



BUSINESS REGISTER PRIVACY POLICY

Under the General Data Protection Regulation (GDPR), the controller has the obligation to provide clear information to the data subjects. This policy meets the obligation to provide information.

1. CONTROLLER

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2. DATA SUBJECTS

The filing system consists of customers, potential customers, stakeholders and co-operation partners.

3. BASIS FOR MAINTAINING THE FILING SYSTEM AND PURPOSE OF USE

Basis for maintaining the filing system

Personal data are processed for implementing the agreement between the controller and the data subject and, as applicable, based on the consent given by the data subject, in connection with or to enable the management of orders, registrations, interactions, transactions, marketing, reporting and other measures related to the management of existing and potential customer relationships, stakeholder relations or partnerships.

Purpose of personal data processing and the filing system

The personal data, purchase and transaction data and location data processed in the filing system can also be used for profiling and for targeting customer communications according to the data subject's areas of interest. Additionally, personal data can be used for managing or developing customer or stakeholder relations, enabling orders, registrations, interactions, transactions, marketing,



reporting and other measures related to the management of the customer relationship. The purpose of the processing is to maintain the contact details and other contacts, communications and marketing. Furthermore, the purpose of the processing is to carry out payments, fees and compensation or to carry out collection and surveys, statistics and research.

The legal basis for the processing is the implementation of the agreement and the implementation of a legitimate interest related to business, such as direct marketing and sales and customer service for non-customers.

The processing of personal data can also be based on consent given for one or several purposes.

The processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party, except where such interests are overridden by interests or fundamental rights which require protection of personal data.

4. PERSONAL DATA SAVED IN THE FILING SYSTEM

Filing system's data contents: basic information, company's or organisation's contact person's first and last name, position, contact details (phone number, email address, address), previous work history, start and end date of contact person's position, website addresses, web connection's IP addresses, social media credentials, information on ordered services, invoicing addresses and other information related to the customer relationship and the ordered services, information on participation in events, information on sending and opening releases and invitations, contents of the held discussions, areas of interest and mailing prohibitions.

The event registration data entered by the data subject can include, among other things, the following information: email, phone number, address, date of birth and areas of interest.

5. FILING SYSTEM PROTECTION PRINCIPLES

The data are stored technically protected. Physical access to the data has been prevented by access control and other security measures. Access to the data requires sufficient rights and authentication. Unauthorised access is prevented through, among other things, firewalls and technical protection. The data can only be accessed by the specifically designated representatives of the controller and the service provider companies that we use. Material that is maintained manually is located in locked spaces which can only be accessed by the designated persons. Only the designated persons have the right to process and maintain the data in the filing system. The users are bound by an obligation of confidentiality. The filing system data are backed up securely and they can be restored if required.



6. RIGHTS OF THE DATA SUBJECTS

- Right of access to the personal data that has been collected from the data subject. The data subject must request his or her data in writing and the controller shall provide information on the collected data within a month.
- Right to request the rectification of the data in writing.
- Right to request the erasure of the data. The controller has the obligation to erase the data if one of the following criteria is met:
 - * the personal data are no longer needed for the purposes for which they were collected
 - * the data subject cancels his or her consent
 - * the data subject objects to the processing and there is no basis for the processing or the data subject objects to the direct marketing purpose
 - * the personal data have been processed unlawfully
 - * the personal data must be erased to fulfil a legal obligation
 - * the personal data has been collected in connection with the provision of information society services
- Right to request the restriction of processing
- Right to data portability from one system to another
- To the extent where the processing of personal data is based on the data subject's consent, the data subject has the right to cancel his or her consent at any time without this affecting the legality of the processing that took place on the basis of the consent before the consent was cancelled
- Right to lodge a complaint with the Data Protection Ombudsman: Contact information of the Data Protection Ombudsman:
www.tietosuoja.fi/fi/index/yhteystiedot.html

7. REGULAR SOURCES OF DATA

Data provided by customers, potential customers, stakeholders and co-operation partners, customer data system, invoice database and other situations in which members of the aforementioned groups disclose their data.

In addition, personal data are collected from authorities, public registers and personal data directories, media and other information sources, such as internet search engines or through social media services.

8. REGULAR DISCLOSURE OF DATA

At the controller's discretion, the data can be disclosed within the limits permitted and required by the legislation in force at any given time to our co-operation partners, unless the data subject has prohibited the disclosure of the data. Data shall be disclosed to co-operation partners only for purposes that support the idea of the filing system.

In addition, data contained in the filing system are transferred to the specified personal data processor based on the service agreement. Such activities can include, for example, technical management of personal data, analysis, communications and campaigns, collection of outstanding receivables or direct marketing. Appropriate data protection attachments have been added to the agreements concluded with the personal data processors and the controller ensures that the processor protects the personal data in compliance with the GDPR.



9. DURATION OF PROCESSING

- Personal data are stored as long as the basis for processing mentioned in the privacy policy is valid and for a reasonable period thereafter, considering binding legislation, such as accounting legislation. The data are processed at minimum as long as the customer relationship, potential customer relationship or other similar relationship is in force.
- The data subject can unsubscribe from our marketing list through the link provided in each marketing email message sent by us.

10. PERSONAL DATA PROCESSORS

The personal data are processed by the controller and its employees. We can also outsource the processing of personal data in part to a third party, in which case an agreement is concluded to ensure that personal data are processed in accordance with the valid data protection legislation and otherwise in an appropriate manner.

11. TRANSFER OF DATA OUTSIDE THE EU

As a general rule, the controller does not transfer data outside the EU or the EEA; instead, it endeavors to use service providers operating within the EU, but if data is transferred outside the EU or the EEA, the controller shall ensure that a legal basis exists for the data transfer and that the personal data are protected using the standard agreements approved by authorities and appropriate technical means of protection.

12. AUTOMATIC DECISION-MAKING AND PROFILING

We do not use the data for automatic decision-making or profiling.

The privacy policy has been published on the website.