

## Data security statement – Marketing register

1 Register controller	The Finnish Red Cross (FRC) Tehtaankatu 1 A 00140 Helsinki, Finland Tel: +358 (0)20 701 2000
2 Contact information for matters pertaining to the handling of personal information	The Finnish Red Cross / Data security Tehtaankatu 1 A 00140 Helsinki, Finland Tel: +358 (0)20 701 2000 <a href="mailto:tietosuoja@redcross.fi">tietosuoja@redcross.fi</a>
3 Personal data group	The Finnish Red Cross / Marketing register
4 The purpose for processing personal data	<p>The purpose for processing personal data is to distribute information about the operations of the Red Cross and inspire people to take part in the activities.</p> <p>The prerequisite for processing the personal data of any data subject is a permission from that subject. The same processing principles are followed in all of the marketing registers of the Red Cross headquarters, branch offices, departments and institutions.</p> <p>The personal data in the marketing register is used for the following purposes:</p> <ul style="list-style-type: none"> <li>• Identifying people and managing users. Managing the data security of the services, as well as user authorisations and access to these services.</li> <li>• Maintenance, monitoring, analysis, statistics, development, profiling and segmentation related to appropriate contexts.</li> <li>• Managing a person’s data and contact history. Providing support and information services, managing the service measures and assuring quality.</li> <li>• Communication concerning the operations of the Red Cross and its institutions (the Blood Service, the Kontti second hand department stores, the emergency youth shelters, SPR Ensiapu Oy).</li> <li>• Marketing and distance selling, such as direct marketing, digital marketing, product marketing, requests for donations and invitations to events. Market research or opinion polls.</li> <li>• Recordings of phone calls with customers are used to verify service events, ensure the legal protection of customers and the Red Cross, and develop the quality of the service and prevent misuse, as well as for training purposes and security reasons.</li> </ul> <p>The personal data may be processed by third parties for purposes permitted by applicable legislation, including marketing, distance selling, market research and opinion surveys. These third parties may be advertising agencies, printing houses or similar cooperation partners that support the operating principle</p>

	<p>of the register and whose purpose for using the personal data is consistent with the purpose of use of the Red Cross for this register. The Red Cross has signed the necessary agreements with the third parties for the processing of personal data.</p> <p>The data subjects' personal data will be retained for three years.</p>
<p>5 The register's data content</p>	<p>The following data in the marketing register may be processed:</p> <ul style="list-style-type: none"> <li>• Identification data <ul style="list-style-type: none"> <li>○ Name</li> <li>○ Gender</li> <li>○ Date of birth</li> <li>○ Contact information: <ul style="list-style-type: none"> <li>▪ Address</li> <li>▪ Telephone number</li> <li>▪ Email address</li> </ul> </li> <li>○ User language</li> <li>○ Customer number</li> </ul> </li> <li>• Information related to the Red Cross <ul style="list-style-type: none"> <li>○ Data from profiling and on interests</li> <li>○ Campaign and contact information</li> </ul> </li> <li>• Data concerning the use of services <ul style="list-style-type: none"> <li>○ Permissions</li> <li>○ Bans against direct marketing and surveys</li> <li>○ Identifiers used to focus marketing <ul style="list-style-type: none"> <li>○ Grouping data and other information on a volunteer accumulated through analytics derived data</li> </ul> </li> <li>○ Data provided by cookies</li> <li>○ Log data</li> <li>○ Session identifiers</li> <li>○ IP addresses</li> <li>○ Payment and transaction data</li> <li>○ Recordings of customer phone calls</li> <li>○ Customer feedback</li> </ul> </li> </ul> <p>The Red Cross only stores data that is necessary for the organisation's operation and the data's purpose of use and has a legal basis for processing. Any data that has become unnecessary for its purpose of use, as well as any outdated data and data for the processing of which there is no longer any other basis, will be anonymised or disposed of in a secure manner.</p>
<p>6 Regulatory data sources</p>	<p>Personal data for the marketing register is collected via various channels on people who have provided the Red Cross with their contact information. These channels may include filling in an online form, subscribing to the newsletter, filling in a raffle card, visiting a Red Cross event or exhibitions stand, or providing contact information via telephone.</p>

	<p>Personal data is received and updated according to regulations</p> <ul style="list-style-type: none"> <li>• From people themselves <ul style="list-style-type: none"> <li>○ Via the online service</li> <li>○ During customer service</li> <li>○ With a reply card</li> <li>○ Via email</li> </ul> </li> <li>• By a Red Cross department, branch, institution or headquarters</li> <li>• Via the Population Information System's personal data updating service</li> <li>• From the registers of telephone companies or similar public enterprises</li> </ul> <p>Cookies</p> <p>The Red Cross website uses cookies. Cookies are small text files that are sent to a user's computer and stored there in order to enable the website administrator to recognise frequent visitors to the website, make it easier for users to log in and enable the compiling of data sets about visitors. With this data, the Red Cross can continuously improve the content of its website. Cookies do not harm the users' computers or files. The Red Cross uses cookies to provide users with information and services that are customised to the individual's needs.</p> <p>If a user who visits the Red Cross website does not want the Red Cross to collect the data mentioned above through cookies, they may disable the use of cookies in the browser settings. However, cookies may be necessary for the appropriate operation of some websites administered or services offered by the Red Cross, which is why the Red Cross does not guarantee the functionality of all services if the cookie function is disabled.</p>
<p>7 Regulatory disclosure of data</p>	<p>The personal data in the marketing register will not be disclosed to a party outside the organisation.</p> <p>A data subject's personal data may be disclosed to cooperation partners who participate in the implementation of the Red Cross's marketing for the purpose of forming target groups in the marketing partners' services.</p> <p>Personal data is only disclosed to the authorities if required by law, for example for investigating and preventing misuse.</p> <p>Customer data may be disclosed for marketing purposes or opinion polls.</p>
<p>8 Transfer of data outside the EU or EEA</p>	<p>Data may be transferred outside the area formed by the member states of the European Union or outside the European Economic Area to the extent necessary for the technical implementation of data processing, in which case the Red Cross complies with the requirements of the EU General Data Protection Regulation. Data may be transferred under model clauses approved by the European Commission or to recipients in the USA who are committed to the EU-US Privacy Shield arrangement. Data is transferred to the following countries outside the European Union / European Economic Area [the United States].</p>
<p>9</p>	<p>Personal data processed in physical form:</p>

<p>The principles of securing the register</p>	<p>Material that is processed in its physical form is stored and handled in monitored and locked facilities.</p> <p>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 certain 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.</p>
<p>10  The rights of a data subject</p>	<p>Data subjects have the right to:</p> <ul style="list-style-type: none"> <li>• Request a copy of their own personal data</li> <li>• Request that their personal data is amended or deleted, unless applicable data security regulations require that the data be retained.</li> <li>• Request restrictions to the processing of their personal data or oppose this processing</li> <li>• Request the right to transfer their data from one system to another, in accordance with applicable data security regulations</li> <li>• Refuse, in full or in part, any contact made for the purpose of direct marketing and research.</li> <li>• Submit a complaint to the data security authorities</li> </ul> <p>If the processing of personal data has been based on a data subject's permission, the data subject has the right to cancel their permission to process their personal data. Cancelling this permission will not affect the processing of personal data that has been conducted prior to the cancellation.</p> <p>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 specified in Section 2. If contact by email is not possible, the data subject may alternatively send a letter, contact the customer service or personally visit certain Red Cross locations. The Red Cross will deliver the reply to the data subject's email address, as listed in the register of the Red Cross. Under special conditions, the reply may be sent to a postal address that is listed in the register of the Red Cross.</p>