Systems Change Finland Privacy Policy

- 1. Introduction
- 2. Who we are
- 3. Companies and websites within scope
- 4. Collection of personal data
- 5. Lawful basis for the processing of personal data
- 6. Storage of personal data
- 7. Security measures
- 8. Your rights as a data subject
- 9. Contact us
- 10. Complaints

1. Introduction

We appreciate the trust you place in us when sharing your personal data. The security of that data is very important to us. On this page, we will explain how we collect, use and protect your personal data.

We will also explain what rights you have with regards to your personal data and how you can exercise those rights.

2. Who we are

We are a registered association called Systems Change Finland - Systeeminen muutos Suomi ry. Our Business ID/Y-tunnus is 3152009-2.

Our office address is:

Systems Change Finland Repovuorentie 20a 00670 Helsinki If you have questions about how we process personal data, or would like to exercise your data subject rights, please contact someone in our Admin circle that you can find on our <u>Team-page</u>.

3. Websites within scope

The following websites are within scope for this privacy notice:

Systems Change Finland's web page: http://systemschange.fi

We consider these websites to be EU-based websites; see section 6 below for more information on non-EU data storage.

4. Collection of personal data

We collect personal data from you for one or more of the following purposes:

- 1. To make easy membership payments possible on the web site;
- 2. To initiate and complete commercial transactions with you, or the entity that you represent, for the purchase of products and/or services (such as event tickets):
- 3. To fulfil a contract that we have entered into with you or with the entity that you represent (such as partnership agreements);
- 4. To manage any communication between you and us (such as replying to contact form submissions);
- 5. To manage the Systems Change Finland membership registry.

The table in Section 5 below provides more detail about the data that we collect for each of these purposes, the lawful basis for doing so, and the period for which we will retain each type of data.

5. Lawful basis for the processing of personal data

The table below describes the various forms of personal data we collect and the lawful basis for processing this data.

Our infrastructure means that all personal data is processed on common, association-wide platforms. We have processes in place to make sure that only those people in our association who need to access your data can do so. By default, only the people in our Admin circle have access to all collected personal data and others, such as core team members, are granted access on an as-needed basis.

A number of data elements are collected for multiple purposes, as the table below shows. Some data may be shared with third parties and, where this happens, this is always indicated in the relevant registry description.

We collect the following types of personal information on the legal grounds of legitimate interests, contractual performance, and/or consent where applicable:

Name
Country
Address
Phone
Email address

6. Storage of personal data

Systems Change Finland - Systeeminen muutos Suomi ry is an EU-domiciled organisation whose primary offices are in Finland.

Our websites are hosted in the EU.

We use the following services to collect, process, and/or store personal information: <u>Google, Trello, WordPress, Slack, MailChimp, Yhdistysavain</u>.

Our payment processors and banking arrangements are provided by <u>Stripe</u>, <u>Paypal</u> and <u>Transferwise</u>, which are based in the EU.

Your data is stored for the duration of the membership and up to 12 months after it ends.

7. Security measures

We have what we believe are appropriate security controls in place to protect personal data. Risk assessment, including assessing risks to the rights and freedoms of data subjects, is at the heart of our project. We do not, however, have any control over what happens between your device and the boundary of our information infrastructure. You should be aware of the many information security risks that exist and take appropriate steps to safeguard your own information. We accept no liability in respect of breaches that occur beyond our sphere of control.

As a data subject whose personal information we hold, you have certain rights. If you wish to exercise any of these rights, please email the association's chairman or use the information supplied in the Contact us section on our website. In order to process your request, we will need to verify your identity. Your rights are as follows:

The right to be informed

As a data controller, we are obliged to provide clear and transparent information about our data processing activities. This is provided by this privacy notice and any related communications we may send you.

The right of access

You may request a copy of the personal data we hold about you free of charge. Once we have verified your identity and, if relevant, the authority of any third-party requester, we will provide access to the personal data we hold about you as well as the following information:

- a) Why we have your data
- b) What types of data we have
- c) Who can access your data
- d) For how long we foresee storing this data

If there are exceptional circumstances that mean we can refuse to provide the information, we will explain them. Otherwise, we will comply with all data requests. If answering requests is likely to require additional time, we will inform you.

The right to rectification

When you believe we hold inaccurate or incomplete personal information about you, you may exercise your right to correct or complete this data. This may be used with the right to restrict processing to make sure that incorrect/incomplete information is not processed until it is corrected.

The right to erasure (the 'right to be forgotten')

Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data. We will take all reasonable steps to ensure erasure.

The right to restrict processing

You may ask us to stop processing your personal data. We will still hold the data, but will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies you may exercise the right to restrict processing:

- a) The accuracy of the personal data is contested
- b) Processing of the personal data is unlawful

- c) We no longer need the personal data for processing but the personal data is required for part of a legal process
- d) The right to object has been exercised and processing is restricted pending a decision on the status of the processing

The right to data portability

You may request your set of personal data be transferred to another controller or processor, provided in a commonly used and machine-readable format.

The right to object

You have the right to object to our processing of your data where

Processing is based on legitimate interest;

Processing is for the purpose of direct marketing; or

Processing is for the purposes of scientific or historical research.

9. Contact us

Any comments, questions or suggestions about this privacy notice or our handling of your personal data should be emailed to the chairman of the association's board or person in charge of membership issues that can be found on our <u>Team-page</u>.

Alternatively, you can contact us at our office using the following postal address:

Data Protection Officer Systems Change Finland Repovuorentie 20a 00670 Helsinki

10. Complaints

Should you wish to discuss a complaint, please feel free to contact us using the details provided above. All complaints will be treated in a confidential manner.

Should you feel unsatisfied with our handling of your data, or about any complaint that you have made to us about our handling of your data, you are entitled to escalate your complaint to a <u>supervisory authority within the European Union</u>.