

Privacy Notice – Prize Draw Register

This privacy notice is an AI-generated translation. The legally valid privacy notice is available in Finnish

Privacy Notice – Prize Draw Register

1. Controller and Contact Person

Controller

Industrial Union (Teollisuusliitto ry)
Business ID: 0201717-2

Contact for Data Protection Matters

Email: tietosuojavastaava@teollisuusliitto.fi
Tel: +358 20 774 001
Industrial Union / Data Protection Officer
P.O. Box 107, FI-00531 Helsinki, Finland

2. Categories of Data Subjects

This register contains personal data of individuals who have participated in a prize draw organised by the Industrial Union.

3. Purpose and Legal Basis for Processing

Only the personal data necessary for administering the prize draw is collected.

The legal basis for processing is:

- **Performance of a contract** meaning that if a participant wins the prize draw, the Union must be able to contact them and deliver the prize.

4. Personal Data Processed in the Register

The register may include the following data categories:

- Name
- Email address
- Telephone number
- Information related to the prize draw, such as:
 - the participant's selected prize option (if multiple options are available)
- Postal address (when the prize needs to be physically delivered)

The register may also contain notes made by the controller related to the prize draw.

5. Personal Data Retention Period

Personal data of prize draw participants is retained **until the prize has been delivered** to the winner.

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Data of the winner(s) may, based on the controller's legitimate interest, be stored **slightly longer**, but **no later than the end of the same calendar year**.

6. Regular Sources of Information

Personal data is obtained directly from the participants themselves. Information is used solely for the specific prize draw unless otherwise stated.

The register may also include notes made by the controller about the data subjects.

7. Rights of the Data Subject

The data subject has the following rights under the GDPR:

- **Right to be informed** about the processing of personal data
- **Right of access** to their personal data
- **Right to rectification** of inaccurate or incomplete data
- **Right to erasure** when:
 - processing is based on consent
 - erasure does not conflict with legal obligations or public interest
 - the data is no longer necessary for its original purpose
- **Right to withdraw consent** at any time
- **Right to object** to processing insofar as processing is based on consent
- **Right to data portability**, provided that:
 - the data has been supplied by the data subject
 - processing is based on consent
 - processing is automated
- **Right to restriction of processing**, for example by requesting the cessation of direct marketing

Requests must be submitted using the contact information provided in section 11.

The Industrial Union may request verification of identity before processing the request and may refuse it when permitted by law.

A data subject may exercise these rights **once per year free of charge**.

Right to lodge a complaint

The data subject has the right to lodge a complaint with the Data Protection Ombudsman in Finland, or with the supervisory authority of the EU Member State of their residence or workplace, if they believe their personal data has been processed unlawfully.

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8. Disclosure and Transfer of Personal Data

Personal data may be disclosed to another controller only if the data subject has given **explicit consent** when providing their information or afterwards.

In this context, “another controller” does **not** include subcontractors but refers to organisations that use personal data for their own purposes.

The Industrial Union may use subcontractors for conducting the prize draw or delivering prizes. Depending on the prize, personal data may be processed by:

- Posti Oy
- Prize provider, such as an online store or another partner company

9. Transfers of Personal Data Outside the EU/EEA

As a rule, personal data is **not** transferred outside the EU/EEA.

If personal data is processed outside the EU/EEA, the Industrial Union ensures that:

- the transfer is based on valid legal grounds, and
- appropriate safeguards required under the GDPR are in place

Personal data may be processed in cloud services located outside the EU/EEA if the service provider is committed to GDPR compliance.

10. Data Security

Digitally processed personal data is protected and stored in systems managed by the Industrial Union, with access limited to individuals who require the data for their work duties. These individuals use personal usernames and passwords. Storing personal data on paper is avoided.

Personal data sent outside the Union is encrypted.

Workstations and storage media used for processing personal data are also encrypted.

11. Contact Information

Requests regarding data subject rights, questions about this Privacy Notice and other enquiries may be submitted by email to:

tietosuojaava@teollisuusliitto.fi

Alternatively, the data subject may contact the Union personally or in writing at:

Data Protection Officer

Industrial Union (Teollisuusliitto ry)

P.O. Box 107, FI-00531 Helsinki

Tel. +358 20 774 001

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12. Updates to This Privacy Notice

This Privacy Notice may be updated from time to time, for example due to legal or administrative changes.

Last updated: 10 December 2021