



Privacy policy and privacy statement (processing statement)

This is the privacy policy and privacy statement according to the EU's General Data Protection Regulation (GDPR) for newsletters aimed at potential new tenants of shopping centre Hansakortteli.

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1. Data controller

Kauppakeskus Hansa Ky

Kristiinankatu 9 2.krs, 20100 Turku

2. Contact persons responsible for the data file

Mirva Järvinen (responsible for the data file)

Marketing Manager

Tel. +358 44 286 9791

mirva.jarvinen@hansakortteli.fi

Lauri Takkinen (Data Protection Officer)

Security and Quality Manager

Tel. + 358 50 340 7252

lauri.takkinen@hansakortteli.fi

3. Name of data file

Shopping centre Hansakortteli's newsletter for potential new tenants

4. Legal basis and purpose of processing personal data

The purpose of the Hansakortteli's data file (a newsletter for potential new tenants) is marketing and advertising for the data subjects. The legal basis for the processing according to the EU's General Data Protection Regulation is the written, specific consent given by the data subject for direct marketing, which the data subject gives when ordering a newsletter aimed at potential new tenants. The personal data contained in the data file is not subject to automatic decision-making or profiling in such a way that it would have an impact on you.

5. Data content and storage of data file

The data file contains the names (first name and surname) and e-mail addresses of the data subjects. The data file is stored and maintained in the information systems of external service providers. The personal data of persons having subscribed to the newsletter is stored until the data subject indicates that they no longer wish to receive shopping centre Hansakortteli's newsletter in their e-mail.

6. Regular sources of information

The data collected in the data file is obtained from the data subject themselves / from public sources.

7. Regular disclosure and transfer of data outside the EU or EEA

The data is not regularly disclosed. The data controller may use external service providers for marketing. In addition, the data may be disclosed to Kauppakeskus Hansa Ky's contractual partners (service providers) for tasks related to the direct marketing of shopping centre Hansakortteli. The service providers either act as independent data controllers or a separate agreement has been concluded with them for data processing on behalf of Kauppakeskus Hansa Ky. Otherwise, we will only disclose personal



data as permitted and/or required by applicable laws to parties who have the right to obtain information from the data file based on law, a collective agreement and/or some other agreement.

The data controller transfers personal data outside the EU or EEA. Where personal data is processed outside the EU or EEA, we will ensure that the subcontractor is committed to the European Commission's principles on the processing of personal data.

8. Data file protection principles

The data controller has taken administrative and technical measures to secure data protection and has obligated the personal data processor to take similar measures.

- **Systems containing data:**
Workstations and systems in use are protected with user IDs and passwords.
- **Located in a technically supervised space**
- **Actions/events saved in a system log**
- **People who process the data (data processor):**
Access to the system containing personal data is only restricted to those employees who are entitled to process the data by virtue of their job.
- **Confidentiality agreement/secretcy obligation**
- **Administrative arrangements/instructions**
- **Internal audits**
- **Manual material (printouts)**
The data is stored in a locked office space.

Only persons employed by the data controller who are entitled to process the data by virtue of their job have access to the data in the data file. The data controller shall ensure that the stored data and access rights to the system and other data critical to the security of personal data are processed confidentially and only by the employees in whose job description processing the data belongs, and has also obliged the processor of the personal data to act accordingly.

9. Right of inspection and right to request rectification of data

Every person in the data file has the right to inspect the data stored in the data file and to request rectification of any inaccurate data or the completion of incomplete data. If the person wants to inspect or request rectification of the data stored about them, the request must be sent in writing to the contact person indicated in Section 2.. The person making the request can be asked to prove their identity, where necessary. The contact person mentioned in Section 2 will reply to the person making the request within the timeframe set by the EU's General Data Protection Regulation (as a rule within one month).

10. Other rights related to the processing of personal data

A person in the data file has the right to request the erasure of their personal data from the data file ("right to be forgotten"). Data subjects also have other rights under the EU's General Data Protection Regulation, such as the restriction of the processing of personal data in certain circumstances and the right to lodge a complaint about the processing of personal data with a supervisory authority. In so far as the processing is based on consent, the data subject also has the right to withdraw their consent at any time free of charge. Each direct marketing letter contains a link through which consent can be withdrawn. The withdrawal of consent does not affect the lawfulness of processing that took place before the withdrawal.

Requests must be sent in writing to the contact person indicated in Section 2. The person making the request can be asked to prove their identity, where necessary. The data controller's contact person will reply to the person making the request within the timeframe set in the EU's General Data Protection Regulation (as a rule within one month). Data subjects are informed about the processing of their personal data in the subscription form of the direct marketing letter. By subscribing to Hansakortteli's newsletter, the data subject agrees to the storage of their data in Hansakortteli's customer data file and to the processing of their data for Hansakortteli's marketing and the activation of customer benefits in accordance with the principles set out in this document.