

Data handling practices of the Foundation for a Living Baltic Sea (further – “Foundation”)

(as of September 9th 2023)

Privacy statement

Personal data registers and the administration of those

1. The collected data and its use

Collection of personal data

The Foundation gathers the following information from its interest groups / external persons of the Foundation:

- First and last names
- Title
- Company / organization / association / and department names
- Contact details
- Communications between the person and the Foundation, customer history
- Subscription status (eg. unsubscription for Newsletters, emails)
- Other optional information provided during communications

If the person contacts the Foundation by email or on the phone, the Foundation might handle the following personal data:

- First and last names
- Title
- Company / organization / association / and department names
- Contact details
- Communications between the person and the Foundation, customer history
- Subscription status (eg. unsubscription for Newsletters, emails)
- Other optional information provided during communications



From all the users of the following webpages: www.bsag.fi, www.carbonaction.org, www.uudistavaviljely.fi, www.joululahjaitamerelle.fi, www.itamerikoulu.fi, www.balticsumanu.eu, www.balticslurry.eu, www.elavaitameri.fi, the Foundation might gather technical information, such as analytical information (Google Analytics).

In order for the information to be accurate, the Foundation may update personal data by utilizing official registers, statistics or updating services.

Grounds for processing of personal data and purposes for processing

The Foundation processes personal data in order to pursue a legitimate interest. The legitimate interest is based on activities, mentioned in the Foundation's rules: enhancement of business to business and user experience, direct marketing activities in order to fund the activities. The Foundation does not, however, use personal data for direct marketing purposes without an explicit consent.

The Foundation handles personal data, based on the following personal data registers.

The Foundation stores personal data for only as long as it takes to fulfill this privacy statement, and in order to adhere to other mandatory legislations such as accountancy legislation. Storage time is also affected by the context and purpose of the gathering of the said data.

The personal data and company data registers of the Foundation:

- 1) **Personal data, related to recruitment and job applications**
- 2) **Personal data registers and company registers, related to fundraising:**
 - a) Christmas and Summer campaigns
 - b) "Day job" (Päivätyökeräys) and "Baltic Sea walk" (Itämeri-kävely) campaigns of schools
 - c) Commemoration day campaigns
 - d) Last wills of individuals
 - e) Other campaigns
- 3) **Registers, pertaining to invitations for different events**
- 4) **Commitments Bank**
- 5) **Registers, pertaining to information along with current projects of the Foundations.**
Please see the list of the projects at BSAG's webpage www.bsag.fi
- 6) **Registers for sending newsletters of the Foundation**



2. Storage of personal and company data registers

2.1. Personal data, related to recruitment and job applications

As part of the Foundation's recruitment, job applicants send their CVs to the Foundation. Also, in other cases potential job applicants send their CVs to the Foundation. Some of these CVs the Foundation keeps for upcoming possibilities. The CVs are stored as part of online data storage of the Managing Director or other human resource manager, and can be accessed only with their personal username and password.

2.2. Personal data registers and company registers related to fundraising

In order to support its activities, the Foundation collects funds based on a collection license by the Police Administration. Donations come from private persons, companies, Foundations, associations and other organizations. In order to have an effective fundraising and the maintenance of the same and development of the same, the Foundation has a register of donors.

The Foundation also maintains and stores companies and personal data registers for the following fundraising purposes:

- a) Christmas and Summer campaigns
- b) "Day job" (Päivätyökeräys) and "Baltic Sea walk" (Itämeri-kävely) campaigns of schools
- c) Commemoration day campaigns
- d) Last wills of individuals
- e) Other campaigns, for example "summer campaigns".

The Foundation stores the registers on its own online data storage, protected by the personal usernames and a 2-step passwords verification of the Foundation's employees. Some of the information of the donor register is obtained from MicroMedia Oy (info@micromedia.fi). The Foundation also stores this data on its online data storage, protected by the personal usernames and a 2-step passwords verification of the Foundation's employees.

2.3. Registers, pertaining to invitations for different events

The Foundation organizes often events for different interest groups or other events. For these events, the Foundation gathers and maintains company registers and personal data registers. These might partly be the same as the above-mentioned registers for fundraising purposes. For new events, the Foundation assembles new registers. The Foundation keeps these registers in its online data storage, protected by means of the personal usernames and a 2-step passwords verification of the employees of the Foundation.



2.4. Commitment Bank

The Baltic Sea Commitment is BSAG's tool for committing various actors - companies, states and other organizations to support the well-being of the Baltic Sea with their own expertise. All Baltic Sea Commitments can be found in the [Commitment Bank](#). In order to publish a new Commitment and add it to the Commitment bank, the Foundation collects contact details of the person, responsible for the commitment / marketing. The Foundation keeps these registers in its online data storage, protected by means of the personal usernames and a 2-step passwords verification of the employees of the Foundation.

2.5. Registers for sending newsletters of the Foundation

The Foundation sends regularly different types of newsletters to its interest groups. For these newsletters, the Foundation gathers and maintains company registers and personal data registers. These might be partly the same as the above-mentioned registers for fundraising purposes and invitation registers. The Foundation keeps these registers in its online data storage protected by the personal usernames and a 2-step passwords verification of the employees of the Foundation.

3. Collection of data and transfer of the same

The Foundation might transfer interest groups' information (such as name, email, date of birth, phone number) for example, to the invitation and announcement system of the event organizing party.

The recipient of personal data is in these cases the authorized service provider of the Foundation. The authorized service provider handles the personal data transferred by the Foundation in order to offer brand services to the Foundation.

Should the personal data be transferred outside the EU/ETA zone, the Foundation makes sure that the transfer is governed by appropriate measures based on an agreement (for instance by using the standard contract form by the European Commission) and that the transfer is based on a proper legal ground and that the handling of the data and nondisclosure fulfills the requirements of applicable laws.

The Foundation does not transfer personal data unless:

- the person has provided his/her consent;
- the transfer is based on law; or



- the transfer is based on a service provider and the handling of personal data is agreed upon with the said service provider.

Erasing of data

A person can at any time unsubscribe him or herself from an email mailing list or forbid electronic communication. The Foundation erases this data as soon as possible after receiving the notification of erasure.

Regarding the abovementioned personal data registers, the Data Protection Ombudsman's recommendations are applied.

In other cases, personal data is stored as long as is necessary in order to defend a legal claim or to comply with bookkeeping or other legal obligations.

Despite a notification of erasure of data, the Foundation keeps personal data should there be a justified reason such as a legal obligation.

4. The rights of a person

The right to receive information about data processing

A person has a right to know, which data, relating to him or her, is processed by the Foundation.

In addition, a person may require the Foundation to report regarding the following matters:

- Why data is processed
- To whom the Foundation has disclosed data or to whom the Foundation plans to disclose such data
- For how long the Foundation stores the data in question. If it is not possible to communicate the accurate storage time, the Foundation will inform the person about the criteria for defining the storage time, such criteria may be based for instance on a certain law or industry specific instruction.

The right to rectify data

If the data relating to a person is incorrect, the person has a right to require rectification of such data.

The person may ask the Foundation to rectify the data by contacting the Foundation, the contact details of which are provided in the section 5 of this privacy statement and on our webpage at www.bsag.fi.

The right to object a limitation of data processing



A person has the right to object the processing of data or profiling, when the data is used for direct marketing. A person has a right to require the limitation of processing his/her personal data, for instance when the data relating to that person is incorrect.

In addition, a person has, in certain special circumstances, the right to object the processing of his or her personal data, based on a personal particular situation.

A person may invoke his/her right to objection and restriction of data processing, by contacting the Foundation, the contact details of which are provided in the section 5 of this privacy statement and on our webpage at www.bsag.fi.

The right to lodge a complaint

A person has a right to lodge a complaint with the competent national supervisor authority, if he/she finds the personal data processing activities of the Foundation to be non-compliant with data protection legislation.

5. Contact details

Data controller: Elävä Itämeri säätiö s.r. (Foundation for a Living Baltic Sea) (2177822-5), Keilaranta 5, 02150, Espoo, www.bsag.fi.

Responsible person:

Managing Director **Ville Wahlberg**

Email: ville.wahlberg@bsag.fi

Telephone: +358 45 125 1322

Should a person have a request, notification or other questions relating to the handling of personal data, the person may contact the Managing Director of the Foundation.

