

SKIPPERI'S PRIVACY NOTICE

With this Privacy Notice we provide you information on how and why we process your personal data in our business activities.

We process personal data in our business activities for the following purposes:

- Customer relationships
- Strong identification of customers
- Strategic analysis of customer data to develop services and fulfil customer needs
- Email marketing
- Postal marketing
- Business partner relationships
- Recruiting
- Communications
- Social media
- Cookies
- Legal obligations

The controller of your personal data is Harmaja 10 Oy (Business ID: 2789909-5), which is located at Veneentekijätie 6, 00210 Helsinki, Finland.

If you have any questions regarding the privacy notice, please contact our data protection officer at dpo@skipperi.fi.

1) WHAT TERMS ARE USED IN THIS PRIVACY NOTICE?

Controller means the party responsible for processing the personal data of the data subject.

Customer means the party who rents the boat, the party who is offering the boat for rental as well as the city boater.

Data subject is a term for a human being in accordance with data protection laws.

Legal basis for processing means the legal ground on which the controller processes the data subject's personal data. The lawfulness of processing is described in Article 6 of the GDPR.

Personal data means any information concerning the data subject or information by which the data subject can be identified.

Privacy notice means a document drawn up in accordance with Articles 13 and 14 of the EU General Data Protection Regulation (hereinafter "**GDPR**"), through which the controller informs data subjects of the ways their personal data is processed.

Processor means the party who processes personal data on behalf of the controller.

Purpose for processing means the reason why the controller processes the data subject's personal data.

2) WHY DO WE PROCESS YOUR PERSONAL DATA?

We process your personal data in accordance with the processing purposes listed below. In the sections on processing purposes, you will find information on what personal data we process and on what legal basis we process your personal data.

Customer relationships

We process our customers' personal data for customer relationship purposes, namely for performing the rental service and city boat service. For these purposes we process our customers' contact details, date of birth data, pictures, bank account data, boating skill data and boat data.

The legal basis for processing is the performance of our contractual obligations.

Strong identification of customers

We process our customers' personal ID's for the purposes of strong identification of customers.

We have a basis to process personal ID data based on our contractual obligations and Section 29 Subsection 2 of the Finnish Data Protection Law (1050/2018), as our services are rental services.

Strategic analysis of customer data to develop services and fulfil customer needs

We process our customers' personal data to strategically analyse it to develop new services and fulfil customer needs. For these purposes we process our customers' contact details, as well as information related to the use of our services.

The legal basis for processing is our legitimate interests, according to which we develop our services.

NB! You may have a right to object data processing for these purposes (see section concerning your rights).

Email marketing

We process personal data of our customers for email direct marketing purposes. For these purposes we process our customers' contact details and information related to the use of our services.

The legal basis for processing is our legitimate interests, as marketing is provided to our customers.

NB! You have a right to object data processing for these purposes (see section concerning your rights).

Postal marketing

We process personal data of boat owners included in public registers for postal direct marketing purposes. For these purposes we process the data subjects' contact details.

The legal basis for processing is our legitimate interests, according to which we sell our services.

NB! You have a right to object data processing for these purposes (see section concerning your rights).

Business partner relationships

We process the personal data of our business partners for the purposes of business partner relationships. For these purposes we process the business partners' contact details.

The legal basis for processing is the performance of our contractual obligations.

Recruiting

We process the personal data of job applicants for recruiting purposes. For these purposes we process the job applicants' contact details, CV information and other data disclosed to us.

The legal basis for processing is our legitimate interests, according to which we govern our recruiting practices.

NB! You have a right to object data processing for these purposes (see section concerning your rights).

Communications

We process the personal data of people who contact us for communication purposes. For these purposes we process contact details and other data disclosed to us.

The legal basis for processing is our legitimate interests, according to which we govern our communication.

NB! You may have a right to object data processing for these purposes (see section concerning your rights).

Social media

We process the personal data of our social media contacts for social media purposes. For these purposes we process contact details.

The legal basis for processing is our legitimate interests, according to which we manage the contact requests made to us.

Cookies

We process IP address data of the people who visit our website for purposes concerning the use of cookies. Please see our Cookie Notice for more information.

The legal basis for processing is consent given in accordance with the Finnish Act on Electronic Communications Services (917/2014).

Legal obligations

We process our customers' contact details in order to be able to comply with the Finnish Accounting Act (1336/1997).

3) FROM WHERE DO WE COLLECT YOUR PERSONAL DATA?

We collect your personal data from different sources, depending on our purposes for processing personal data.

Customer relationships / Strong identification of customers / Email marketing

We collect your personal data for these purposes from yourself.

Postal marketing

We collect your personal data for this purpose from different public registers, such as Traficom's information systems.

Business partner relationships / Communications

We collect your personal data for these purposes from yourself, our business partners, the authorities, and different public sources, such as the trade register.

Strategic analysis of customer data to develop services and fulfil customer needs / Recruiting / Legal obligations

We collect your personal data for these purposes only from yourself.

Cookies

We collect your personal data by using cookies.

4) DO WE TRANSFER YOU PERSONAL DATA?

We may transfer personal data to third parties as a normal course of our business. When personal data is transferred to third parties, we ensure that the transfers are carried out in a secure way and in accordance with adequate data protection agreements.

We may also transfer personal data to third countries. When doing so, we ensure an adequate level of data protection, e.g. by using standard contractual clauses issued by the European Commission, and other similar arrangements.

All personal data may be transferred to data storage and communications service providers. Personal data processed for the purposes of Strong identification of our customers may be transferred to service providers who provide strong authentication services, and personal data processed for the purposes of our Legal obligations may also be transferred to accounting and auditing service providers.

5) HOW LONG DO WE RETAIN YOU PERSONAL DATA?

The retention period of your personal data depends on the purposes for which we process your personal data. We inspect the necessity of the retained personal data regularly and keep records of the inspections.

Customer relationships / Strong identification of customers / Business partner relationships

We retain personal data for as long as our contractual relationship is in effect.

Strategic analysis of customer data to develop services and fulfil customer needs

We retain necessary personal data for as long as it is necessary to fulfil the purpose of data processing.

Email marketing / Postal marketing

We retain personal data for as long as it is relevant or until you prohibit us (i.e. opt out) from processing your personal data for direct marketing purposes, or when we find out that you no longer wish to receive marketing.

Recruiting

We retain the necessary personal data for a maximum of twelve (12) months from the receipt day of the job application.

Communications

We retain the necessary personal data for three (3) years after the contact.

Social media

We retain information on our social media channels until individuals remove their information from the channels.

Cookies

The retention period depends on each cookie used.

Legal obligations

We retain data for as long as the law requires us to retain data.

6) WHAT DATA PROTECTION RIGHTS DO YOU HAVE?

You may be entitled to use the below listed data protection rights. The contacts concerning the rights shall be submitted to the controller's contact person in writing. Your rights can be put into action only after you have been satisfactorily identified.

You may also have a right to lodge a complaint to the supervisory authority, if you think that the processing of your personal data infringes the data protection laws.

Right to inspect

The data subject has a right to inspect what data the controller has stored of him/her.

Right to rectify and erasure

The data subject has a right to request the controller to rectify or erase the personal data concerning the data subject on the grounds provided by law.

Right to restriction of processing

The data subject can request the controller to restrict the processing of personal data concerning the data subject on the grounds provided by law.

Right to data portability

The data subject shall have a right to receive the personal data concerning him/her, which he/she has provided to the controller, in a structured, commonly used and machine-readable format, if the processing is based on consent or an agreement between the controller and the data subject and the processing is performed automatically.

Right to object

If personal data is processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him/her for such marketing.

If personal data is processed on the basis of the legitimate interests of the controller, the data subject shall have the right to object the processing of personal data concerning him/her for such purposes in accordance with the law.

Right to object to automated individual decision-making, including profiling

The data subject shall have a right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him/her or similarly significantly affects him/her.

Right to withdraw consent

If the legal basis for the processing of personal data is consent given by the data subject, he/she shall have the right to withdraw his/her consent.

7) CAN THIS PRIVACY NOTICE BE AMENDED?

We may unilaterally amend this privacy notice. We update the privacy notice as necessary, for example, when there is a change in legislation. Amendments to this privacy notice will take effect immediately when we post an updated version on our website.

If we make significant changes to the privacy notice, or if there is a significant change in the way it is used, we will notify the data subjects.

(Last update 25.1.2021)