

**PRIVACY STATEMENT AND FILE DESCRIPTION OF KIERTOKAPULA OY'S CUSTOMER REGISTER**

Personal Data Act (523/1999), Sections 10 and 24

EU General Data Protection Regulation (679/2016), Article 12

Version: 5

Date of inspection: 27 August 2020

<b>1 Controller</b>	Name Kiertokapula Oy
	Address Vankanlähde 7, 13100 Hämeenlinna
	Other contact information (e.g. telephone during office hours, email address) Tel. 075 750 0000
<b>2 Contact person in matters concerning the register</b>	Name Krista Palonen
	Address Kapulasillantie 2, 05880 Hyvinkää
	Other contact information (e.g. telephone during office hours, email address) 075 753 0041, krista.palonen@kiertokapula.fi
<b>3 Name of the register</b>	<b>Kiertokapula Oy's register</b>
<b>4 Purpose of processing personal data</b>	<p>Personal data is used for purposes in accordance with the Personal Data Act, such as</p> <ul style="list-style-type: none"> <li>- customer relationship management and maintenance</li> <li>- customer letters and notices</li> <li>- customer surveys and collection of customer information</li> <li>- implementation, sale, management and invoicing of services provided by Kiertokapula Oy, marketing of own products/services and development of services</li> <li>- opinion polls, market surveys and similar studies commissioned by Kiertokapula Oy related to the company's own operations</li> </ul> <p>The collection of customer data required for emptying waste containers is based on the Waste Act and thus the property's obligation to join organised waste transport.</p> <p>Customer data is collected and stored to ensure the functionality and quality of customer service and to increase the efficiency of waste guidance.</p> <p>The information generated in waste acceptance is based on the requirements of environmental permits.</p>
<b>5 Data content of the register by system</b>	<p>System for waste collection planning, organisation and customer management (Vingo)</p> <ul style="list-style-type: none"> <li>- Customer contact information: name and address information, telephone numbers, email addresses, date of birth</li> <li>- Operational information: emptying address, property address, billing address, electronic invoicing address, marketing address, telephone number, email address, business ID, services (container emptying, rental, washing, etc.), purpose code (terraced house, holiday home, school, etc.), property manager information, contact information, coordinates of waste containers, composting note, start and end date of contract, billing group, customer group, additional written information (e.g. driving instructions, changes agreed with the customer), messages from drivers, notices sent to the</li> </ul>

	<p>customer, notes on telephone conversations as well as changes and measures taken, invoice status information</p> <ul style="list-style-type: none"> <li>- Decisions of the Waste Management Board (office holder), email exchanges with the customer, scanned letters and photographs as well as necessary information on calls are also stored on the customer card</li> <li>- Information related to waste management service changes (container order, emptying interval change, contact information for new customer, composting notifications) from online services as well as address and billing information related to pick-up orders, skip orders, and material orders</li> </ul> <p>System for controlling the emptying of waste containers (TCS)</p> <ul style="list-style-type: none"> <li>- it is possible to enter e.g. the following information about emptying sites into the system: customer name, emptying address, waste container location information, notes made for sites and customers (e.g. car registration numbers)</li> </ul> <p>System for invoicing and debt collection (Ropo Capital)</p> <ul style="list-style-type: none"> <li>- customer data transferred from JHL: customer name and address, customer number, emptying address, invoice details</li> <li>- information related to debt collection activities under the Debt Collection Act (Ropo Capital as controller)</li> </ul> <p>System for the management of waste accepted at a waste treatment site (Scalex)</p> <ul style="list-style-type: none"> <li>- Cash customer data: date and time of transaction, car registration number, municipality where waste was generated, type of waste, weight and price of waste, notes: remarks on previous visits, references requested by the customer for transactions</li> <li>- Invoice customer data: date and time of transaction, car registration number, municipality where waste was generated, type of waste, weight and price of waste, customer contact information (telephone number, address, contact person, business ID), notes: address where waste was generated, information related to invoicing, other information requested for transactions</li> </ul> <p>Reporting system (QlikSense)</p> <ul style="list-style-type: none"> <li>- Data transferred from the Scalex system: date and time of transaction, for invoice customers customer name and customer number, registration number, waste information (quantity, price, type), reception location and notes</li> <li>- Reports are provided to authorities and customers upon request</li> </ul> <p>Email (O365 Outlook)</p> <ul style="list-style-type: none"> <li>- Information accumulated in email correspondence</li> <li>- Questions on waste management sent from the website via the feedback form</li> </ul> <p>Real-time guidance tool on the website (LeadDesk chat)</p> <ul style="list-style-type: none"> <li>- Conversation data from the website (information written by the customer, which may include e.g. name and address), time and duration of the conversation, IP address</li> </ul> <p>Information management system (M-files)</p> <ul style="list-style-type: none"> <li>- Feedback sent from the website</li> <li>- Information on official feedback</li> </ul> <p>Newsletter production system (LianaMailer)</p> <ul style="list-style-type: none"> <li>- Email address, name, possibly other contact information, link to target group (e.g. property manager, teacher)</li> </ul>
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	<p>- Newsletters are sent to everyone and it is possible to unsubscribe from the mailing list. The content of the letters is not marketing, but customer information.</p> <p>Call system (LeadDesk) - Vingo customer number, name, address, telephone number and email address are stored in the customer's data. Calls to customer service numbers are recorded. The storage period for recordings and text messages is 12 months. The retention of emails and text messages cannot yet be determined, but this is on the software supplier's development list.</p> <p>Online shop (Waste web) - verkkokauppa.kiertokapula.fi - Customer data provided in connection with the order: first name, last name, address, telephone number, email, vehicle registration number</p>
<b>6 Regular sources of data</b>	The customer register of the Vingo system is based on the municipal register provided by the waste management authority. Thereafter, and in the case of other systems, personal data concerning data subjects is collected from the data subjects themselves and from the various services used by the data subjects.
<b>7 Data recipients</b>	Kiertokapula Oy's employees whose duties include the processing of customer data.  Data transfer Vingo-Vitec Tietomitta cloud service for customer reporting data and Vingo-TCS for emptying data.
<b>8 Transfer of data outside the EU or EEA</b>	Data is not transferred outside the EU or EEA.
<b>9 Storage period of personal data</b>	The data collected in the register is stored only for as long and to the extent necessary in relation to the original or compatible purposes for which the personal data was collected. Personal data in accordance with this privacy statement is stored for as long as the controller uses the data for the purposes described in section 4. Personal data stored in the register is erased when there is no longer a legal basis for its processing.
<b>10 Principles of register protection</b>	The information security of the register and the confidentiality, integrity and usability of personal data is ensured by appropriate technical and organisational measures.
<b>11 Right to inspection and rectification of data</b>	The data subject has the right to inspect what data concerning him or her is stored in the register. Requests for inspection or rectification can be made by submitting the request to the contact person of the register.
<b>12 Right to erasure of data</b>	The data subject has the right to have the personal data concerning him or her erased without undue delay, provided that <ul style="list-style-type: none"> <li>• the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;</li> <li>• the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing;</li> <li>• the personal data has been unlawfully processed; or</li> </ul>

	<ul style="list-style-type: none"> <li>• the personal data must be erased for compliance with a legal obligation in Union or national law.</li> </ul>
<b>13</b> <b>Right to restriction of processing</b>	<p>The data subject has the right to obtain from the controller restriction of processing if</p> <ul style="list-style-type: none"> <li>• the accuracy of the personal data is contested by the data subject;</li> <li>• the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of its use instead; or</li> <li>• the controller no longer needs the personal data for the purposes of the processing, but it is required by the data subject for the establishment, exercise or defence of legal claims.</li> </ul>
<b>14</b> <b>Right to withdraw consent</b>	<p>The data subject has the right to withdraw consent to the processing at any time, without affecting the lawfulness of processing based on consent before its withdrawal.</p>
<b>15</b> <b>Right to data portability</b>	<p>The data subject has the right to receive the personal data concerning him or her, which he or she has provided to the controller, in a structured, commonly used and machine-readable format and has the right to transmit this data to another controller.</p>
<b>16</b> <b>Right to lodge a complaint with a supervisory authority</b>	<p>The data subject has the right to lodge a complaint with a supervisory authority if the data subject considers that the processing of personal data relating to him or her infringes the applicable data protection regulations.</p>