

KULTARANTA RESORT OY CUSTOMER REGISTER

This document is an information notice about the processing of personal data in the customer register of Kultaranta Resort Oy in accordance with the EU General Data Protection Regulation.

1. Data controller

Kultaranta Resort Oy (2041187-8)
Särkänalmentie 178 21100 Naantali Suomi
tel. +358 75 326 6000 myyntipalvelu@kultarantaresort.fi

2. Contact person in matters concerning the register

In matters related to the register and the use of the rights of the registered person, the contact person is Valtteri Myrskyluoto, +358 50 492 8688, valtteri.myrskyluoto@kultarantaresort.fi

3. Register name

Kultaranta Resort Oy Customer register

4. Legal basis for processing personal data

The processing of personal data is based on the customer relationship between the customer and Kultaranta Resort Oy.

5. The purposes of processing personal data

The purposes of processing personal data in the customer register are:

- Managing customer relationships
- Communicating with customers
- Handling customer reservations
- Selling and delivering services
- Processing personal data related to payment, invoicing, monitoring and collection of payments
- Developing the business and customer service of Kultaranta Resort Oy
- Using special dietary information only for food preparation and service

6. Personal data to be processed

The personal data processed by Kultaranta Resort Oy may include the customer's name, date of birth, phone number, address, email address, nationality, reservation details, payment information, any specific choices or preferences of the customer, feedback or complaints, and any special dietary requirements.

The data controller processes the following personal data concerning its corporate customers:

- Name, address, email address, and phone number of the corporate customer's contact person
- Direct marketing, distance selling, and other direct marketing prohibition information reported by the company's contact person in accordance with the legislation
- Possible customer feedback and complaint information.

7. Where the personal information is obtained

The customer register may receive personal data from the customers themselves, from the use of services, or from third-party booking services such as hotels and golf course reservation services.

8. Personal data recipients or recipient groups

Companies that process personal data on behalf of the data controller are considered processors under the GDPR. The processor acts as a service provider who delivers customer registry software and related maintenance services to the data controller. There is a written agreement between the data controller and the processor.

9. Data transfer outside the EU

Data is not transferred outside the EU.

10. Personal data retention period

The personal data of the customer in the customer register is processed for the duration of the customer relationship. The registrar considers the customer relationship to have ended if the customer has not used the services of the registrar company for five years. The time is calculated from the end of the calendar year in which the customer last used the company's services. The data will be deleted after the end of the customership within six months, unless there is another basis for keeping the data.

However, after the termination of the customership, the data can be stored and processed if it is necessary for processing complaints. The retention period of the data in the customer register also complies with the retention periods required by law, such as the Accounting Act. Information required by the Accounting Act is stored as long as required by the Accounting Act.

The contact information of business customers is deleted in a similar way after the company's customership is considered to have ended. However, the data can be kept after this if there is another reason for doing so. When data is processed pursuant to an agreement between the data controller and the data subject, the data is stored as long as the data is needed to implement the agreement. After the contract has been completed, the data is stored as long as the customer relationship exists or there is another basis for the processing (e.g. complaint cases and accounting law).

During the customer relationship, only information that is necessary for the defined purposes of use is processed. The registrar regularly performs periodic inspections to remove unnecessary data.

11. About the rights of the registrant

The personal data in the customer register is processed based on the legitimate interest of the data controller (data protection regulation article 6 article 1 point e subsection). In this case, the legitimate interest is the customer relationship. Personal data is also processed on the basis of an agreement between the data controller and the data subject (data protection regulation article 6 article 1 point b subsection). This processing basis is explained in more detail in section 4 of the privacy statement.

When data is processed based on a legitimate interest and a contract, the data subject has the following rights.

The registrant's right to access his/her own data:

The registrant has the right to request access to his/her information (=right of inspection) in order to find out whether the information concerning him/her is processed in the member register or not.

As a general rule, the registered person has the right to find out what information about him is stored in the customer register. The controller may ask the registrant to specify in a sufficient manner which information or processing actions the registrant's request applies to.

The registrant's right to receive the information can be limited or refused under the data protection regulation, if providing the information would adversely affect the rights and freedoms of others. Such protected rights include, for example, the business secrets of the data controller or the personal data of another person. The data subject's right may also be limited in national legislation (such as the Data Protection Act).

Right to rectification of data:

Based on it, the data subject has the right to demand that the data controller correct inaccurate and incorrect personal data concerning the data subject without undue delay.

The right to delete data:

The controller must, at the request of the data subject, delete personal data concerning the data subject without undue delay, if one of the following conditions is met:

- personal data is no longer needed for the purposes for which it was collected or for which it was otherwise processed
- the data subject objects to the processing of personal data and there is no justified reason for the processing
- the data subject objects to the processing of personal data for direct marketing (processing is possible in this case, however, for other purposes)
- personal data has been processed illegally

Even if one of the conditions is met, the data does not need to be deleted if the processing is necessary, for example, to comply with a legal obligation requiring processing based on EU law or national legislation applicable to the data controller, or to prepare, present or defend a legal claim.

The right to object to the processing of your data:

The registered person has the right to object to the processing of his personal data on grounds related to his personal special situation, when the data is processed on the basis of a legitimate interest.

The data subject does not have the right to object to the processing of personal data when the processing is based on an agreement between the data controller and the data subject.

If the data subject has objected to the processing of his data on grounds related to his personal special situation, the data subject must specify the special situation based on which he objects to the processing based on a legitimate interest. The data controller may continue to process the data despite the objection if there is a significantly important and justified reason for the processing that overrides the interests, rights and freedoms of the data subject or if it is necessary to prepare, present or defend a legal claim.

The registered person has the right at any time to object to the use of personal data about him in direct marketing. If the data subject objects to the use of personal data in direct marketing, the data may no longer be processed for this purpose.

The right to request restriction of processing:

At the request of the data subject, the controller must restrict the active processing of personal data in the following situations.

- the data subject disputes the accuracy of the personal data, in which case the processing must be limited until the controller can verify the accuracy of the data
- the processing is against the law and the data subject requires the restriction of the processing of the data instead of deleting the personal data
- the controller no longer needs the personal data in question for the purposes of the processing, but the data subject needs them to prepare, present or defend a legal claim, or

- the data subject has objected to the processing of personal data (above about the right to object) and the evaluation of whether the legitimate grounds of the data controller supersede the grounds of the data subject is in progress.

As long as the restriction on processing lasts, the data may in principle only be stored. Data may also be processed to prepare, present or defend a legal claim or to protect the rights of another natural person or legal entity or for reasons of important public interest. Before the processing restriction is removed, the data subject must be notified.

The right to transfer data from one system to another:

Insofar as the data subject has himself submitted personal data to the customer register, which is processed by means of automatic data processing and pursuant to an agreement between the data controller and the data subject, the data subject has the right to receive such data in a machine-readable form, as well as to have the personal data transferred directly from one data controller to another, if it is technically possible.

12. The right to file a complaint with the supervisory authority

The data subject has the right to file a complaint with the competent supervisory authority if the data subject considers that the data controller has not complied with applicable data protection regulations in its operations.

13. Requests related to the exercise of the registrant's rights

For questions related to the processing of personal data and in situations related to exercising one's own rights, the data subject can contact the controller's contact person mentioned in point 2.

A request regarding the right of inspection or other request regarding the exercise of the data subject's rights must be made to the controller in writing either by email or by post. The request can also be submitted in person at the registered office.

The controller may ask the registrant to specify in a sufficient manner which information or processing actions the registrant's request applies to.

In order to ensure that personal data is not disclosed to anyone other than the registered person in connection with the use of the registered person's rights, the controller may, if necessary, ask the registered person to submit a signed inspection request. The registrar can also ask the person making the request to prove their identity with an official ID or another reliable way.