

Privacy Statement: Customer and Marketing Register, prepared on 18 May 2018

In compliance with the EU's General Data Protection Regulation, this information document describes the personal data processing in the Customer and Marketing Register of Hotelli Pieksämäki Oy / Hotel Savonsolmu.

The customer register privacy statement is available on Hotel Savonsolmu's website and at the hotel's reception at the controller's address.

### **1. Controller**

Hotelli Pieksämäki Oy / Hotel Savonsolmu  
Toikantie 9,  
FI-76100 PIEKSÄMÄKI  
+358 207 290 290  
info@savonsolmu.fi  
Business ID: 1048780-1

### **2. Contact for register issues**

The contact for register issues and issues related to the exercise of the data subject's rights is email: tietosuoja@savonsolmu.fi, tel. +358 207 290 290.

### **3. Name of the register**

Hotel Savonsolmu's Customer and Marketing Register

### **4. Legal basis of personal data processing**

\* Legitimate interest:

The processing of the personal data in the register is based on the private and corporate customers' customer relationship to Hotel Savonsolmu.

\* Agreement between the controller and the data subject:

The controller also processes customer data on the basis of an agreement between the controller and the data subject. This basis applies to the personal data which is collected from the customer in connection of, for example, a table or a room reservation or for the purposes of charging room and restaurant invoices.

### **5. Purpose of the personal data processing**

- \* processing and managing reservations (accommodation, meeting, restaurant and catering services)
- \* enabling the contacts necessary for customer relationship management and development (customer communication)
- \* payment, invoicing and monitoring thereof as well as possible debt collection measures
- \* storing the traveller data required by the law on accommodation activities
- \* marketing the controller's services
- \* maintaining the customer relationship and direct marketing if allowed by the customer
- \* developing the controller's business
- \* registering the wishes and interests of regular customers

### **6. Processed personal data**

The controller processes the following personal data of the customers:

- \* reservation and accommodation data: first and last name, date of birth, telephone number, email address, street address
- \* nationality
- \* data concerning reservation (e.g. the dates of arrival and departure)
- \* data on the customer's payment method, invoicing data, data on possible delays of payment
- \* information on whether the customer has prohibited the use of the data for direct marketing
- \* data on the use or purchase of services
- \* possible customer feedback or complaints
- \* data concerning the customer's wishes and choices, e.g. the location of the room, wishes relating to smoking restrictions
- \* data on regular customers' loyalty cards (e.g. card number and validity)
- \* data on possible special diets (the processed data concerns the served food only)

The controller processes the following personal data regarding corporate customers:

- \* the name, address, email address and telephone number of the corporate customer's contact person
- \* data concerning the prohibitions relating to direct marketing, distance marketing and other marketing that have been reported by the contact person and are required under the effective legislation.

#### **7. Regular data sources**

The register's data sources are the data provided by the customer and the following essential data concerning the services reserved by the customer that are collected with the customer's consent:

- \* data entered on the reservation form at the hotel's website
- \* discussions with the customer over the phone or via text messages or email
- \* accommodation or restaurant service reserved/sold via a third party (booking service company) through a booking channel. In that case, the data is disclosed between two controllers.

#### **8. Disclosure and transfer of data**

We do not disclose data to parties other than authorities required by the law.

If the controller sells or reorganises its business, the personal data shall be disclosed simultaneously.

#### **9. Transferring data outside of the EU or the EEA**

The data are not transferred outside of the EU or the EEA.

#### **10. Personal data retention period**

The personal data in the customer register are processed for the duration of the customer relationship. The controller considers a customer relationship to have ended, if the customer has not used the controller's services for a period of 3 years. The period starts from the end of the calendar year during which the customer last used the controller's services. The data are erased within 3 months from the end of the customer relationship, unless there are other grounds for storing the data.

However, the data may be stored and processed after the end of the customer relationship if it is required for processing complaint-related issues. The retention periods of the data in the customer register also comply with the retention periods laid down by laws, such as the Accounting Act. The data required by the Accounting Act are stored for as long as is required by the law.

Corporate customers' contact person data are erased similarly when the company's customer relationship is considered to have ended. However, the data may be retained after the end of the customer relationship if there are other grounds for storing them.

When the data are processed on grounds of an agreement between the controller and the data subject, the data shall be stored for as long as is required for implementing the agreement. After the agreement has been implemented, the data shall be stored for the duration of the customer relationship or for as long as there are other grounds for the processing (e.g. complaints or the Accounting Act).

Only data that are required for the defined purposes of use are processed during the customer relationship. In order to erase unnecessary data, the controller carries out periodic reviews.

When the customer relationship ends, the customer's data may be transferred to the company's direct marketing register if the customer has not prohibited the use of their data for direct marketing purposes.

#### **11. Rights of the data subject**

We collect manual and electronic data.

##### **1) Manual data**

Stored in a locked facility, or the data are entered into the hotel's system, after which the manual data are destroyed.

##### **2) Data saved on IT systems.**

Only the personnel of Hotelli Pieksämäki Oy / Hotel Savonsolmu for whom it is necessary to access the data in order to carry out their duties have access right to the data. The employees have user IDs and passwords.

The data are stored within Hotel Savonsolmu's closed network which is protected by a firewall.

Under the General Data Protection Regulation, the data subject has the following rights:

- \* The principal right of access to the personal data which have been collected on them
- \* The right to request the rectification of inaccurate data without undue delay
- \* The right to request the erasure of data if there are no legitimate grounds for the processing, or the data subject objects to the processing for direct marketing purposes, or if the personal data have been unlawfully processed
- \* The right to restrict the processing; during restricted processing, the data may principally be stored but not processed.
- \* The right to object to personal data processing on grounds relating to the data subject's particular situation if the data are processed on the grounds of a legitimate interest. If the processing is based on an agreement, the data subject shall not have the right to object to the processing. The data subject has the right to object to the use of personal data for direct marketing at any time.
- \* The right to transfer data from one system to another on the grounds of an agreement or if the data are processed automatically. The data are transferred from one controller to another if it is technically possible.

#### **12. Right to lodge a complaint with a supervisory authority**

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

#### **13. Requests relating to the data subject's exercise of their rights**

You may review the data concerning you by delivering a written, adequately specified and signed inspection request to the controller. The request may also be made in person at the controller's office. In that case, you must prove your identity with an official identification card. The right of inspection is free of charge once a year. A written response will be delivered to the customer within 30 days from the date of receiving the request.