

## **PRIVACY STATEMENT OF JOHN NURMINEN FOUNDATION**

Following its entry into force on 25 May 2018 the provisions of the EU General Data Protection Regulation are applied to all organisations processing and holding personal data. The key aim of the new Regulation is to strengthen the rights and the conditions for consent of data subjects in relation to the processing of personal data. In this Privacy Statement issued by the John Nurminen Foundation (hereinafter also the Foundation), we describe in detail what personal data we collect and for what purposes personal data are used. The Privacy Statement also provides further information on the rights of data subjects.

Issued on 24 May 2018.

### **1. Controller**

John Nurminen Foundation  
Pasilankatu 2  
00240 Helsinki  
saatio(a)jnfoundation.fi

### **2. Contact person for the Privacy Statement**

Maija Salmiovirta  
Pasilankatu 2  
00240 Helsinki  
[rekisteri\(a\)jnfoundation.fi](mailto:rekisteri(a)jnfoundation.fi)  
+358 44 203 2213

### **3. Name of filing system**

Customer and supporter filing system of John Nurminen Foundation

### **4. For what purposes and on what legal grounds we can use your personal data**

We use personal data for the management and development of customer, donor and collaboration partner relationships and for the targeting of communications and marketing. Furthermore, we can process personal data in connection with diverse statistical purposes in which case personal data is, as a rule, pseudonymised in such a manner that the personal data can no longer be attributed to a specific data subject.

The collecting of personal data of data subjects is always limited to what is necessary in relation to the purposes for which they are processed.

#### **Management of customer relationships**

In connection with the management of customer relationships, the primary purpose of the processing of personal data is the performance of business transactions between the customer and the Foundation, e.g. when the customer purchases books or other products from the Foundation online store. Personal data can be processed e.g. for the purposes of invoicing, customer service,

delivery of purchases or collecting overdue invoices. The legal basis for the processing of personal data in accordance with the EU General Data Protection Regulation is the performance of contractual obligation.

### **Management of donor and collaboration partner relationships**

In connection with the management of donor and collaboration partner relationships, we process personal data e.g. for the purposes of publishing in the public donor register the information specified by the donor or of communicating with the collaboration partners on ongoing projects. The personal data of donors who have subscribed to the newsletter can also be used for the purpose of sending the newsletter. Apart from communication purposes, the personal data of collaboration partners can be used for the purpose of sending the newsletter provided that such a partner has not explicitly opted out of receiving the newsletter. The legal basis for the processing of personal data in accordance with the EU General Data Protection Regulation is the performance of contractual obligation.

### **Marketing**

We also use personal data for direct marketing and market targeting. The main channel used by the Foundation for direct marketing is the newsletter which provides information on the progress of the Foundation's projects and other current topics that we consider newsworthy for our customers and collaboration partners. The electronic newsletter, however, is sent only to such private persons that have explicitly subscribed to the newsletter e.g. through our website. Personal data may also be used for profiling e.g. in connection with customer analytics related to marketing. The legal basis for the processing of personal data in accordance with the EU General Data Protection Regulation is the legitimate interest pursued by the controller.

## **5. What data are recorded**

The following data are recorded in the filing system: the person's name, position, enterprise/organisation, postal address, email address, telephone number, inclusion in the newsletter distribution list, marketing prohibitions, donation records, customer history, commencement and termination date and cause of customer relationship and/or context in which personal data have been collected or obtained, and any other relevant information on donations or collaboration partner relationships.

## **6. How long data are retained**

We retain personal data only as long as necessary for the processing purposes specified in this Privacy Statement. The retention period may be longer due to the provisions of the Accounting Act or other statutory requirements binding upon us.

We can also retain data for a longer period for statistical purposes, for example. In these cases the data are kept in such a form that does not permit the identification of the data subject.

## **7. From what sources personal data are collected**

We collect personal data through the following means: messages submitted on online forms, via email, over the phone, through social media, on contracts and agreements, at customer meetings and in other contexts in which a customer, donor or collaboration partner willingly discloses personal data.

Furthermore, our newsletter management system features various beacons that allow checking certain online actions of newsletter recipients (e.g. opening the newsletter message, accessing any given newsletter content, the recipient's IP address and the timestamp of user action).

## **8. Regular destinations of disclosed data and transfer of data outside the EU or EEA**

We can transfer personal data to our own filing systems to be processed for the purposes specified in section 4.

Apart from our own filing systems, personal data are not disclosed or transferred to entities other than those contracted by the Foundation for the production, development or maintenance of services and communications, except in accordance with an agreement, separate explicit consent and/or specific statutory requirements. We can transfer personal data outside the EU or EEA in compliance with the conditions laid down in the provisions of the EU General Data Protection Regulation.

## **8. How your personal data are secured**

Protection of privacy is paramount for us, and we exercise great care in the processing operations of personal data contained in the filing system. We adhere to generally accepted standards of technology and operational security in order to prevent any unauthorised or unlawful processing or misuse and to protect personal data from loss, alteration or destruction.

The electronically processed data contained in the filing system are protected by means of firewalls, passwords and other technical means generally accepted in the information security industry. Manually maintained material is located in facilities to which unauthorised access is prevented. Access to the data contained in the filing system is granted only to designated employees of the Foundation or of an enterprise acting for or on behalf of the Foundation.

## **9. Your rights as a data subject**

In comparison to the provisions of the repealed Data Protection Directive, the rights of data subjects are specified in more detail in the EU General Data Protection Regulation. The Regulation also confers a number of new rights on data subjects. As a data subject, you have the following rights to your personal data held by the Foundation:

- a) Right of access to your personal data. You have the right to know whether we are processing your personal data and to review your personal data we may have collected, if any.
- b) Right to rectification of inaccurate or incomplete data. If the data are inaccurate, incomplete or imprecise, you have the right to request your personal data to be rectified, e.g. by means

of providing a supplementary statement.

- c) Right to erasure, i.e. right to be forgotten. You may request your personal data to be erased under the following conditions:
- The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed and there are no overriding legitimate grounds for the retention of your personal data.
  - You withdraw your consent on which the processing is based and there is no other legal ground for the processing.
  - You object to the processing and there are no overriding legitimate grounds for the processing.
  - The personal data have been unlawfully processed.
  - The personal data of a minor have been collected in relation to the offer of information society services directly to a child.
- d) Right to restriction of processing. You have the right to obtain from the controller restriction of processing if you contest the accuracy of the personal data or the lawfulness of processing, or you have objected to processing.

You have the right to object to processing on the grounds of your legitimate interests or fundamental rights and freedoms. You have the right at any time to object to the processing of your personal data for the purposes of direct marketing or profiling associated with direct marketing.

- e) Right to data portability. If the processing of personal data is based on consent or on a contract and the processing is carried out only by automated means, you have the right to receive the personal data in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller.

If you choose to exercise any of the data subject rights referred to above, every request submitted by a data subject is considered on a case-by-case basis. Please note that in certain cases the retention and processing of personal data may be necessary for the purposes of statutory compliance, resolution of disputes or performance of contractual obligations.

The request for exercising data subject rights must be submitted in writing to the contact person for the Privacy Statement (Section 2 of this Privacy Statement). Where necessary, we may ask you to specify the request in more detail and to provide additional information necessary to confirm your identity before further consideration of the request. We will inform you of action taken on the request without undue delay and in any event within the time limit set in the EU General Data Protection Regulation (i.e. usually within one month).

### **Communication and contact with the Foundation or the supervisory authority**

If you have any queries about the Privacy Statement, do not hesitate to contact via email ([rekisteri\(a\)jnfoundation.fi](mailto:rekisteri(a)jnfoundation.fi)) or by post (Pasilankatu 2, 00240 Helsinki) our contact person for the Privacy Statement.

You also have the right to lodge a complaint with the competent supervisory authority, should you consider that we have processed your personal data in violation of any of the applicable statutory

data protection requirements. In Finland, the competent supervisory authority is the Office of the Data Protection Ombudsman ([www.tietosuoja.fi](http://www.tietosuoja.fi)).

## **10. Changing the Privacy Statement**

We continuously strive to develop our services and privacy policies, and, therefore, reserve the right to change this Privacy Statement by placing a notification of change on this page. The Privacy Statement can also be updated in order to reflect changes in legislation. We recommend that you revisit this Privacy Statement on a regular basis.