



## **PRIVACY STATEMENT FOR THE JOHN NURMINEN FOUNDATION COMPETITIONS AND RAFFLES PARTICIPANT REGISTER**

This Privacy Statement (“**Privacy Statement**”) of the John Nurminen Foundation sr (hereinafter “**JNF**” or “**us**”) concerning the participant register of competitions and raffles was drawn up on 6 April 2020. In this Privacy Statement, we describe how the John Nurminen Foundation collects and processes your personal data if you have participated in a competition or raffle organised by us, or if your personal data are processed in connection with them. In this Privacy Statement, you can also find more information on your rights in relation to processing your personal data.

JNF respects your privacy, and is committed to managing your personal data appropriately as required by this Privacy Statement, the European Union’s (“**EU**”) General Data Protection Regulation (2016/679), and other applicable law (jointly “**Data Protection Legislation**”).

### **1. Controller**

John Nurminen Foundation sr  
Pasilankatu 2  
FI-00240 Helsinki  
info(a)jnffoundation.fi

### **2. Contact person and data protection officer in charge of the Privacy Statement**

Anni Kujala  
Pasilankatu 2  
FI-00240 Helsinki  
rekisteri(a)jnffoundation.fi  
+358 50 467 6740

### **3. Name of the register**

John Nurminen Foundation competitions and raffles participation register

### **4. Purpose and legal grounds for using your personal data**

As a part of our operations, we organise various competitions and raffles on our website and via our communications channels, such as social media, and in the premises of our partners. The **purpose** of using your personal data is:

- organising marketing raffles and competitions
- choosing raffle and competition winners, and giving prizes to them
- informing the winners
- other communications related to marketing raffles and competitions
- using the contents you may have delivered to us, or content involving you that has been delivered to us, on JNF's own website or in other communications channels (including social media), and implementing related rights and obligations.
- planning and developing our products and services

The basis for processing your personal data is JNF’s *legitimate interest* to implement in practice the marketing raffle and/or competition in which you have participated, as well as other related

communications and activities when you have participated in a competition or raffle organised by us, or given us the permission to use the contents you have provided in exhibitions, on our website, or in our other communications channels (including social media). If we have received your personal data from a third party who participates in a marketing raffle and/or competition organised by us, and delivers us content which is related to you, the basis for processing your personal data is JNF's legitimate interest to implement marketing raffles and/or competitions as well as related communications and other activities (such as publishing the content in exhibitions, on our website, in other communications channels including social media, and implementing related rights and obligations) when content related to you has been delivered to JNF.

Moreover, we can process your personal data for direct marketing purposes and for targeted marketing. Our direct marketing comprises essentially of our newsletter, which contains information on the progress of the John Nurminen Foundation's projects, as well as on other current issues which we believe to be of interest to you.

Your personal data will be processed for direct marketing purposes only *with your consent*.

In connection with the content you have delivered to us we will also process, *with your consent*, your personal data in order to include them in the [Finnish Literature Society \("SKS"\)](#) archives.

## **5. What kind of personal data do we collect, and from what sources?**

In our competition and raffle participant register, we collect e.g. the following personal data:

- first name and last name
- age/year of birth
- domicile
- contact information (such as postal address, telephone number, and e-mail address for contacting you)
- any other information that is relevant for the competition or the raffle, such as e.g. a photograph and information on the photographer, delivered to us by the raffle or competition participant

Moreover, information on the optional consent or refusal to be sent direct marketing materials will be stored in the competition and raffle participant register. The information entered to the competition and raffle participant register will be collected, in adherence with guidelines, from you yourself as you participate in the competition or the raffle. In as far as information or other content related to you is delivered to us in connection with competitions and raffles, we will first and foremost gather the data from the persons who participate in the competitions and raffles, or, whenever possible, from you yourself.

## **6. Is your personal data handed over or transferred to third parties?**

As a rule, we hand your personal data over only when it is necessary in order to implement the purposes described above. JNF can hand over your personal data to third parties who produce, develop, or maintain services and communications for JNF, or to other partners for the personal data use purposes described in this Privacy Statement. For example, we are currently using an outside service provider, Harha XR Oy Ab, to create exhibitions. Moreover, personal data can be handed over to IT or other similar subcontractors, who will process personal data solely as defined in the contract drawn up with JNF, and for the purpose of providing services for JNF. JNF is responsible for drawing up such contracts with third parties, in accordance with Data Protection Legislation, for the purpose of processing personal data. Your personal data can also be handed over to e.g. the authorities in cases where this is required by law.

Moreover, with your consent, we transfer your personal data to the SKS archives, where your personal data is processed for the purposes of non-profit archiving, in line with their [privacy statement](#). As a rule, your

personal data is not handed over to third parties without your approval. However, your personal data can be handed over to third parties without your consent in e.g. situations where legislation or regulatory provisions so require.

JNF or its service providers may use companies from outside the EU or the European Economic Area ("EEA") for personal data processing or service implementation. Personal data will be transferred outside the EU or the EEA only when an appropriate transfer basis exists, and in line with the requirements of Data Protection Legislation.

#### **7. How will your personal data be processed and protected?**

JNF processes your personal data only for the purposes described above, for the implementation of which the data has originally been collected. Protecting your personal data is important to us, and in processing your personal data, we comply with good data management practices and the duty to care and protect, as set down in Data Protection Legislation. We have at our disposal up-to-date technical and organisational procedures which ensure the appropriate safekeeping of personal data against e.g. unauthorised and unlawful processing, and protect the data from loss, destruction, or damage caused by such activities. We protect the electronically handled data in the register with e.g. firewalls, passwords, and other generally used and accepted technical methods of the data security industry. Manually maintained information is stored in premises that cannot be accessed by unauthorised persons. Only our designated staff members and employees from companies that work for us have access to the personal data in the register, within the scope required by their tasks.

#### **8. How long will your personal data be retained?**

In our operations, we comply with the retention periods specified by law, and will keep your personal data in our competition and raffle participant register only for the duration and with the scope necessary for the purpose for which they are processed.

Personal data in the competition and raffle participant register will only be retained for the time they are needed for the selection of competition or raffle winners, notifying the winners, and the delivery of prizes (if any), and for any procedures involving the use of the materials you may have delivered to us in connection with the competition. We will delete your personal data immediately after the abovementioned procedures with the exception of Instagram, where publications are based on hashtag use and where the contents, to which Instagram's data protection policies apply, belong to the users.

#### **9. What are your rights as a data subject?**

As a data subject, you have the following rights pertaining to your personal data in the competition and raffle participant register:

- **Right to access and check your data:** You have the right to receive a confirmation from us on whether your personal data will be processed or whether they will not be processed; if your personal data are processed, you have the right of access to all your personal data in the JNF competition and raffle participant register, and the right to check your personal information.
- **Right to correct, remove, and limit the processing of your data:** You have the right to require us to correct without undue delay any erroneous, unnecessary, incomplete or expired personal data. You have the right to request us to remove any personal data pertaining to you if the said personal data is no longer required for the purposes for which they were originally filed, or for which they have been processed, or if you suspect your personal data is processed in an illegal manner, or if the personal data needs to be removed in order to comply with a requirement of the law (that applies to the controller). You also have the right to request that your data is processed in a limited

manner. Please note that the removal of your personal data or a limitation on their processing may lead to us being unable to access your personal data in a way that would make it possible for you to take part in the competition or raffle for which your personal data was collected.

- **Right to object to the processing of your data:** You have the right to object to the processing of your personal data on the basis of personal special circumstances if the data is being processed because of JNF's legitimate interest. Situations where JNF can demonstrate that there is a very important and well-grounded reason for processing the data, surpassing the rights of the data subject, are an exception, as are cases when processing is needed in order to draw up, present, or defend an appeal at court. Please note that objecting to the processing of your personal data may lead to us being unable to access your personal data in a way that would make it possible for you to take part in the competition or raffle for which your personal data was collected.
- **Right to transfer data from one system to another:** You have the right to transfer the personal data delivered to JNF to another controller. This right of transfer applies automatically to processed personal data which have been processed in line with your consent, or in line with an agreement to which you are party. JNF will deliver the data to you in an itemized, commonly used and machine-readable format and also deliver the data to the other controller, if this is technically possible.
- **Right to revoke consent:** In situations where your personal data are processed on the basis of your consent, you have the right to revoke your consent at any time by contacting us.

Should you wish to exercise the rights described above, wish to be provided more information about the processing of your personal data, or have comments about their processing, you can contact us at any time at rekisteri(a)jnffoundation.fi.

#### **10. Right to lodge a complaint with supervisory authorities**

JNF aims to always settle any disputes concerning your personal data directly with you. If, in your opinion, JNF has not handled your personal data in line with applicable Data Protection Legislation, you have the right to lodge a complaint with the competent supervisory authorities. Contact information of the supervisory authority:

Office of the Data Protection Ombudsman  
PO Box 800  
00531 HELSINKI, FINLAND  
street address: Lintulahdenkuja 4, 00530 Helsinki  
email: tietosuoja@om.fi  
switchboard: 029 56 66700  
[www.tietosuoja.fi](http://www.tietosuoja.fi).

#### **11. Changes in the Privacy Statement**

We seek to continuously develop our services and our practices pertaining to privacy; we therefore reserve the right to alter this Privacy Statement by announcing the changes on this page. The changes may also be based on changes in legislation. We recommend that you go through the contents of this Privacy Statement regularly.