

## Privacy Statement – Training register

1	The Finnish Red Cross (FRC)
– Register controller	Tehtaankatu 1 A
	00140 Helsinki, Finland
	Phone: +358 20 701 2000
2	The Finnish Red Cross / Data protection
Contact information	Tehtaankatu 1 A
for matters	00140 Helsinki, Finland
pertaining to the	Phone: +358 20 701 2000
handling of personal	tietosuoja@redcross.fi
information	
3	
Personal data group	Finnish Red Cross / Training register
4 The purpose of processing personal data	<ul> <li>Personal data is processed in order to carry out Red Cross training with the organisation's volunteers, trainers, members and other participants and operators. The processing is justified by the controller's legitimate interests, i.e. to maintain a training register in order to safeguard the organisation's operations. Processing the necessary personal data is vital for carrying out the organisation's operations.</li> <li>The same data processing grounds apply to all Red Cross training that is organised by its headquarters, districts and branches.</li> <li>The personal data in the training register is used for the following purposes: <ul> <li>Maintenance, monitoring, analysis, statistics, development, profiling and segmentation connected to the processing of training participant data and other appropriate contexts.</li> <li>Managing the training information and contact history of training participants, managing service measures and ensuring quality.</li> <li>Managing the training information of the training participants and ensuring operational quality.</li> <li>Processing the training information of the training participants in connection with managing and carrying out events, training sessions, services and payments, including analysing, developing, personalising and reporting on them.</li> <li>Monitoring, analysing, developing and forming statistics on training provided by the Red Cross.</li> </ul></li></ul>



	<ul> <li>Training-related marketing and distance selling, such as direct marketing, digital marketing, product marketing, requests for donations and invitations to events.</li> <li>Market surveys and opinion polls, as well as training-related surveys and studies.</li> <li>Recordings of phone calls with customers are used to verify service events, ensure the legal protection of customers and the Red Cross, improve the quality of the service and prevent misuse, as well as for training purposes and security reasons.</li> <li>Personal data may be processed by third parties for purposes permitted by applicable legislation, including marketing, distance selling, market surveys and opinion polls. These third parties may be advertising agencies, printing houses or similar partners that promote the register's operating principle and whose purpose for using the personal data is consistent with that of the Red Cross. The Red Cross has signed the necessary agreements with these third parties for the processing of</li> </ul>
	personal data.
	The personal data of individuals who have participated in training will be kept for five years after completion of their training. Data pertaining to qualifications will be kept for three years after the expiry of the qualifications.
5	The following data on training participants may be processed:
The register's data	
content	identification data
	o name
	o gender
	<ul> <li>date of birth</li> </ul>
	<ul> <li>contact details:</li> </ul>
	<ul> <li>home address</li> </ul>
	<ul> <li>telephone number</li> </ul>
	<ul> <li>email address</li> </ul>
	<ul> <li>user language</li> </ul>
	<ul> <li>first language</li> </ul>
	<ul> <li>customer number</li> </ul>
	<ul> <li>personal identity code</li> </ul>
	<ul> <li>photographs taken during volunteer activities</li> </ul>
	training-related information
	<ul> <li>start, end, statuses and levels of training participation</li> </ul>
	<ul> <li>validity of any training qualifications</li> <li>data from profiling and on interasts</li> </ul>
	<ul> <li>data from profiling and on interests</li> <li>participation in activities</li> </ul>
	<ul> <li>participation in training</li> <li>campaign and contact information</li> </ul>



	data concerning the use of services
	<ul> <li>permission and consent</li> </ul>
	<ul> <li>bans on direct marketing and surveys</li> </ul>
	<ul> <li>identifiers used for targeted marketing</li> </ul>
	$\circ$ the training participant's grouping data and other information
	accumulated through analytics
	<ul> <li>cookie data</li> </ul>
	<ul> <li>log data</li> </ul>
	<ul> <li>session identifiers</li> </ul>
	<ul> <li>IP addresses</li> </ul>
	<ul> <li>payment and transaction data</li> </ul>
	<ul> <li>recordings of customer phone calls</li> </ul>
	<ul> <li>customer feedback.</li> </ul>
	The Red Cross only stores data that is necessary for the organisation's operations and data processing purposes that have a legal basis. Any data no longer necessary for its original purpose, as well as any outdated data and data that no longer has any other grounds for being processed, will be anonymised or disposed of in a secure manner.
6	Data on training will be collected in the register via various channels during
Regulatory data sources	participation in Red Cross training.
	Personal data is received and updated according to regulations
	• from participants
	<ul> <li>via the online service</li> </ul>
	<ul> <li>during customer service interactions</li> </ul>
	<ul> <li>with a reply card</li> </ul>
	o via email
	<ul> <li>during the use of products and services</li> </ul>
	<ul> <li>when a volunteer takes part in voluntary work, product and service</li> </ul>
	development, studies or surveys
	<ul> <li>by a Red Cross branch, district, institution or headquarters</li> </ul>
	<ul> <li>via the Population Information System's personal data updating service</li> </ul>
	<ul> <li>from the registers of telephone companies and other similar public</li> </ul>
	enterprises
	<ul> <li>via Sivis Study Centre's education management system.</li> </ul>
	Cookies
	The Red Cross website uses cookies. The organisation's cookie policy can be viewed on its website at <u>https://www.redcross.fi/cookie-policy/</u> .
7	Personal data in the training register will be disclosed according to regulations
, Regular disclosures of data	between the Red Cross branches, districts, institutions and headquarters.
	Training data is disclosed to parties funding training, when necessary.



	The Finnish Red Cross's training register is partly managed through Sivis Study Centre's education management system, 'Sivis network', and participant data collected outside the network's registration system can be disclosed to the network as well.
	Students participating in online training can see each other's names and email addresses.
	Data can be disclosed to public authorities in aid assignments based on agreements and the Red Cross's status as a preparedness organisation supporting the authorities.
	On a case-by-case basis, a data subject's personal data may be disclosed to partners participating in the implementation of Red Cross events and marketing, for example to provide accommodation and catering services or form target groups within the marketing partners' services. Data may be disclosed for marketing surveys and opinion polls.
8	No data is transferred outside of the EU or EEA.
Transfer of data	
outside the EU or EEA	
9	Personal data processed in physical form:
The principles of	Material that is processed in its physical form is stored and handled in monitored
securing the register	facilities.
	Digital material:
	The data is processed within databases that are secured with firewalls, passwords
	and other technical means. The data on the websites and other services is secured
	with an SSL-encrypted connection and other necessary means. Databases and their
	backup copies are located in locked rooms, and the data may only be accessed by
	specific individuals, named in advance.
	Systems containing personal data may only be used by employees and volunteers
	whose work role gives them the right to process personal data. Each user has their
	own user ID and password to the system.
	The volunteers responsible for the processing in each branch process the
	volunteers' personal data in accordance with this privacy statement and the Red
	Cross guidelines.
10	Data subjects have the right to:
The rights of a data	<ul> <li>Request a copy of their personal data.</li> </ul>
subject	<ul> <li>Request that their personal data be amended or deleted, unless applicable</li> </ul>
	data security regulations require that the data be retained.
	<ul> <li>Request restrictions on the processing of their personal data or oppose this</li> </ul>
	processing.
	<ul> <li>Request the right to transfer their data from one system to another, in</li> </ul>
	accordance with applicable data security legislation.



<ul> <li>Refuse, in full or in part, any contact made for the purpose of direct marketing and research.</li> </ul>
<ul> <li>Submit a complaint to the data security authorities.</li> </ul>
If the processing of personal data has been based on a data subject's consent, the data subject has the right to withdraw their consent to having their personal data processed. Withdrawing this consent will not affect the processing of personal data carried out prior to the withdrawal.
Any requests pertaining to checking or correcting data or the right to refuse contact must primarily be made in writing and sent to the email address provided in Section 2. If contact by email is not possible, the data subject may send a letter, contact the customer service department or personally visit a Red Cross office. The Red Cross will send its reply to the data subject's email address listed in the Red Cross register. In special cases, a reply may also be sent to a postal address listed in the Red Cross register.