

**Sivistyskiihdyttämö ry**

**(“Dare to Learn”)**

# Privacy Policy v 2.2

We at Sivistyskiihdyttämö ry (“Dare to Learn”) collect personal data of users of our services, potential and actual partners and stakeholders, and event participants in order to provide our services. We process all personal data with care and in compliance with all applicable regulation. We aim for maximal transparency. This Privacy Policy states what data we collect, process, for what purposes and what are the Registered Persons rights regarding this data procession.

## File Controller

Sivistyskiihdyttämö ry (Business ID: 2793405-7), “Dare to Learn”  
Lapinrinne 2, 00180 Helsinki, Finland  
info@daretolearn.fi

## Contact person

Henna Pursiainen  
Lapinrinne 2, 00180 Helsinki, Finland  
henna.pursiainen@daretolearn.fi, +358 50 3667892

## Purposes of procession

We only process data when there is a legitimate purpose for the procession. These purposes may be:

1. To implement a contract signed between the File Controller and the Registered Person, for example when buying the ticket or signing a contract of partnership.
2. Prior consent of the registered person given for example when the use of our services has started, subscribing the newsletter, or when a proposal of program has been submitted.
3. To ensure fulfilment of a legitimate interest of informing the Registered Persons (key stakeholders and media representatives) about current activities of the File Controller, of conducting background research, aiming to signing a contract between the Registered Persons and File Controller, or of reaching out

to potentially interested partner organizations or event participants.

## Ending of storage period

We only store the processed data for relevant period of time. Depending on the purpose of the procession, data storage period might end:

1. When the relevant post-communication period of each event has ended. The register will be stored for archiving and research purposes.
2. When the Registered Person no longer represents potential or current stakeholder group or has opted out.
3. When the Registered Person opts-out, or when a form of communication is no longer in use by File Controller.
4. End of the calendar year.
5. Accounting material is stored according to the legislation regarding accounting

## Groups of persons, data content, and personal data groups of the register

Groups of persons whose personal data can be processed include participants of, and performers and speakers in events organized by the File Controller or persons who have consented to marketing measures or consented to data processing when submitting application as volunteer or a proposal for event program. In addition, personal data of groups of people who are potential stakeholders, media representatives, potential partners or potential participants of events organized by File Controller.

The personal data that can be processed within the register include the first and last names and any contact details of the Registered Person, and any necessary information provided relating to the event. In addition, information processed can contain an email address, telephone number, street address, date of birth, professional background and status, location when using digital services, payment details, other personal data the Registered Person provides, including pictures, for example when creating a profile or information of allergies.

## Regular sources of information

Information provided by the participant, applicant or contributor, customer information, stakeholder information, background research and invoicing database.

## Regular disclosure of information

Information contained in the register can be distributed within the organization and between the interest groups of the event. In addition, information contained in the

register will be forwarded to the named personal data processor.

## Transfer to countries outside European Union

File Controller may transfer Registered Persons personal data to countries outside the European Union (EU) and the European Economic Area (EEA) for data procession purposes. Control over personal data files will never be transferred. Data will be only transferred to countries that have been determined as having adequate level of data protection, or to the United States of America (US) which has signed the Privacy Shield decision with the EU. In the US, only data processors that participate in the Privacy Shield list of organizations.

## Data security principles

Data will be stored in a technically secure location, processed only by parties who comply to applying regulation. Physical access to the data is prevented by means of access control and other security measures. Access to the data requires sufficient rights and multi-phase identification. Data contained in the register can only be accessed by the File Controller and separately named technical persons of data processors. Only the named persons have the right to process and maintain information contained in the registers. The users are bound by confidentiality obligation. Back-ups are made of the data contained in the register in a secure manner and the data can be restored where needed. The level of information security is audited regularly through either external or internal audits. Personnel who have access to the personal data are regularly trained and informed about data security principles and practices.

## The rights of the Registered Persons

The right of the Registered Persons include:

- The right to request from the File Controller access to his or her personal data and the right to request that any error in the said data be corrected or removed or its processing be restricted, and to oppose to the processing or transferring of the said data from one system to another;
- The right to view and, where required, to correct the personal data stored in the register; all requests must be submitted to the File Controller in writing. The Registered Persons have the right to require that any incorrect personal data saved in the register be corrected.
- To the extent that the processing of the personal data is based on the consent of the Registered Person, the Registered Person has the right to cancel this consent at any time without this cancellation having any effect on the legality of processing completed before the said cancellation.
- The right to submit claims to the supervisory authority on the processing of personal data.