

DESCRIPTION OF THE PERSONAL DATA FILE OF FINNLINES GROUP CONCERNING CONTACTS REQUESTS

1 CONTROLLER

The controller of the personal data file is Finnlines Plc.

The contact person in matters related to this personal data file is:

Data Protection Officer: Elisa Satuli.

Finnlines Plc

Address: Komentosilta 1, FI-00980 Helsinki, Finland

Telephone: +358 10 34350

E-mail: dataprivacyofficer@finnlines.com

2 NAME OF THE PERSONAL DATA FILE

The name of the personal data file is the Data File of Contact Requests.

3 PURPOSES OF THE PROCESSING OF THE PERSONAL DATA

The personal data is processed for purposes of responding contact requests from the customers and other related proceedings. Contacts requests are sent through Finnlines website.

For these purposes the personal data is processed in matters such as a customer participating a contest, cargo offer request or to handle a feedback from a customer or other matters that are related to implementing, administering and developing Finnlines' group services as well as to answering and managing of customer- and interest group relations.

Processing of the personal data and directing the communications to the data subject is based on the data subject's own declaration of his/her willingness to receive communication or requested a right to access the personal data, a rectification of inaccurate personal data or requested to erasure the personal data concerning him or her by the Controller.

The data subject has a right to cancel his/her consent and to prohibit the communications directed to him/her.

The controller is processing the personal data by itself and by using data processors that are processing the personal data on behalf of the controller.

4 LEGAL BASIS FOR THE PROCESSING OF THE PERSONAL DATA

The legal basis for the processing of personal data according to the EU General Data Protection Regulation are the following:

- (a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;

- (b) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party;
- (c) processing is necessary for compliance with a legal obligation to which the controller is subject;
- (d) processing is necessary for the establishment, exercise or defense of legal claims

The above mentioned legitimate interest pursued by the controller is based on a relevant and appropriate relationship between the data subject and the controller, which is a result of the data subject visiting the controller's websites and leaving there a contact- or subscription request, or otherwise expresses to the controller that he/she wants to receive the communications for the aforementioned purposes, and the personal data of the data subject is processed for purposes that the data subject could have reasonably expected to take place at the time and in the context of the collection of the personal data.

5 CONTENT OF THE PERSONAL DATA FILE AND CATEGORIES OF PERSONAL DATA CONCERNED

The personal data file contains personal data of data the following data subjects:

- data subject who has filed a request concerning access to personal data, a rectification of inaccurate personal data or erasure of the personal data concerning him or her; and
- data subject who has filed another type of a contact request.

The personal data file contains the following personal data of data subject who have filed contact request:

- a) first name and surname of the data subject (of data subject);
- b) contact detail e.g. address, e-mail address, phone number (of data subject);
- c) IP-address (of data subject);
- d) time when the data subject has filed a contact request
- e) serial number of the contact request filed
- f) in addition the file contains the following information of the data subject who has filed a request concerning access to personal data, a rectification of inaccurate personal data or erasure the personal data concerning him or her or other request: other information needed for identification of the request, e.g. notification from the data subject concerning the time when the request is filed or Controllers service area;
- g) information about when and what the data subject has been answered on basis of his or her request
- h) information about the documentation transferred for the data subject

In addition, the personal data file contains the following personal data of data subject who has filed an other type of a contact request:

- i) consents or prohibitions (of data subject) related to direct marketing.

Providing of the above described personal data to the controller is a requirement necessary so that the controller is able to send communications to the data subject. If the data subject does not give this personal data to the controller, then the controller may not be able to provide to the data subject the communications that he/she has requested.

6 REGULAR SOURCES OF THE PERSONAL DATA

Personal data is collected from the data subject.

7 STORAGE PERIOD OF THE PERSONAL DATA

Personal data will be stored only as long as and only to the extent that is necessary in relation to the initial and compatible purposes of processing.

Personal data will be stored in accordance with the following time periods or criteria used to determine that time period:

- basic information and contact information about the data subject: first name, surname, email address will be stored 18 months;
- the IP-address of the data subject and other technical information will be stored: 18 months; and
- the information provided by the data subject in connection with the request for access to personal data, a rectification of inaccurate personal data or to erasure of the personal data reply addressed to the data subject will be retained three years after the request has been processed.

The controller evaluates the need to store personal data once per six months; and in all cases the personal data of a data subject will be deleted from the personal data file three years after any responsibilities and liabilities of the controller related to the contact request have been concluded.

The controller evaluates the need to store personal data regularly according to the code of conduct. The controller performs all possible reasonable measures to ensure that any inaccurate, incorrect or outdated personal data will be deleted or corrected without delay.

8 THE RECIPIENTS OR CATEGORIES OF RECIPIENTS OF THE PERSONAL DATA AND THE REGULAR DISCLOSURES OF PERSONAL DATA

The controller does not disclose personal data to any recipients.

9 TRANSFER OF THE PERSONAL DATA OUTSIDE THE EU OR THE EEA

The personal data in the personal data file is not transferred outside the EU or the EEA.

10 DESCRIPTION OF THE SECURITY PRINCIPLES OF THE PERSONAL DATA FILE

Any materials and documents containing personal data are kept in locked rooms and spaces, to which access is limited to only named and authorized personnel.

Any databases containing personal data are on servers that are kept in locked rooms and spaces, to which access is limited to only authorized personnel. The servers are protected with appropriate firewalls and other technical protection measures.

Any databases and ICT systems require access by personal user logins and passwords. The controller has restricted the user logins and passwords to only necessary persons with need to legally process and access such data. In addition, the access and use of data is recorded in the log of the ICT system.

The employees and other authorized persons of the controller are bound to follow the obligation of confidentiality and to keep confidential any information related to the processing of personal data.

11 RIGHTS OF THE DATA SUBJECT

The data subject has the following rights, in accordance with the EU General Data Protection Regulation:

- (a) the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information: (i) the purposes of the processing; (ii) the categories of personal data concerned; (iii) the recipients or categories of recipient to whom the personal data have been or will be disclosed; (iv) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; (v) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing; (vi) the right to lodge a complaint with a supervisory authority; (vii) where the personal data are not collected from the data subject, any available information as to their source. This basic information (i)–(vii) is given by this document;
- (b) the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal;
- (c) the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Considering the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement
- (d) the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies: (i) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; (ii) the data subject withdraws consent on which the processing is based and where there is no other legal ground for the processing; (iii) the data subject objects to the processing on grounds relating to his or her particular situation and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing of personal data concerning him or her for direct marketing purposes; (iv) the personal data have been unlawfully processed; (v) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- (e) the right to obtain from the controller restriction of processing where one of the following applies: (i) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data; (ii) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead; (iii) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; (iv) the data subject has objected to processing on grounds relating to his or her particular situation pending

the verification whether the legitimate grounds of the controller override those of the data subject;

- (f) the right to obtain from the controller restriction of processing where one of the following applies: (i) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data; (ii) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead; (iii) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; (iv) the data subject has objected to processing on grounds relating to his or her particular situation pending the verification whether the legitimate grounds of the controller override those of the data subject;
- (g) the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where the processing is based on consent pursuant or on a contract and the processing is carried out by automated means;
- (h) the right to lodge a complaint with a supervisory authority if the data subject considers that the processing of personal data relating to him or her infringes the EU General Data Protection Regulation.

The data subject should contact the contract person mentioned above in section 1, in any matters related to the rights of the data subject.