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Privacy Policy of Member and Stakeholder Register

1. Data controller

The Personal Data Register Controller is Green Building Council Finland ry ("FIGBC").

Business ID: 2367766-3

Visiting address: Lapinrinne 3, 00100 Helsinki

Point of contact: Association Manager Arto Bäckström

Phone: +35840 5242402

Email: arto.backstrom@figbc.fi

2. Purpose of personal data processing

The following data collected from FIGBC's member organisations, partners, and other stakeholders ("Data Subject") is processed and utilised for purposes mentioned in this document:

Data	Member organisation's contact person	Contact persons of potential member organisations and stakeholders	Newsletter subscribers	Participants at events and visits	Participants in projects or other activities
Name	x	x	x	x	x
Position/tasks at the company	x	x	x	x	x
Company	x	x	x	x	x
Telephone number	x	x		x	x
Email	x	x	x	x	x
Invoicing details	x			x	x
Details concerning participation in events/meetings	x	x	x	x	x
Company contact details	x	x		x	x
Field of operations	x	x			
Honorary positions	x				
Details concerning communications	x	x		x	x

The processed data does not include special categories of personal data, except for details concerning the technical arrangements of events/visits (such as chosen meal

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and allergies), which are collected separately.

Regular sources of information

- Information concerning the member organisation's contact persons shall be collected from the persons themselves in connection with the membership process or with updating the existing information. In addition, information is collected from representatives of the member organisation through other communications and from public registers.
- Information concerning the contact persons of potential members or stakeholders shall be collected from the persons themselves in connection with meeting or otherwise contacting them, and from public sources commonly available, such as websites.
 - Information of participants in projects, events, and other activities shall be collected from the persons themselves separately for each event in conjunction with e.g. signing-up.
 - Information concerning newsletter subscribers shall be collected through the subscription form filled out by the person themselves. The data may also be received from other contact persons of the organisation.

3. Purpose of personal data processing

Personal data is processed and utilised for FIGBC's general operations, for maintaining a membership register, and for marketing and other communications. Personal data is also processed for communications, marketing, and cooperation regarding stakeholders and other partners, evaluation of FIGBC's activities, and further developing the building and construction sector.

The data shall not be used for automated data processing or profiling.

Data utilised for	Member organisation's contact person	Contact persons of potential member organisations and stakeholders	Newsletter subscribers	Participants at events and visits	Participants in projects or other activities
Maintaining a membership register	x				
Maintaining a register of Committees or other honorary positions	x				
Invoicing	x			x	x
Events and visits	x		x	x	
Communications and marketing	x	x	x	x	x
Project registers					x
Research and development	x	x	x	x	x

4. Legal basis for processing personal data

In this register, the grounds for processing personal data are legitimate interest, contract, obligations based on law, and the consent of the data subjects.

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A legitimate interest or agreement arises in situations where the Data Subject registers or participates in an activity or event or acts as a representative of a organisation relevant to FIGBC or is otherwise linked to FIGBC through activity or cooperation. The legal obligation is the processing of personal data in invoicing matters and travel and expense reimbursement matters in accordance with the Finnish Accounting Act.

The contact information of the newsletter subscribers is obtained on the basis of the consent given during event registration or on the basis of other separate consent.

5. Personal data retention period

FIGBC shall erase data concerning a person from the register once a year if there are no active measures or pending matters in relation to a person. This data includes for example ended memberships, ended projects, and past events.

Newsletter subscriber data is erased from the register within a month of a written erasure request.

In case data is required to be stored for purposes indicated in legislature or for other compelling grounds, such as accounting requirements, the data is erased immediately after there are no grounds for storing it.

Without limitations from the aforementioned retentions, data may be stored longer for historical and statistical purposes related to FIGBC's operations and for written expression.

6. Disclosure or personal data

Information may be disclosed and published as follows:

- Lists of participants in projects or events may be shared with the participants of the projects and events in question.
- Compositions of FIGBC's Committees and other honorary positions are public and may be published on FIGBC's website.

The data stored in registers shall not be disclosed for commercial, sales, polling, or market study purposes. However, personal data can be disclosed to the authorities in accordance with Finnish laws upon request. The Data Controller will not transfer data outside of the European Union or the European Economic Area.

The data is processed by FIGBC's personnel. In addition, the data is also processed in the software and servers of Microsoft and CRM-service Oy. The Microsoft servers may be located outside the European Union. Microsoft software is managed by FIGBC's IT service provider Tahto Group Oy, which also has access to all data processed in FIGBC's Microsoft environment.

Regarding travel and expense invoices, information is also forwarded to FIGBC's accounting office for processing. All processors are committed in their terms of use to comply with the regulations of the EU data protection regulation.

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FIGBC may also partially outsource the processing of personal data to another third party. FIGBC always guarantees through contractual arrangements that personal data is processed in accordance with valid data protection legislation and FIGBC's regulations, and otherwise appropriately.

7. Principles for protecting the register

Data is mainly processed with CRM software, the technical data security of which is handled by CRM-service Oy. CRM-service Oy data is always physically located in top-level data centers in Finland, where data is kept protected against both man-made and natural threats.

The security of the system and services is ensured by firewalls, IAM, etc. All data is backed up daily to another data center and is kept for 30 days. Data is transferred over encrypted connections. Logging into the CRM requires personal credentials and data processing can be monitored using log data.

In the Microsoft 365 environment, the processing of personal data is protected and access to the data requires a personal username and password. Technical protection is taken care of with Microsoft's own data security features and by keeping the device base and software updated.

FIGBC personnel who process personal data have received training on the requirements for data processing.

Customer data processed in paper form is processed carefully and in accordance with good data processing practices. The data is securely disposed of after use.

8. Data subject's rights

Regarding the processing of their data, every Data Subject has

- inspection right, i.e. the right to check the personal data stored in the register. If there are errors or omissions in the data, the Data Subject can request that the data be corrected or supplemented.
- the right to object, i.e. the right to object to the processing of their personal data, if the Data Subject feels that the personal data has been processed unlawfully or without the appropriate right.
- the right to erasure, i.e. the right to request the erasure of data stored in the register. The Data Subject also has the right to restrict data processing.
- data transfer right, i.e. the right to transfer data from one system to another.
- the right to appeal, i.e. the right to file a complaint with the data protection commissioner, if the Data Subject feels that valid data protection legislation has been violated in the processing of personal data.

The Data Controller can refuse to implement a request for objection or erasure only on the basis of the law. If the Data Controller does not agree to the Data Subject's requirements, the Data Subject has the right to file a complaint with the data protection commissioner. The Data Subject also has the right to demand that the processing of disputed data be limited until the matter is resolved.

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9. Contact

All contacts and requests for information regarding this policy and the register must be made personally in writing to the contact person named in item one (1). FIGBC can disclose personal data from the register only to Data Subjects whose identity we can verify.