

DESCRIPTION OF PERSONAL DATA FILE OF STAR CLUB LOYALTY PROGRAM

1 WHO IS THE CONTROLLER OF THIS PERSONAL DATA FILE AND WHO CAN I CONTACT

The controller is Finnlines Plc.

Street address: Komentosilta 1, FI-00980 Helsinki, Finland.

P.O.Box 197, FI-00181 Helsinki.

The contact person is Päivi Toivanen. You are free to contact her by e-mail paivi.toivanen@finnlines.com or by telephone +358 50 565 6242.

The Data Protection Officer (DPO) of Finnlines is Elisa Satuli. You may contact her by e-mail dataprivacyofficer@finnlines.com or by telephone: +358 10 34350. During her absence, Ella Parviainen acts as the DPO.

This document provides the information that is set out to be provided to the data subject (i.e. the person whose personal data is being processed) in accordance with the EU General Data Protection Regulation (GDPR). We provide the information both where processed personal data is collected from the data subject and where personal data has been obtained from other sources. In addition, in this description we are providing information about your rights as a data subject. In case you wish to get more specific information, e.g. a description of detailed storage periods of data, feel free to contact us by e-mail paivi.toivanen@finnlines.com.

2 WHAT DOES FINNLINES NEED YOUR PERSONAL DATA FOR

Depending on the service, your personal data is processed for the following purposes:

- Planning, implementing, monitoring, administering, managing and developing the loyalty program,
- Giving discounts and benefits to the data subject in accordance with the terms of the loyalty program,
- Directing marketing and communications to the data subject, such as targeting and giving notifications, Star Club Newsletters, marketing and advertising to the data subject, and also processing personal data for the purposes of direct marketing and electronic direct marketing,
- Using personal data for the purposes of profiling to target marketing to the data subject.

3 WHY FINNLINES HAS THE RIGHT TO PROCESS YOUR PERSONAL DATA

The legal basis for the processing of personal data is set out in the GDPR and in the national legislation. Finnlines is authorized to process your personal data when:

- (a) You have given **a consent** for the processing of your personal data for one or more specific purposes,

- (b) Processing is necessary for the **performance of a contract** to which you are party or in order to take steps at your request prior to entering into a contract, and when
- (c) Processing is necessary for the purposes of the **legitimate interests** pursued by Finnlines.

The “legitimate interest” means that there is a customer relationship between Finnlines and you. In this context Finnlines only processes your personal data to purposes, which you as the customer of Finnlines may reasonably expect.

4 THE INFORMATION WE COLLECT

Finnlines collects the following personal data of all members of Star Club:

- Name, phone number and e-mail address,
- Street address, post code, town, country,
- Nationality and language,
- Gender and date of birth and
- Star Club ID and interests.

Finnlines also collects some **technical data** during the registration on the website of Finnlines. This technical data includes IP address, the time of saving information in the digital system and the number of the subscription in the digital subscription system.

The above described personal data is necessary for the purposes of managing the Star Club customer relationship. In case you do not give this personal data to Finnlines, we may not be able to make a contract with you and we may not be able to provide our services to you.

We also collect information about the **bookings of the data subject** (such as the booking channel, the booking date, the date of departure, the route of the ship, the type of the vehicle) and **information about the co-passengers** (age, nationality and gender). This information is connected to the above mentioned information about the data subject

Furthermore, we store **consents and prohibitions** related to sending electronic marketing messages to you.

5 WHERE DO WE REGULARLY COLLECT YOUR PERSONAL DATA FROM

Finnlines collects your personal data directly from you by using electronic Star Club registration form. This information is connected to the information about your bookings, which is also collected from you during the booking of the trip.

6 FOR HOW LONG DO WE STORE YOUR PERSONAL DATA

Personal data will be stored only as long as and only to the extent that it is necessary for Finnlines to comply with its responsibilities.

Your basic information and contact information, booking information and consents or prohibitions related to direct marketing will be stored 6 months and technical data will be stored for one year.

Finnlines erases any possible special categories or personal data (such as health related data) from the data file immediately when there no longer is a reason for its processing.

7 WHO WILL HAVE A LEGAL BASIS TO RECEIVE PERSONAL DATA FROM FINNLINES

Finnlines uses the services of other companies, i.e. data processors, in the processing of your personal data. A typical example are companies offering IT solutions to Finnlines. The duties of these processors towards Finnlines are specified in the data processing agreements between Finnlines and the data processors and the companies are not allowed to use your personal data to any other purposes.

Finnlines does not disclose your personal data to any recipients. Furthermore, no personal data is transferred outside the EU or the EEA.

8 SECURITY PRINCIPLES OF THE PERSONAL DATA FILE

Any personal data of the Star Club loyalty program members can only be accessed and viewed by those Finnlines employees whose work assignments include the maintenance of the Data File of Finnlines Star Club Loyalty Program and managing customer relationships and communications. The processing of personal data requires authentication and login to a protected computer software, and each access to the computer software leaves log information to the profile of the customer.

Finnlines tries to process any personal data of the Star Club loyalty program members only electronically, so that you may update by separate digital form your personal data in the data file. Statistical data may be only accessed and processed by such persons that are responsible for customer communications.

The employees and other authorized persons of Finnlines are bound to follow the obligation of confidentiality and to keep confidential any information related to the processing of personal data. According to this, the databases and ICT systems require access by personal user logins and passwords. In addition, the access and use of data is recorded in the log of the ICT system. Finnlines has restricted the user logins and passwords to only necessary persons with need to legally process and access such data.

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

9 YOUR RIGHTS

Your rights, in accordance with the GDPR, are as follows:

Right of access your personal data

You have the right to know, which personal data we process about you, to receive information about how we process the data, and to receive a copy of this data.

Right to erasure your personal data (“right to be forgotten”)

In situations set out in the GDPR, you have the right to have your personal data to be deleted from Finnlines’ systems. This may be possible, for example, when we have checked that we no longer need your personal data to comply with our legal obligations. In all cases your personal data will be deleted according to Finnlines’ storage schedule.

Right to have wrong information about you corrected (“rectification”)

Finnlines has a privacy policy according to which we process personal data about our customers in general. However, in case you find any incorrect information about you, you always have the right to ask us to correct it without undue delay.

Right to restrict the processing of your personal data

In certain circumstances, you have the right to ask Finnlines to restrict the processing of your personal data. In such case Finnlines will only store the data, but Finnlines will not process it by any other way but storing it. This right is applicable for example when you do not want to have the data to be erased, but you want to request the restriction of use instead.

Right to data portability

In certain circumstances specified in the GDPR, you have a right to receive your own personal data that you have provided to Finnlines, in a structured, commonly used and machine-readable format. You also have a right to ask Finnlines to transmit the aforementioned data directly to another service provider (“controller”) that you may want to use. Please note, that this right only applies to situations specified in the GDPR where your data is processed in automated means.

The right to lodge a complaint

You have the right to lodge a complaint with a supervisory authority (Office of the Data Protection Ombudsman) in case you feel that your rights as a data subject have been infringed. More information may be found at <https://tietosuoja.fi/en>

Right to object

You have the right to object processing your personal data in cases when the processing is not based in law, but when we carry out processing for our legitimate business interests. You also have the right to cancel the consent for direct marketing purposes or other consent at any time. Please note that the withdrawal of your consent will not affect the lawfulness of processing your personal data before the withdrawal.