

Privacy policy

This is the Privacy Statement of Finlandia Hotels (Suomen Mukavat Hotellit Oy). We are complying with the Finnish Personal Data Act (10 and 24 §) and EU General Data Protection Regulation. Finlandia Hotels respects your privacy. In our Privacy Statement, we explain why, how and when we process your personal data. We also outline your rights to privacy and our commitment to protect your personal data. Written on 16.5.2018. Last changes on 17.5.2018.

1. Register controller

Finlandia Hotels, Pohjolankatu 38, FI-00600 Helsinki
Phone number: +358 (0)9 684 1440, e-mail: sales@finlandiahotels.fi

2. Register contact person

Susan Aaltonen, tel. +358 (0)9 684 1440, e-mail: sales@finlandiahotels.fi

3. Register name

Finlandia Hotels' Customer Loyalty Register

4. Legal basis and purpose of processing personal data

The legal basis for processing personal data in accordance with the EU's general data protection regulation is the legitimate interest of Finlandia Hotels. The purpose of the processing of the personal data is to maintain the general information of loyalty customers and the information related to their interests that customers have given to Finlandia Hotels for their use with their consent.

You have the right at any time and without charge to prohibit Finlandia Hotels from processing your personal data for marketing purposes or withdraw your consent. You can use this right by contacting Finlandia Hotels' main office, contact information is under point 10.

The register is based on a legitimate interest and it includes purchasing information and bonuses on Finlandia Hotels bonus card holders and their contact information for more personalized advertising and customer service. The register content is exclusively to Finlandia Hotels. Personal data is kept in separate registry tables, in cumulative bonus point tables only the bonus card number is used as identification. The technical management of the register is carried out by Solteq Oyj, on whose server the customer loyalty software is running and where information about the use of bonus cards is saved.

Information is not used for automated decision making or profiling.

5. Data content of the register

General information on Finlandia Hotels bonus card holders: customer type (personal bonus card holder/corporate bonus card holder), bonus card commissioning date, surname, first names, postal address, zip code, city, country, mobile phone number, e-mail, date of birth, title/occupation, interests (cultural tourism, spas, golf, family tourism, food & wine, other sports). Corporate bonus card holder data includes contact details of the company, contact person, bank details and business ID.

Card information: card number, expiration date, card commissioning date, card type.

Bonus customer marketing information: marketing campaigns to which customer has attended.

Information on the use of Finlandia Hotels bonus card: purchases made on the card including the place of purchase, date of purchase, type of product/service, amount of purchase, cumulative purchases, accumulated bonus, used bonus, accumulated restaurant coupon bonus, annual customer bonuses (corporate customers).

The information is kept only for as long as necessary. Bonus card application forms filled in by customers are scanned and saved to a protected (with username and password) intranet, from which the Finlandia Hotels' central office prints the forms and saves the information in the customer loyalty register. The forms are then archived to a locked place for one year, after which they will be destroyed. Electronic versions of the forms are deleted immediately after printing.

The electronic customer information in the register are kept for three years, after which the data will be deleted if the customer has not made any purchases in Finlandia Hotels' hotels.

6. Regular sources of information

Customers' general information and interests from the card application form submitted by the customer and notifications made to the controller by the customer during the customer relationship are saved in the register.

If the customer wants to prevent their personal data being processed for direct marketing, Finlandia Hotels comply without any exceptions, no information will be passed on to direct marketing. Prohibition on Finlandia Hotels customer newsletters and bonus information will be saved on a separate notice from the customer. Information on the use of Finlandia Hotels bonus card (card information, purchase data, bonus usage data) can be obtained from Smart Bonus Client system, which is used by Finlandia Hotels hotel personnel. The information on the bonus account and customer information comes from Finlandia Hotels customer loyalty system.

7. Personal data sharing and transferring outside EU or EEA

Finlandia Hotels do not share personal data with third parties. Personal data will not be transferred to a country or territory outside the EU or EEA (European Economic Area).

8. Data protection principles

Finlandia Hotels and Solteq Oyj, which manages the system, strictly enforce confidentiality. Information about a single customer is disclosed only on the basis of a statutory duty to notify, for example a customer's own or a law-based request.

A. Manually saved data

Bonus card application forms filled in by customers are scanned and saved to a protected (with user name and password) intranet, from which the Finlandia Hotels' central office prints the forms and saves the information in the customer loyalty register. The forms are then archived to a locked place for one year, after which they will be destroyed. Electronic versions of the forms are deleted immediately after printing.

B. Electronic data

Only certain employees of Finlandia Hotels and processors who work for Finlandia Hotels are entitled to use the customer loyalty system; to view and process registry information. The database has different user levels, so the user is only allowed to process or view the information needed for their use. Each customer register user has its own username and password. The register is protected by Solteq Oyj's firewall, which protects the system from external contacts. For security reasons, the hotels of Finlandia Hotels do not have full access to register. They have limited access to browse individual customer's general information and accumulated purchases and bonuses upon request from the customer. The hotels of Finlandia Hotels cannot view the whole purchase history of an individual customer, nor the entries of other hotel units even if the customer so requests. Customers are able to view their personal data by signing up to the Finlandia Hotel Bonus Club.

The electronic customer information in the register will be kept for three years, after which the data will be deleted if the customer has not made any purchases in Finlandia Hotels' hotels.

9. Right of access to your own personal data and right to rectification

Every customer in the register has the right to check his/her personal data stored in the register and to demand that any incorrect information will be corrected or incomplete information will be supplemented. If a customer wishes to check the information stored or to request correction, the request should be sent in writing to the controller of the register: sales@finlandiahotels.fi or Finlandia Hotels, Pohjolankatu 38, FI-00600 Helsinki. The controller of the register may request the customer to prove his/her identity if necessary. The controller of the register has to answer the customer within the time limit set in the EU General Data Protection Regulation (usually within one month).

10. Other rights related to processing of personal data

Each individual in the register has the right to erasure ("right to be forgotten"). Customers have also other rights under the [EU General Data Protection Regulation](#) such as restricting the processing of personal data in certain situations. Requests should be sent in writing to the controller of the register: sales@finlandiahotels.fi or Finlandia Hotels, Pohjolankatu 38, FI-00600 Helsinki. The request can also be made personally at the office of the register controller. The controller of the register may ask the customer to specify in sufficient detail what information or processing actions the request concerns.

In order to ensure that personal data are not disclosed to any other person than the data subject, the controller may ask the customer to submit a signed request. The controller may also request the customer to prove his/her identity with an official ID or with other reliable means. The controller of the register has to answer the customer within the time limit set in the EU General Data Protection Regulation (usually within one month).