

PRIVACY POLICY FOR THE JOHN NURMINEN FOUNDATION'S STAKEHOLDER REGISTER

This privacy policy (hereinafter the “**Privacy Policy**”) for the John Nurminen Foundation’s (“**JNS**” or “**we**”) stakeholder register was created on 29 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 representatives of our various stakeholders. 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

John Nurminen Foundation
Pasilankatu 2
00240 Helsinki, Finland
info@jnsfoundation.fi

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

Anni Kujala
Pasilankatu 2
00240 Helsinki
rekisteri@jnsfoundation.fi
+358 50 467 6740

3. Name of the register

John Nurminen Foundation stakeholder register

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

We process personal data in order to manage and develop communications and collaborative partnerships with, for example, the contact persons for our project partners, government ministries, authorities and service providers, media representatives, Baltic Sea Action Day partners, as well as members of steering groups appointed to our projects. In order to acquire new partners for sustainability projects, JNS may also reach out to employees of potential partner companies whose responsibilities include stakeholder engagement, sponsorship, or sustainability issues. 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:

- Sending information about JNS’s ongoing projects
- Keeping you informed about JNS’s activities
- Sending out press releases and media invitations
- Convening steering group meetings
- Sending invitations to JNS’s events and meetings
- Managing other collaborator and stakeholder relations
- Managing Baltic Sea Action Day events, activities and other contacts
- Contacting new and potential partners and partner companies.

The legal basis for processing stakeholders' personal data is JNS's legitimate interest and to enable JNS to implement agreements. JNS does not make any automated decisions that would have legal implications.

We may also process data about employees of our stakeholder organisations for direct marketing purposes. 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 our stakeholders and their employees. The Foundation's newsletter is only sent to those people who have subscribed to it. Consent is the basis for processing personal data in this context. You have the right to prohibit the processing of your personal data for direct marketing purposes at any time.

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 stakeholder register:

- person's name
- position and company/organisation
- contact details (such as address, email address and telephone number)
- information about consent to/prohibition of direct marketing
- information about subscription to the newsletter mailing list
- the start and end time of the contact, and the contact method
- notes about the stakeholder relationship and notes about meetings
- any other necessary information relating to cooperation
- any other information necessary for organising and developing events, such as dietary requirements and restrictions.

As a rule, we mainly collect data for the stakeholder register from you yourself, for example, when you give us information via online forms or social media services, by email or telephone, in agreements, or during meetings and other events at which stakeholders disclose information. We may also collect personal data from public sources and, for non-commercial purposes, from third parties on the basis of, for instance, recommendations.

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 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 necessary, we may also provide funding organisations, such as the European Union, with lists of event participants, so that the funders can confirm that a project's objectives have been realised and fulfil their legal obligations.

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.

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 stakeholder 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 stakeholder 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 you no longer receiving our newsletters or invitations to our events.
- **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 without any justification. Please note that an objection to the processing of your personal data may, for instance, result in you no longer receiving our newsletters or invitations to our events.
- **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)jnffoundation.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
telephone exchange: +358 (0)29 56 66700
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.