

15/11/2018

DESCRIPTION OF FILE OF THE CARUNA GROUP'S CUSTOMER REGISTER

1. Data Controller

Caruna Oy, business ID 1618314-7
Caruna Espoo Oy, business ID 2059588-1
Both companies hereinafter jointly 'Caruna'

Visiting address: Upseerinkatu 2, Espoo
Postal address: PL 1, 00068 CARUNA
Tel: 020 520 20
Website: www.caruna.fi

2. Responsible Person

Responsible Person:	Sanna Turunen tietosuoja@caruna.fi
Data Protection Coordinator:	Tanja Koikkalainen tietosuoja@caruna.fi

3. Name of the Register

Customer register

4. Purpose of Processing Personal Data

Caruna collects and processes personal data of its customers as well as other persons related to the handling of customer relationships (data subjects) for the following purposes:

- Implementation, maintenance and development of customer relationships
- Identifying customer relationships and data subjects
- Analysis, offering, development and direct marketing of the use of the services produced by Caruna and its group companies as well as their business partners in relation to the customer relationship. The customer data may be profiled while developing and targeting Caruna's services not effecting to the availability of services. The services ordered by the customer and the customer's personal interests may be utilized during the profiling process.
- Tracking and collection of payments
- Verifying customer orders and changes
- Customer communications
- Implementing customer satisfaction surveys and other corresponding surveys
- Compiling statistics

The main justification for processing personal data is the contractual relationship between Caruna and its customer or preparatory measures for a contract. The processing of personal data is based on the customer relationship between Caruna and the customer and on the fulfilment of the rights and obligations arising from that relationship.

With respect to direct marketing, profiling and customer surveys, the data processing carried out by Caruna and the business partners it uses is based on legitimate interest.

The processing is also based on compliance with statutory obligations. Caruna has such obligations particularly arising from electricity market legislation and authority regulations issued under said legislation. These obligations concern, for example, supplying services related to electricity distribution, measuring energy consumption and invoicing customers.

15/11/2018

When processing personal data, Caruna complies with the applicable legislation, such as electricity market legislation, energy efficiency legislation and data protection legislation.

5. Content of the Register

In connection with the register, data registered for the purposes listed in section 4 can be processed, such as:

- Basic information on the data subject (name, personal identification number, contact information)
- Basic information on contact persons who are not consumer customers (name, contact information)
- Data related to the implementation and handling of the customer relationship, the customer's needs and wishes and communication with the customer
- Data related to the contractual relationship and the services and products it covers
- Metering and installation data concerning the place of electricity use
- Payment information
- Invoicing and payment transaction data
- Information on customer notification of electromagnetic hypersensitivity
- Data on direct marketing and similar consents and blocks

Providing basic data on the data subject and invoicing data is a requirement for Caruna to supply services. Furthermore, statutory obligations require that Caruna collect, for example, data on the data subject's consumption and production of energy. Failing to provide the required information or prohibiting their collection can hinder or completely prevent Caruna's ability to provide services.

As described in section 10 below, the data subject has the right to prohibit or restrict the processing of his or her data, for example, the right to prohibit the use of his or her data for direct marketing.

6. Regular Sources of Data

Data on the data subject is obtained from:

- The data subject or a person authorised by the data subject directly
- The customer's electricity vendor when the vendor submits the necessary information for offering network services when entering into a sale or supply agreement
- Business partners providing services to the Caruna group or third parties, for example, as defect notices or in conjunction with repairing a defect
- Credit institutions in the form of credit ratings when entering into an agreement or during a contractual relationship
- The registers of the Population Register Centre, Suomen Asiakastieto Oy or other registrars offering address, update or other corresponding services
- Authorities, such as the enforcement authorities
- The National Land Survey of Finland

The data will be updated in compliance with the protocols for data transfer on the electricity market drafted by Finnish Energy.

15/11/2018

7. Normal Disclosure of Data

Caruna can transfer personal data in its register to third parties, such as electricity market parties, or disclose it to the authorities only to the extent permitted and required by electricity market and other legislation or with the express consent of the data subject.

Thus, Caruna can transfer data to the extent necessary from its customer register to its business partners providing services. In such cases, the party in question will process personal data on behalf of Caruna and will have entered into an agreement concerning, among other things, the confidentiality of the data.

8. Transfer of Data Out of the EU or European Economic Area

No personal data in Caruna's customer register is transferred out of the EU or EEA. In the event data were to be transferred out of the EU or EEA, this would be separately agreed and the reliability of the processing of personal data would be properly secured through agreements.

9. Register Security Principle

Access to personal data is restricted to persons who need the data in the course of their work.

Access to digital data is restricted through access rights, and the data is further secured for the duration of processing through other technical means, such as encryption, firewalls and other data security measures.

Data in a physical form is kept in locked spaces with restricted access.

10. Right to Access, Objection and Rectification

Under data protection legislation, the data subject has the right to access the information on him or her in the register. The processing of an access request requires that the person in question be identified. Therefore, access requests should primarily be made using the online form at <https://www.caruna.fi/en/legal-notice-and-privacy-policy> or personally at Caruna's headquarters in Espoo. When the request is made at Caruna's headquarters, the identity of the person making the request is verified by means of a valid passport or a photo ID.

If none of the above ways of making the request is feasible, the data subject can print the access request form through a link on Caruna's website (www.caruna.fi) and send it by mail to Caruna Oy, Tietojen tarkastuspyyntö, PL 1, 00068 CARUNA. It can also be sent by e-mail to the address tietosuoja@caruna.fi. A copy of a valid passport or an ID card with a photo must be enclosed with an access request sent by mail or e-mail.

Caruna is entitled to reasonable compensation for providing the data if the data subject requests multiple copies of the personal data in question.

Under data protection legislation, the data subject is entitled to object to the processing and transfer of his or her personal data for direct advertising, distance selling and other direct marketing purposes as well as for market and opinion surveys and for the purposes of registers of people and genealogy by notifying the person at Caruna responsible for register matters of the objection. The right to object does not apply to customer communications, such as communications concerning the development of the contents of services.

15/11/2018

Under data protection legislation, the data subject is entitled to object to the processing of personal data, request the rectification or removal of personal data, request the limitation of the processing of personal data and have his or her personal data transferred from one system to another in the circumstances provided for in data protection legislation. Requests relating to these rights must be made by contacting the person at Caruna responsible for register matters.

If the data subject deems that his or her statutory rights have been violated, the data subject is entitled to contact the Data Protection Authority. The Data Protection Authority's contact information is available at www.tietosuoja.fi.

11. Duration of Storage of Personal Data

Customer data is stored for 10 years after the end of the customer relationship, after which time the data will be deleted during the following calendar year.

Telephone recordings are destroyed no later than 10 years after being recorded.