

This is the register and data protection report of the customer register of HA Neighbours, coordinated by Centrum Balticum Foundation, issued in accordance with the Personal Data Act (Sections 10 and 24), and the EU's General Data Protection Regulation (GDPR). It was drafted on 16 May, 2018. The most recent change was made on 16 May, 2018.

1. Registrar

Centrum Balticum Foundation
Vanha Suurtori 7
20500 Turku, Finland
centrumbalticum(at)centrumbalticum.org
+358 44 18 223

2. The person in charge of the registrar

Communications Manager, Acting Deputy Director Terhi Luukkainen
+358 44 18 223
firstname.lastname(at)centrumbalticum.org

3. Name of the register

The register is called the Information and Stakeholder Register of HA Neighbours.

4. The purpose of the register of HA Neighbours/ the purpose of handling personal data

The purpose for which the information in the personal data register is used is to give out information on the activities of HA Neighbours and stakeholder communications. We use the personal data register for sending out electronic newsletters and invitations, as well as for providing information about events and services. We handle personal data in matters related to the management of communications, such as reader surveys and responding to feedback.

With the help of the register we are able to target various stakeholder groups with relevant content.

5. The information content of the register and sources of information, in accordance with the rules

We collect and handle the following data:

- The person's work e-mail address / e-mail address
- The name of the person's employer organisation
- The surname and given name of the person
- The person's mother tongue (or the language in which the person wishes to receive content)
- The person's work address, telephone number and title
- Information on requests to send communications or marketing communications sent by the person
- Information on prohibitions on communications and marketing
- Information fed into contact forms
- Information fed through blogs
- Customer feedback information
- The data subjects may be processed on the basis of the e-mail address in order to receive relevant communications from HA Neighbours

In the use and development of the services we may handle the following personal data:

- IP address information or other identifiers
- Information collected from cookies
- Data collected from the use of the centrumbalticum.org web service, offered by Google Analytics

We also receive personal data from the following sources:

- Information connected with the use of social media
- Social media services themselves define the kind of information they offer their users and in what time period

On the basis of the consent of the person involved, we collect and handle other information on a case-by-case basis. We collect personal information primarily from the persons themselves in connection with contacts that are made and order forms. We may collect information about customers from public sources and registers, based on gaining permission from the customer or as set by law (for example, the Personal Data Act, Section 19, paragraph 3).

We collect visitor information from the ha-neighbours.eu webpage for the development of the website and for targeting content that is relevant to visitors with the help of the Google Analytics system and cookies. It is possible to cancel Google Analytics monitoring by following the instructions of the service provider.

6. Data systems using the register

Our register can be used by the following data systems:

- Google Analytics and Google AdWords Google and the GDPR
- The MailChimp e-mail service MailChimp and the GDPR
- ha-neighbours.eu (WordPress)
- HA Neighbours' social media channels

7. Normal handing over of data

Data is not normally given to outside parties.

8. Passing on information outside the EU or European Economic Area

HA Neighbours uses the MailChimp e-mail service in newsletters, marketing events and communications. User information moved to MailChimp includes the user's given name, surname and e-mail address. MailChimp is a US-based company, which means that personal data is moved outside the EU. However, the personal data is encrypted in the manner required by the Personal Data Act and MailChimp is on the list of companies certified by the EU-US Privacy Shield framework, an agreement between the USA and the EU.

9. Storage time for personal data

We do not store personal data longer than is necessary for the purpose for which it is used, or alternatively, we store it for a period that we have defined with our service providers / cooperative partners in our data security and data protection agreements. The storage times of personal data vary according to the purpose of its use and the situation. We update personal information when necessary and we remove unnecessary information.

10. The principles of the protection of the register

We keep personal data in electronic form on the servers of our service providers. These are protected through agreements that follow general practices made between us (HA Neighbours) and our service providers. We do not disclose used or handled personal data to anyone other than those who need it for their work or our cooperative partners, to whom it is disclosed in confidence and to a limited degree (determined on the basis of agreements). We restrict access to personal data through user codes, passwords and access rights.

11. Right of inspection

Each individual has the right to inspect personal data about herself or himself from our customer and stakeholder register, in accordance with Sections 26-28 of the Personal Data Act.

Inspection requests are sent to HA Neighbours at the following postal address:

Centrum Balticum Foundation
Vanha Suurtori 7
20500 Turku, Finland

or to the following e-mail address: [centrumbalticum\(at\)centrumbalticum.org](mailto:centrumbalticum(at)centrumbalticum.org).

12. The right to demand the correction of data

Those who are registered have the right to request that we correct erroneous, unnecessary, obsolete or incomplete personal information. Under Section 29 of the Personal Data Act, requests to correct a specific error are sent to HA Neighbours at the following postal address:

Centrum Balticum Foundation
Vanha Suurtori 7
20500 Turku, Finland

or to the following e-mail address: [centrumbalticum\(at\)centrumbalticum.org](mailto:centrumbalticum(at)centrumbalticum.org).

13. Other rights pertaining to the handling of personal data

If we process data on the basis of a person's consent, he or she may withdraw consent at any time by giving notice by e-mail to the address:

[centrumbalticum\(at\)centrumbalticum.org](mailto:centrumbalticum(at)centrumbalticum.org)

14. Data protection report update

Updates may be made to this data protection report, for instance, if our operating methods or systems change/develop or if data protection recommendations change. We might also have to make updates if legislation changes.