

## **PRIVACY POLICY FOR THE JOHN NURMINEN FOUNDATION AND BALTIC SEA SERVICES OY'S CUSTOMER AND SUPPORTER REGISTER**

This privacy policy (hereinafter the "**Privacy Policy**") for the John Nurminen Foundation and its subsidiary Baltic Sea Services Oy's ("**JNS**" or "**we**") customer and supporter register was created on 24 May 2018 and updated on 30 November 2021.

In this Privacy Policy, we provide a detailed description of how JNS collects and processes the personal data of contact persons for our customers, donors and other supporters (such as pro bono partners), and of employees working with our partners' stakeholder engagement, sponsorship and sustainability issues. You can also find more information about your rights with regard to the processing of your personal data.

JNS respects your privacy and is committed to processing your personal data in an appropriate manner in compliance with both this Privacy Policy and the European Union's ("**EU**") General Data Protection Regulation (2016/679) and other applicable legislation (together "**Data Protection Legislation**").

### **1. Controller**

The John Nurminen Foundation is the controller of any data processing described in this policy that is not related to book sales:

John Nurminen Foundation  
Pasilankatu 2  
00240 Helsinki, Finland  
[info@jnffoundation.fi](mailto:info@jnffoundation.fi)

Baltic Sea Services Oy, a subsidiary of the John Nurminen Foundation, is the controller of customer data processing relating to book sales:

Baltic Sea Services Oy  
Pasilankatu 2  
00240 Helsinki, Finland  
[kauppa@jnffoundation.fi](mailto:kauppa@jnffoundation.fi)

### **2. Contact person for the privacy policy and person responsible for data protection**

Anni Kujala  
Pasilankatu 2  
00240 Helsinki  
[rekisteri@jnffoundation.fi](mailto:rekisteri@jnffoundation.fi)  
+358 50 467 6740

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

John Nurminen Foundation and Baltic Sea Services Oy customer and supporter register

### **4. The purpose of and legal basis for processing your personal data**

We process personal data for the purposes described below, such as managing and developing customer, donor or supporter relations, and for targeting our communications and marketing to both private persons

and communities and their contact persons. We collect only the personal data that is necessary in relation to the purposes for which it is being processed.

The **purpose** of processing your personal data is:

- Carrying out and managing an agreement, for example, when you order books from JNS's webstore
- Delivering books and other products
- Invoicing and debt collection
- Customer service
- Managing monthly and other donations, and fulfilling accounting obligations
- Publishing the information you wish to appear in the donor register
- Sending information about JNS's ongoing projects
- Sending supporter reports and other communications about the use of donation funds
- Organising events
- Developing our activities and customer experience
- Collecting feedback
- Sending information to collection organisers about the total amount collected and the donors who participated in commemorative and anniversary collections.

The legal basis for processing personal data for customer relations management, managing donor and supporter relations and keeping in contact with partners, is either JNS's legitimate interest, the data subject's consent or to enable JNS to implement agreements. JNS does not make any automated decisions that would have legal implications.

We may also process your personal data for direct marketing purposes and to target marketing. Our direct marketing mainly covers our newsletter, which is sent either by email or post, and contains information about progress on JNS's projects and other current topics that we believe will be of interest to you. However, the Foundation's newsletter is only sent to those people who have subscribed for it, for example, through our website. In addition to the newsletter, we may – with your consent – send you digital direct marketing about JNS's events, fundraising campaigns, book offers or other content of interest. On the basis of our legitimate interest, we may also use your personal data to market things such as our fundraising campaigns, products or activities by telephone or post, or to send you email marketing about products or services based on your previous customer relationship. Based on our legitimate interest, your personal data may also be used for profiling, for example, in connection with customer marketing analytics.

At any time, you have the right to object to the processing of your personal data for the purposes of direct marketing or profiling for direct marketing.

We also use cookies and other similar technologies on our website and in our newsletters, to ensure the functionality of our website, to develop and improve our user experience, and to target relevant marketing. You can read more about the cookies we use, their purpose and retention periods in our [Cookie Policy](#).

## **5. What personal data do we collect and from where?**

We collect the following personal data in our customer and supporter register:

- person's name
- position and company/organisation
- contact details (such as address, email address and telephone number)
- school and grade in connection with our Taksvärkki collection

- information about subscription to the newsletter mailing list
- information about consent to/prohibition of direct marketing
- donation information and information required to process bequests
- customer history, notes about the customer relationship and notes about meetings
- the start and end time of the customer relationship and/or other contact, and the contact method
- invoicing details and payments
- any other information necessary for organising and developing events, such as dietary requirements and restrictions
- any other information necessary for accepting donations, customer account management and partnerships.

As a rule, we mainly collect data for the customer and supporter register from you yourself, for example, when you give us information via online forms or social media services, by email or telephone, in agreements, via event registrations and payment information, and at customer meetings or other events at which you disclose your information. We may also collect personal data from public sources.

In addition, we collect personal information using cookies and other similar technologies on our website and in our newsletters.

## **6. Will your personal data be disclosed or transferred to third parties?**

We only transfer your personal data when it is necessary to carry out one of the aforementioned purposes.

JNS may transfer your personal data to parties involved in the provision, maintenance and development of JNS's services and communications, or to its other partners, and these parties may process your personal data for the purposes described in this Privacy Policy. Your data may also be transferred to other subcontractors and service providers that are responsible for IT, software and other similar services. JNS will enter into the necessary contractual arrangements with third parties to ensure that your personal data is processed in accordance with Data Protection Legislation.

In principle, your personal data will not be disclosed to third parties without your consent. However, your personal data may be disclosed to third parties without your consent in some situations, such as situations in which its disclosure is required by law or official regulations. If you make a donation to a commemorative or anniversary collection, we will send your name to the collection organiser.

Please note that third parties may process the information collected via cookies and social media plugins on our website..

JNS or its service providers may use companies located outside the EU or European Economic Area ("EEA") to process personal data or provide services. Personal data will only be transferred out of the EU or EEA when there are justified grounds for doing so and in compliance with Data Protection Legislation.

## **7. Joint controllers**

When JNS administers pages on Facebook and Instagram, JNS and Facebook Ireland Ltd ("**Facebook**") are the joint controllers of JNS's Facebook and Instagram pages, as applicable. Your personal data will be used for purposes such as keeping you informed about JNS's work/events and how donations have been used; running competitions and prize draws; marketing and collecting feedback; purchasing and measuring the performance of Facebook advertisements; and better targeting communications. The legal basis for processing your personal data is JNS's legitimate interest. Data used in competitions will be processed in accordance with a separate privacy policy that will be issued for each competition.

JNS collects data through its Facebook and Instagram pages in the form of, for example, likes and other reactions, comments, visits, post visibility, and personal data submitted in connection with competitions. The information that JNS receives from Facebook is the person's user name, public profile picture, and any other data that has been marked as public. Data subjects may provide other personal data in comments on social media pages or via messaging services. This information will not be combined with other data held in personal data registers without informing the data subject or without the data subject's consent.

Where applicable, we are also joint controllers with Facebook with respect to the cookies used in Facebook's social media plugins and certain services relating to Facebook's advertising networks. You can read more about cookies and social media plugins in our [Cookie Policy](#).

In Facebook's [privacy policy](#), you can read how and on what legal basis Facebook processes your data, and how you can exercise your rights under data protection legislation. We have signed a joint controller agreement with Facebook that describes JNS's and Facebook's responsibilities with respect to the data we collect. Please note that if you wish to exercise your rights under data protection legislation with respect to data processed by Facebook, you should contact Facebook.

You can restrict the processing of your personal data by unliking and/or unfollowing a page. You can also request a conversation to be deleted from a messaging service. You can also choose not to accept non-essential cookies when you visit our website, or withdraw your previously given consent.

## **8. How is your personal data processed and protected?**

JNS processes your personal data only for the aforementioned purposes and only for the purposes for which the data was originally collected. The protection of your personal data is important to us, and we comply with both good data management practices and the due diligence and obligations laid down in Data Protection Legislation. We adhere to generally accepted technical and organisational measures to prevent any unauthorised or unlawful processing or misuse of personal data, and to protect personal data from loss, alteration or deletion. The electronically processed personal data contained in the register is protected by means of firewalls, passwords and other technical means that are generally used and accepted in the information security industry. Workstations and IT systems are protected using personal usernames and passwords. Our workstations also utilise two-factor authentication.. Manually maintained material is located in facilities to which unauthorised access is prevented. Access to the personal data contained in the register is granted only to designated employees of the Foundation or of an enterprise acting for or on behalf of the Foundation, and only to the extent that is required to carry out the task at hand. Our employees have signed a non-disclosure agreement.

## **9. For how long will your personal data be retained?**

We comply with statutory retention periods, and will retain your personal data only for as long as is necessary, and to the extent that is required, to carry out the purposes for which the personal data is being processed as defined in this Privacy Policy (for example, for the duration of a contractual term).

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

As a data subject, you have the following rights with regard to your personal data in the customer and supporter register:

- **The right to access and verify your data:** You have the right to receive confirmation from us about whether or not your personal data is being processed; and if your personal data is being processed, you have the right to access and verify all of the personal data being held about you in the customer and supporter register.

- **The right to correct, delete and restrict the processing of your data:** You have the right to require us to correct any inaccurate, unnecessary, incomplete or outdated personal data without undue delay. You have the right to request us to delete any of your personal data that is no longer required for the purpose for which it was originally collected or processed, or if you suspect that your personal data is being processed illegally, or if your personal data must be deleted to comply with a legal obligation (that applies to the controller). You also have the right to request a restriction on the processing of your data. Please note that deleting or restricting the use of your personal data may, for instance, result in a deterioration in your customer service experience, that you can no longer be a monthly donor, or that you no longer receive our newsletters or information on our project progress.
- **The right to object to the processing of your data:** When the basis for processing personal data is JNS's legitimate interest, you have the right to object to the processing of your personal data with respect to a specific personal situation. The exception to this is when JNS can demonstrate that there is a very important and justified reason that overrides the data subject's interests, or if processing is necessary for the preparation, presentation or defence of a legal claim. However, you always have the right to object to the processing of your personal data for direct marketing purposes (including profiling) without any justification. Please note that objecting to the processing of your personal data may, for instance, result in a deterioration in your customer service experience, that you can no longer be a monthly donor, or that you no longer receive our newsletters or information on our project progress.
- **The right to transfer data from one system to another:** You have the right to transfer the personal data you supplied to JNS to another controller. This transfer right covers automatically processed personal data whose processing is based on your consent or an agreement to which you are a party. JNS will send the data in a machine-readable and commonly used format to you, and will also send the data directly to the other controller if this is technically possible.
- **The right to withdraw consent:** If your personal data is being processed on the basis of your consent, you may withdraw your consent to such processing at any time by contacting us.

If you would like to exercise any of the rights described above, would like to receive more information about the processing of your personal data, or have any comments on its processing, you can contact us at any time by sending an email to [rekisteri\(a\)jnfoundation.fi](mailto:rekisteri(a)jnfoundation.fi).

## 11. Lodging a complaint with the supervisory authority

JNS always aims to resolve any disputes regarding the processing of your personal data directly with you. If you believe that JNS has not processed your personal data in accordance with applicable Data Protection Legislation, you have the right to lodge a complaint with the competent supervisory authority. The contact details for the supervisory authority are:

Office of the Data Protection Ombudsman  
P.O. Box 800  
00531 HELSINKI  
Visiting address: Lintulahdenkuja 4, 00530 Helsinki  
email: [tietosuoja@om.fi](mailto:tietosuoja@om.fi)

telephone exchange: +358 (0)29 56 66700

[www.tietosuoja.fi](http://www.tietosuoja.fi).

## **12. Amendments to the Privacy Policy**

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