

## **DESCRIPTION OF THE PERSONAL DATA FILE OF FINNLINES STAR CLUB LOYALTY PROGRAM**

### **1 CONTROLLER**

The controller of the personal data file is Finnlines Plc.

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

Dagmar Vetter, Data Protection Officer; or Elisa Satuli

Finnlines Plc

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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 Finnlines Star Club Loyalty Program.

### **3 PURPOSES OF THE PROCESSING OF THE PERSONAL DATA**

The 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.

The data subject has a right to object profiling and to prohibit the direct marketing.

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 performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;

- (c) processing is necessary for the purposes of the legitimate interests pursued by the controller;

The above mentioned legitimate interest pursued by the controller is based on the relevant and appropriate relationship between the controller and the data subject that is a result of the data subject being a customer and registered member of the loyalty program of the controller and using the services provided by the controller, 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 the following personal data of all data subjects:

- First name, surname
- Phone number
- E-mail address
- Address, post code, town, country
- Nationality
- Language
- Gender
- Date of birth
- Star Club ID
- Interests of the data subject
- Technical data that is collected during the registration on the website of the controller: IP address the time of saving information in the digital system and the number of the subscription in the digital subscription system

Provision of the above described personal data to the controller is a requirement necessary so that the controller is able to register the data subject in the loyalty program. If the data subject does not give this personal data to the controller, then the controller may not be able to provide the services to the data subject.

In addition, the personal data file contains the following personal data related to the booking of the data subject, which is then connected to the above mentioned information about the data subject: 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.

Furthermore, the personal data file contains consents or prohibitions related to sending electronic marketing messages to the data subject.

## **6 REGULAR SOURCES OF THE PERSONAL DATA**

Personal data is collected from the data subject by using electronic Star Club registration form. This information is connected to the information about the bookings of the data subject, [which is also collected from the data subject during the booking of the trip].

## **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 will be stored 6 months;
- Any information about the bookings of the data subject will be stored 6 months;
- Any consents or prohibitions related to direct marketing will be stored 6 months;
- Technical data will be stored for one year.

In addition, 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//TO A THIRD COUNTRY OR INTERNATIONAL ORGANISATION**

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**

### **A. Manual register**

Any personal data and interests of the Star Club loyalty program members can only be accessed and viewed by a small group of Finnlines employees whose work assignments include the maintenance of the Data File of Finnlines Star Club Loyalty Program and managing customer relationships. 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.

### **B. Data register/ADP register**

The controller tries to process any personal data and interests of the Star Club loyalty program members only electronically, so that each data subject may update by separate digital form his/her personal data in the data file. Unspecified statistical data may be only accessed and processed by such persons that are responsible for customer communications.

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. Taking into account 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 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;
- (g) the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement 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 any matters related to the rights of the data subject.