

Data controller's notification  
to the data subject

EU's General Data Protection Regulation,  
(2016/679), Articles 13 and 14

22.7.2022

## Person register information

### 1. Name of register

Customer and marketing register

### 2. Purpose of personal data processing

Establishment, management, maintenance, and development of the customer relationship and related invoicing. The data controller shall also process personal data for marketing purposes, identifying individuals, and preventing and investigating misuse.

The information content of the register shall be collected directly from the data subject.

### 3. Data controller

The data controller is Tampereen Sähkölaitos Oy (business ID 0153791-8).

The group acts as one of the data controllers, so this also covers the subsidiaries Tampereen Sähköverkko Oy (19506810) and Tampereen Vera Oy (1950694-1).

### 4. Contact person for the register and contact information

Marianne Toivonen

Tampereen Sähkölaitos Oy

Address: Voimakatu 17

Telephone: 020 630 3001

tietosuoja@sahkolaitos.fi

### 5. Processing of personal data in the register has been outsourced under a commission agreement

No

Yes

Data processing has been outsourced to partners and system providers.

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## 6. Legal basis for personal data processing

A)

Implementation of the agreement

Consent

Legitimate interest

Legitimate interest shall be applied to the recording and use of the telephone conversations of Tampereen Sähkölaitos.

Information in the register shall be used for automated data processing

No

Yes

The data in the register shall be used for automated data processing, but without automated individual decisions. Personal data shall be used for profiling, the purpose of which is to help develop products and services to make them more attractive and enable their more accurate targeting. According to estimates, profiling does not pose any risks to the data subject.

## Personal data in the person register, data sources, and disclosure of data

### 7. Personal data in the register

Description of data subject and personal data categories:

Data related to the identification of a person, such as name, address, housing type, telephone number, email address, and personal identity code. In a customer relationship where the data subject represents a company or other entity: the contact details of that company or other entity, such as business ID, name, address, and telephone number, and any marketing bans for both customer categories. If the data subject visits one of the customer service points of Tampereen Sähkölaitos, their picture may be recorded in the visiting system and/or on video. Voice data of the data subject shall be processed when they call our service number, and the call shall be recorded. When visiting our website, the IP address and cookie data of the visitor shall be saved.

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For marketing purposes, we shall also collect data about potential customers. The collection of data is based on consent, which can be withdrawn at any time by sending email to [asiakaspalvelu@sahkolaitos.fi](mailto:asiakaspalvelu@sahkolaitos.fi).

In addition, service and product-specific data, such as service-specific measurement data and energy consumption measurement data, as well as invoicing information, shall be processed. The above information shall also be used for analytical purposes, so that the data controller can better develop and target its services.

#### 8. Register contains manual (paper) material

No

Yes

Material (incl. customer agreements) has been archived in accordance with the obligations of the data controller.

#### 9. Data sources for the register

From the data subject.

#### 10. Data protection principles

Customer data may only be processed by personnel who need the information for their work tasks. The data is protected against unauthorised use by technical and organisational means. All processors of personal data are trained to ensure that data protection is taken care of and maintained to an appropriate extent.

#### 11. Disclosure of personal data in the register

Regular disclosure of information

No

Yes

#### Recipients

Data shall be disclosed by proxy to property agents and/or property managers. If necessary, data shall also be disclosed to the police and/or the collection company. For the payment of

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bonus, invoicing information shall be disclosed to S-Group. On a service-specific basis data shall be disclosed to collaboration partners.

#### **Grounds for disclosure of data**

Implementation of the agreement, public and/or vital interest.

#### **12. Transfer of register data outside the EU or European Economic Area (EEA)**

Primarily Sähkölaitos does not pass on personal data outside the European Union (EU) or European Economic Area (EEA). However, if we do transfer personal data outside the EU or EEA areas, we apply appropriate protection measures in accordance with current data protection legislation, such as model contractual clauses approved by the European Commission.

Tampereen Sähkölaitos protects its website forms from spam and malware using the reCAPTCHA service provided by Google LLC. reCAPTCHA prevents malicious software from engaging in abusive activities on websites by distinguishing between bots (automated programs) and human users. reCAPTCHA is used to run the internal infrastructure of the Tampereen Sähkölaitos website, and it identifies bots with the aid of browser information, including the IP address, cookies, login information, browser type and version information, time zone settings, location, operating system and version, cursor or mouse movement information, and user input activity. The service does not allow Tampereen Sähkölaitos access to any of this information.

Information obtained through use of the service may be combined with other data held by Google LLC if you have logged in to your Google account when using the service. Your use of the service is subject to Google LLC's privacy policy: [Privacy Policy – Privacy and Terms of Use – Google](#).

#### **13. Personal data retention periods / criteria for determining the retention period**

Tampereen Sähkölaitos has a valid records management plan with specified retention periods. The retention periods are based on the agreement's period of validity and the subsequent period, which is determined on the basis of, e.g., the organisation's accounting obligation and other statutory obligations.

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#### 14. Rights of the data subject

**Right of inspection:** The data subject has the right to know what personal data has been saved about them and, if necessary, to correct and/or supplement the data. When exercising the right of inspection, the data subject must be prepared to be identified, for example, with an official identity card approved by the authorities.

**Right to object:** The data subject may object to the processing of personal data if they feel that their personal data has been processed contrary to the legal basis and/or misused.

**Right of appeal:** The data subject may also file a complaint on the data processing with the data protection ombudsman if they feel that the data has been processed wrongly and/or contrary to its intended purpose.

**Ban on direct marketing:** The data subject may prohibit Tampereen Sähkölaitos from using their personal data for direct marketing. You can withdraw your direct marketing consent by sending email to [asiakaspalvelu@sahkolaitos.fi](mailto:asiakaspalvelu@sahkolaitos.fi).

**Right to deletion of data:** The data subject can request Tampereen Sähkölaitos to delete the data concerning them. In that case, Tampereen Sähkölaitos will delete the data if there is no legal basis for storing it.

The customers of the Tampereen Sähkölaitos group may exercise their rights at any time. Tampereen Sähkölaitos Oy shall verify the identity of each data subject. If the data subject exercises their rights more than once a year, an administrative fee will be charged for it.