed by third parties for purposes permitted by applicable legislation, including marketing, distance selling, market research and opinion polls. These third parties may be advertising agencies, printing houses or similar partners that promote the register’s operating principle and whose purpose for using the personal data is consistent with those of the FRC.</p> <p>Personal data is stored in the customer register for two (2) years from the end of the key security service. Payment data is stored for six (6) years in accordance with the Accounting Act.</p>
5 Data content of the register	<p>The following data may be processed in the register:</p> <ul style="list-style-type: none"> <li>• identification data</li> </ul>

	<ul style="list-style-type: none"> <li>○ names: first name and last name</li> <li>○ contact details: <ul style="list-style-type: none"> <li>▪ address: postal code, city, street address</li> <li>▪ telephone number</li> <li>▪ email address</li> </ul> </li> <li>○ user language</li> <li>○ customer number</li> <li>○ key tag number</li> <li>○ marketing authorisation</li> </ul> <ul style="list-style-type: none"> <li>● customer relationship data <ul style="list-style-type: none"> <li>○ usage history of the key security service</li> <li>○ product purchases</li> <li>○ campaign and contact information</li> </ul> </li> <li>● data concerning the use of online shop services <ul style="list-style-type: none"> <li>○ cookie data</li> <li>○ log data</li> <li>○ session identifiers</li> <li>○ IP addresses</li> <li>○ payment and transaction data.</li> </ul> </li> </ul> <p>The FRC only collects data that is necessary for the FRC’s operations and the purposes of processing data, which has a legal basis. Any data no longer necessary for its original purpose, as well as any outdated data and data that no longer has any other grounds for being processed, is anonymised or disposed of in a secure manner.</p>
<p>6 Regular data sources</p>	<p>Customer data is collected for the register in connection with product and service purchases and payment transactions from customers themselves. Personal data is received and updated regularly via Posti’s personal data updating service.</p> <p>Cookies The FRC website uses cookies. Cookies are small text files that are sent to a user’s computer and stored there in order to enable the website administrator to recognise frequent visitors to the website, make it easier for users to log in and facilitate the compiling of data sets about visitors. This feedback allows the FRC to continuously improve the content of its website. Cookies do not harm the users’ computers or files. The FRC uses them to provide users with information and services that are customised to the individual’s needs.</p> <p>If a user who visits the FRC website does not want the FRC to collect the data mentioned above through cookies, their use can be disabled in the browser settings. However, cookies may be necessary for the appropriate operation of some websites administered or services offered by the FRC, which is why the FRC does not guarantee the functionality of all services if the cookie function is disabled.</p>
<p>7</p>	<p>As a rule, the personal data of data subjects is not disclosed to third parties.</p>

<p>Regular disclosures of data</p>	<p>A data subject's personal data may be transferred to the FRC's direct marketing register. A data subject's personal data may be disclosed to cooperation partners who participate in the implementation of the FRC's marketing for the purpose of forming target groups in the marketing partners' services.</p> <p>Personal data is only disclosed to the authorities if required by law, for example for the investigation and prevention of misuse.</p>
<p>8 Transfer of data outside the EU or EEA</p>	<p>No personal data is transferred outside the areas of EU Member States or the European Economic Area.</p>
<p>9 Data protection principles of the register</p>	<p>Manual material: Manual material is stored in locked facilities. Access to the work spaces is monitored with access passes.</p> <p>Digital material: Systems containing personal data may only be used by employees whose work role gives them the right to process personal data. Each user has their own user ID and password to the system. Access to the work spaces is monitored with access passes. The data is collected into databases that are secured with firewalls, passwords and other technical means. Databases and their backup copies are located in locked rooms, and the data may only be accessed by specific individuals, named in advance.</p>
<p>10 Rights of data subjects</p>	<p>Data subjects have the right to:</p> <ul style="list-style-type: none"> <li>• request a copy of their personal data</li> <li>• request that their personal data be amended or deleted, unless applicable data security regulations require that the data be retained</li> <li>• request restrictions on the processing of their personal data or oppose this processing</li> <li>• request that their personal data be transmitted from one system to another, in accordance with applicable data security legislation</li> <li>• refuse, in full or in part, any contact made for the purpose of direct marketing and research</li> <li>• submit a complaint to supervisory authorities.</li> </ul> <p>If the processing of personal data has been based on a data subject's consent, the data subject has the right to withdraw their consent to having their personal data processed. Withdrawing this consent will not affect the processing of personal data carried out prior to the withdrawal.</p> <p>Any requests pertaining to checking or correcting data or the right to refuse contact must be submitted to the controller using the contact details provided in section 2 above.</p>