

23.8.2021

PRIVACY POLICY – NOORMARKKU WORKS

This privacy policy describes how we process the personal data of the visitors of Noormarkku Works and of those who subscribe our newsletter.

1 CONTROLLER

Controller	A. Ahlström Kiinteistöt Oy (hereafter "Ahlström Kiinteistöt" or "we")
Business ID	2566575-4
Address	Laviantie 22, 29600 Noormarkku
Phone Number	+358 50 5183677

2 LEGAL BASIS AND PURPOSE OF PROCESSING

We process your personal data for the implementation of hotel and restaurant services. We process your data in these situations to fulfil the contract we have with you as the customer of our hotel and restaurant services and to fulfil our statutory obligations. We process your personal data for these purposes e.g. in the following situation:

- measures related to making reservations;
- to communicate to you about your upcoming reservation and informing you about possible changes;
- measures related to invoicing;
- measures related to purchases of our products and services from our web shop; and
- to maintain a passenger name record.

We also process your personal data on the basis of our legitimate interest, for example, to improve our services and to market our services. These situations may include us sending you customer surveys or information about our services.

We also process your personal data to send you our newsletter and electronic direct marketing if you have given us your consent to do so.

Your personal data is not being used for automated decision-making that would have legal or similar effects on your rights.

3 PERSONAL DATA COLLECTED

The personal data we process of you may include:

- visitor data for the passenger declaration form such as your name, address, social security number, nationality, date of birth, country of arrival, passport number, date of arrival and date of departure;
- contact details such as e-mail address and telephone number;
- information about subscriptions to our newsletter and consents to electronic direct marketing;
- information about dietary restrictions and allergies;
- invoicing and payment details such as credit card details;
- age range for discount purposes for children and retired persons; and
- camera surveillance information as we have camera surveillance on our general premises for security reasons.

4 RETENTION PERIODS OF PERSONAL DATA

We store your data as long as it is necessary to perform the service you have requested and approximately three (3) years thereafter.

We retain your consent to receive electronic direct marketing and information related to your newsletter subscription until you withdraw your consent or unsubscribe to our newsletter.

Camera surveillance footage is stored for 3 months.

We may however retain certain personal data longer in situations required by law. Below are examples of such time limits:

- passenger declaration information: one year after the signing of the passenger declaration form (the Accommodation and Catering Services); and
- accounting materials: 10 or 6 years from the end of the financial period (the Accounting Act).

5 HOW DATA IS COLLECTED

We obtain your personal data from you when you make a booking for our hotel or restaurant services, make a purchase at web shop, or subscribe to our newsletter. In addition, when a customer attends to a fair, data transfers to us via the event organiser.

6 DISCLOSE OR TRANSFER OF DATA

Processing tasks may be outsourced to external service providers and providers of security services in accordance with and within the limits set by data protection legislation. Main operators to whom processing tasks have been outsourced include providers of payment and marketing services.

We may disclose your personal data to authorities when required to do so by law, such as passenger declaration information to the police authorities when it is necessary for the performance of official duties.

7 TRANSFER OF DATA OUTSIDE THE EU/EEA

In general, personal data is not transferred outside the European Union or the European Economic Area.

However, due to technical implementation of the data processing, a limited amount of the information may be physically located on servers or hardware of third-party subcontractors. Personal data is not transferred outside of the EU or the EEA, unless it is necessary for reasons pertaining to the technical implementation of the service. To provide sufficient safeguards on data protection for the data to be transferred outside of the EU or the EEA we use standard contractual clauses provided by the European Commission.

8 SECURITY MEASURES

The electronic material is stored in systems which are protected by usernames and passwords and other various technical protections. The purpose of these actions is to ensure the confidentiality of personal data, the availability and integrity of the data and the exercise of the rights of data subjects.

9 RIGHTS OF THE DATA SUBJECT

As a data subject, you have certain rights under the General Data Protection Regulation 2016/679 (GDPR). Below are short descriptions of these rights.

Right to access: Data subjects have the right to receive confirmation from the controller on whether the controller is processing personal data that concerns them. The controller must provide the data subject with a copy of the personal data being processed. As a rule, the exercise of rights is free of charge.

Right to rectification: Data subjects have the right to demand the rectification of inaccurate personal data concerning them and to have incomplete personal data completed.

Right to erasure: In certain cases, specified in Article 17 of the GDPR, the data subject has the right to have the controller erase data concerning them. For example, when the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed.

Right to restriction of processing: In certain cases, specified in Article 18 of the GDPR, the data subject can request the controller to restrict the processing of personal data concerning them. The right to restriction exists, for example, when the data subject contests the accuracy of the personal data. In such cases, the processing will be restricted for a period enabling the controller to verify the accuracy of the personal data.

Right to object: In certain situations, the data subject has the right to object to the processing of their personal data, that is, request the controller not to process it at all. If the data is processed for the performance of a task carried out for the purposes of the compelling legitimate interests pursued by the controller or a third party, the data subject has the right to object to the processing on grounds relating to their particular situation. In such cases, the processing must be stopped unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the data subject.

If the personal data is processed for direct marketing based on legitimate interest, the data subject has the right to object at any time

to the processing without any specific grounds, after which the data may no longer be processed for purposes of direct marketing (this includes profiling related to direct marketing).

Right to data portability: The data subject has the right to receive the personal data that they have provided to a controller in a structured, commonly used, and machine-readable format and, if desired, transmit that data to another controller.

Right to withdraw consent: If personal data is processed based on consent, the data subject has the right to withdraw consent by informing the controller. Withdrawal of consent does not affect the lawfulness of the processing carried out prior to the withdrawal of consent.

Right to lodge a complaint with the supervisory authority: The data subject has the right to lodge a complaint with the competent supervisory authority if the data subject considers that the controller has not complied with the applicable data protection regulation.

10

CONTACT INFORMATION AND THE USE OF DATA SUBJECT RIGHTS

In all matters relating to the processing of personal data and in situations involving the exercise of rights, the data subject should contact the controller's representative Riitta Kilo, ruukit@ahlstrom.fi, +358 50 518 3677.