

# Privacy Policy

Last updated on March 20th, 2023

## 1. Registerkeeper

Ostrobothnia Chamber of Commerce (OCC)

Raastuvankatu 20, 65100 Vaasa / Runebergsgatan 11, 68600 Jakobstad / Ristirannankatu 1, 67100 Kokkola

Email: K2POH.info@chamber.fi

### Contact person for matters related to the register

CEO Paula Erkkilä, paula.erkkila@chamber.fi

## Register name

Member, customer and stakeholder register

## 2. Purpose of processing personal data

Management and analysis of member, customer, and stakeholder relationships

- OCC uses your personal information to manage, analyze, and improve the customer relationship between your represented company or other organization or with you.

Provision of products and services

- OCC may use your personal information to offer products or services if your represented company or other organization or you are a member of the Chamber of Commerce, for example, purchased a service from us, used our digital services, subscribed to our newsletter, or participated in our training or events. Personal information is used to implement the rights and obligations based on the agreement or other commitment between OCC and the customer.

Customer communication and marketing

- OCC may use your personal information in its communications, such as sending you notifications related to products and services, informing you of changes to services, and requesting feedback on products and services.
- OCC may use personal information to tailor its offerings and provide relevant content. This means, for example, that we may provide recommendations or show tailored content and messages.
- OCC may publish photos of participants taken at events or training organized by it.

Development of products and services

- OCC may use your personal information to develop its products and services.

The legal basis for processing personal data is based on the following subparagraphs of Article 6 of the EU Data Protection Regulation:

- a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- b) processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract;
- c) processing is necessary for compliance with a legal obligation to which the registerkeeper is subject; and/or
- d) processing is necessary for the purposes of the legitimate interests pursued by the registerkeeper or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

OCC processes personal data of its members on the basis of the Chamber of Commerce Act and the Association Act. In addition, OCC may process your personal data in accordance with other legislation, such as the Accounting Act's obligation to retain data.

OCC has legitimate interests related to the conduct of its operations, such as the right to promote the sale of its products and services among its customers through marketing and sales methods, and OCC may, on the basis of a legitimate interest, engage in direct marketing and sales using the contact information you provide, including processing personal data for profiling. Other legitimate interests of OCC, on the basis of which your personal data may be processed, include counseling and other customer service, further development of the business, and investigation of possible misuse.

### **3. Contents of the register**

The personal data collected by OCC may include, among other things, the following types of information and changes made to them:

#### **3.1. Basic information for all registered persons**

- First and last name
- Contact information (mailing address, email address, phone numbers)
- Gender
- Service language
- Title and/or job description in current and previous positions related to OCC operations
- Name and information of the company where the registered person currently works or has worked in the past

- Technical information sent to the OCC's users digital devices (such as computers and mobile devices) and information related to cookies and other similar technologies
- Communication directed to the registered person and related actions
- Email and online chat related to customer service

3.2. Information of registered persons who have purchased OCC products or services, provided feedback, and/or made complaints about them

- Name and information of the company or other organization related to the customer relationship with OCC, where the registered person currently works or has worked in the past
- Start and end time and method of the customer relationship or similar relationship
- Campaigns and offers directed to the customer and their use
- Content of feedback and complaints, related correspondence, and follow-up actions

3.3. Information of registered persons who have participated in OCC meetings, trainings, other events, and other services

- Essential information about the organization and participation in the event
- Information about dietary preferences (specific information voluntarily provided by the user)
- Photographs taken at events or trainings.

#### **4. Regular sources of information**

The majority of the information is obtained at the beginning and during the customer or stakeholder relationship, as well as from the programs used to access our products and services. OCC also receives personal data and updates from authorities, organizations, and companies that provide credit and personal data acquisition and update services, as well as from public directories and other public sources of information, such as community websites and social media channels.

#### **5. Data disclosures**

OCC does not disclose, sell, or otherwise reveal your personal data to third parties unless otherwise stated below.

OCC may share your personal data with the member company or community where you work, when your employer requests information about their employees who have participated in OCC events, for example. OCC may also share the personal data of event participants with other participants by sharing the participant list along with other materials.

OCC may share your personal data with partners with whom OCC jointly manages and implements projects and events, such as Finland Chamber of Commerce.

OCC may share your personal data with third parties who provide services to OCC, such as customer service, software services, technical management and analysis of personal data, research, marketing, and various campaigns. OCC may also share your personal data for the collection of payments for products and services, and it may transfer or sell unpaid invoices to third-party debt collection services. Protecting your personal data is important to OCC, which is why it does not allow these parties to use data for any other purpose than to provide these services and requires them to protect user data in accordance with this privacy statement.

OCC may share your personal data with carefully selected third parties for shared or independent research, advisory, and direct marketing purposes. Information can only be shared for these purposes when the third party's intended use is not in conflict with the purposes defined in this OCC privacy policy.

OCC may share your personal data in response to a court order or similar directive.

## **6. Transfer of data outside the EU**

OCC does not transfer or disclose the customer's personal data to outside the European Union or the European Economic Area unless it is necessary for the purposes of processing the personal data or for the technical implementation of the processing, in which case the transfer of data will comply with the requirements of data protection legislation.

## **7. How long do we process your personal data?**

OCC processes your personal data in this register for as long as OCC has a valid legal basis for the processing of the data described in section 2 of this privacy policy, and for a reasonable period thereafter.

## **8. Right to access and correct personal data**

Everyone has the right to access their own personal data contained in the register. Requests for information should be made to the Vaasa office of the Ostrobothnia Chamber of Commerce in person or by personally signed letter. The request for access must include the necessary information for finding the data: name, address, email and telephone number. The response to the request for access will be sent to the requester by post. A reasonable fee may be charged for the request. Generally, we fulfill access requests within one month.

Upon request of the customer, we will make necessary corrections and additions to the customer data, or remove data that is incorrect, unnecessary, incomplete or outdated for the purpose of processing. In addition, the data is updated on our own initiative and outdated data is regularly removed.