

Privacy Notice

20 October 2020

1. Data controller

Business Finland Oy (Business ID: 2725690-3)
Visiting address: Porkkalankatu 1, 00180 Helsinki, Finland
Switchboard: +358 (0)29 50 55000

2. Point of contact

Please e-mail: dataprotection@businessfinland.fi

3. Name of register

Santa's Sustainable Competition

4. Purpose of personal data processing and basis for processing

Category of data subjects	Data utilised for	Basis for processing
Persons involved in participating to the Santa's Sustainable Competition	<ul style="list-style-type: none">- the launch and execution of the competition called Santa's Sustainable Competition- communication with the representatives of the participating schools/classes/families	Contract data controller's legitimate interest

Processing tasks may be outsourced to third party service providers in accordance with the data protection legislation and the boundaries imposed by same.

5. Data content of register

We aim to process only the following personal data in relation to the competition:

- Name and country of the representatives of the competing team (i.e. school, class or family)
- E-mail address of the representative of the competing team
- Relevant e-mail address or telephone number for the winning team for the purposes of Santa's call

We may process personal data also if the submitted entry includes data where individuals can be recognized, such as images or videos.

It is up to the winning team to provide the names of the members for the purposes of Santa's call, as they see appropriate, and subject to the consents, as required by the law.

6. Personal data retention period

The personal data is kept as long as the submitted materials are retained. The submitted entries are retained maximum of three years.

The erasing shall take place by means of deleting the information in its entirety, by rendering the data passive so that the data are no longer processed and access to the data is restricted, by means of encrypting or overwriting.

7. Regular sources of information

Information shall be collected from the representatives of the participating teams.

8. Regular disclosures of information and recipient categories

The competition is arranged in co-operation with the co-operation partners Rovaniemen Matkailu ja Markkinointi Oy/Visit Rovaniemi, Haaga-Helia University of Applied Sciences and the Finnish Innovation Fund Sitra, and personal data may be disclosed to them in order to execute the competition.

Information may be disclosed within the framework of the Act on Innovaatorahoituskeskus Business Finland and Business Finland Oy (1146/2017) to Innovaatorahoituskeskus Business Finland.

9. Transfer of data outside of the EU or EEA

Personal data may be transferred outside of the European Union or the European Economic Area in accordance with the data protection legislation and within the boundaries imposed by same. If no decision regarding an adequate level of data protection has been issued in relation to the target country, the transfer shall occur by means of employing the standard clauses approved by the European Commission.

The data controller may transfer personal data outside of the EU and the European Economic Area in accordance with the data protection legislation and within the boundaries imposed by same to the employees working in the data controller's own overseas network, to the data controller's subsidiaries and subcontractors and to its service providers retained for data processing.

10. Principles for protecting the register

Manual material

Any material to be retained on paper is stored in locked facilities equipped with access control. The data controller's personnel have undertaken confidentiality obligations.

Data to be processed electronically

Personnel access to the electronic data content of the register has been protected with personal user IDs and passwords. Utilisation of some of the data content of the register has been restricted to a limited group of users. The environment has been protected with appropriate firewalls and other technical safeguards.

The purpose of the above-mentioned measures is to secure the confidentiality, availability and integrity of the personal data to be stored in the register, as well as the implementation of data subjects' rights.

11. Automated decision-making

The information in the register shall not be utilised for decision-making entailing legal effects for the person and that is based on automated data processing, such as profiling.

12. Data subject's right to object to the processing of personal data

The data subject shall have the right, in connection with their personal specific circumstances, to object to profiling pertaining to themselves and to other processing measures directed by the data controller at the data subject's personal data to the extent the data processing is based upon the data processor's legitimate interests.

The data subject may present their claim regarding the objection in accordance with section 15 of this privacy policy. In conjunction with the claim, the data subject must specify the specific circumstances based on which they are objecting to the processing. The data controller may refuse to carry out the request pertaining to the objection on the grounds stipulated for under the legislation.

13. Data subject's right to object to direct marketing

The data subject may issue the Data Controller consents or prohibitions pertaining to direct marketing on a channel-specific basis, including profiling taking place for direct marketing purposes. However, the personal data is not meant to be used for direct marketing.

14. Other data subject's rights pertaining to the processing of personal data

Data subject's right to obtain access to the information (Right of Access)

The data subject shall have the right to inspect which data concerning them has been stored in the register. The inspection request must be submitted in accordance with the instructions set forth in this privacy policy. The right of access may be denied upon grounds stipulated in the law. As a point of departure, exercising one's right of access in an ordinary manner is free of charge.

Data subject's right to require the rectification or erasure of data or restriction of processing

To the extent the data subject is able to act for themselves, the data subject shall, without any undue delay, after becoming aware of the error, or, having detected the error themselves, rectify, erase or supplement any piece of information found in the register being contrary to the purpose of the register, erroneous, unnecessary, deficient or outdated.

To the extent, the data subject is not able to rectify the information themselves, the correction request shall be submitted in accordance with section 15 of this privacy policy.

The data subject shall also have the right to require the data controller to restrict the processing of their personal data, for instance in circumstances where the data subject is awaiting the data controller's response to their request regarding the correction or erasure of their personal data.

Data subject's right to lodge a complaint with the supervisory authority

The data subject shall have the right to lodge a complaint with the competent supervisory authority, if the data controller has not complied with the applicable data protection regulation in its operations.

15. Contacts

In all questions concerning the processing of personal data and situations related to the exercise of the data subject's rights, the data subject should contact the data controller. The data subject may exercise their rights by contacting dataprotection@businessfinland.fi

16. Versions

This privacy policy is updated on October 20, 2020.

The data controller follows the developments in legislation and will develop its operations constantly, and consequently, retains the right to update this privacy policy.
