

Marketing register privacy statement

1. Data controller and contact information	<p>Service Union United PAM (PAM) Siltasaarencatu 18 A, P.O. Box 54, 00530 Helsinki pam(at)pam.fi</p> <p>Contact information of data protection officer: Data Protection Officer Service Union United PAM P.O. Box 54, 00530 Helsinki tietosuojavastaava(at)pam.fi</p>
2. Name of the personal register	Marketing register
3. Criteria for processing right	<p>Legal basis for PAM's personal data processing activities in the marketing register:</p> <ul style="list-style-type: none"> • Customer relationship communications: Legitimate interest (customer relationship management and service delivery) • Marketing communications: Consent (communications sent for marketing purposes) • Social and opinion marketing: Consent (PAM's statistics and surveys)
4. Purposes	<p>The purposes of the marketing register are:</p> <ul style="list-style-type: none"> • Marketing of membership • Marketing of services • Marketing of member benefits • Social and opinion marketing
5. Data content	<p>The following categories of personal data are processed in the marketing register:</p> <ul style="list-style-type: none"> • Member • Customer • Leads and potentials • Resigned members • Decision-makers • Permanent residents of Finland
6. Use of cookies	<p>PAM uses cookies in its online services to provide services and to facilitate use of the services. Cookies and data collected from the online service are also used to analyse and develop the use of the online service and services, to improve usability and ensure data security and for marketing purposes.</p> <p>Users can block the use of cookies in their browser settings. However, cookies are necessary for the functionality of online services, so PAM does not guarantee the functionality of all services if cookie functionality is not enabled.</p>

7. Regular data sources	<p>Personal data in the marketing register is obtained primarily from PAM's membership and customer register.</p> <p>PAM maintains data quality by updating personal data from information services such as the Posti address information service.</p>
8. Recipients or groups of recipients	<p>Personal data is not disclosed to third parties.</p> <p>Personal data is not transferred or disclosed outside the EU or EEA areas.</p>
9. Automatic decision-making	<p>No automated decisions within the meaning of the EU General Data Protection Regulation are made in the activities of PAM Union.</p>
10. Right of verification	<p>Data subjects can verify what information about them is stored in PAM's membership and customer register. In their verification request, data subjects must provide sufficient identification information about themselves. Verification requests must be submitted signed electronically or in writing to PAM Union's data protection officer.</p>
11. Portability of personal data	<p>Data subjects may request from PAM, as a data file, personal data on them that they have provided to PAM on the basis of a contract or their consent. At the request of the data subject, PAM may also transfer the data concerned to another controller who is able to receive the personal data concerned in a secure manner. In the verification request, the data subject must provide sufficient identification information about him/herself. The request must be submitted signed electronically or in writing to the PAM Union data protection officer.</p>
12. Right to rectification of data	<p>Data subjects may request PAM to rectify and complete inaccurate or incomplete data using a rectification request signed electronically or in writing. In the request, the data subject must provide sufficient identification data about him/herself and describe the data to be rectified.</p> <p>The rectification request must be sent signed electronically or in writing to the PAM Union data protection officer.</p>
13. Right to limitation	<p>Data subjects may request PAM to limit the processing of their personal data in accordance with Article 18 of the EU General Data Protection Regulation. In the request, the data subject must provide sufficient identification information about him/herself and specify the data to be limited. The limitation request must be submitted signed electronically or in writing to the PAM Union data protection officer.</p>
14. Consents and prohibitions on direct marketing (right to object)	<p>Data subjects may provide PAM with consents and prohibitions in relation to direct marketing and research surveys as follows:</p> <p>Consents:</p> <ul style="list-style-type: none"> • e-mail direct marketing • mobile message direct marketing <p>Prohibitions:</p> <ul style="list-style-type: none"> • direct marketing by postal address • telephone marketing • survey requests by mail or telephone <p>Information on the use of cookies is provided on PAM's website and consent is asked when accessing the website.</p> <p>Users of the online service can deny the cookies necessary for production of the online service in their browser settings. In that case, however, the functionality of online services cannot be guaranteed.</p> <p>Prohibitions and consents do not apply to member communications that do not</p>



	include marketing.
15. Retention periods and destruction of personal data	<p>Members' personal data is retained for ten (10) years from the end of membership. Personal data of deceased persons is kept for six (6) years from the date of death.</p> <p>In dispute cases, the retention period of ten (10) years from the end of membership is applied, unless there is an earlier legal obligation to delete any information.</p> <p>For training and event data, event data is deleted when the need for processing and use expires.</p>
16. Register protection principles	<p>PAM ensures the security of personal data through comprehensive technical, physical and administrative safeguards. Personal data may only be processed by authorised persons. Data integrity and reliability are ensured and data is available for its ended purpose when needed. Implementation of data security is ensured from the design of the processing of personal data at all stages of the personal data processing lifecycle, up to the secure destruction of the data. PAM ensures, through comprehensive agreements and guidelines and adequate controls, the secure processing of personal data also by those acting on PAM's behalf.</p>
17. Right of appeal to the supervisory authority	<p>Data subjects have the right to lodge a complaint about processing operations they consider unlawful with the <i>Data Protection Authority</i>. More information on how to exercise the right to appeal at www.tietosuoja.fi.</p>