

Notification practices

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Privacy statement and customer file description

We process your data following the Personal Data Act/ 22.4.1999/523 and EU's General Data Protecting Regulation EU) 2016/680. We collect and use your personal data to produce and offer services.

The processing of customer data is based on material connection, which is the contract you have made; the data obtained during the use of the services and registration; and your consent.

We can also process your data on other grounds for example, on your order or based on an order of law or by taking advantage of the public address registers of Itella and the Population registration office (Väestökisterikeskus) or other public databases.

For what purpose and how we collect and process your personal data

We use your personal data for sales of supplied water, and the documentation relating to the reception of waste water and the control of rainwaters. All the customer feedback sent to us is documented. This means that we collect your personal data to maintain the whole life cycle of the customer relationship as well as the development of the customer relationship. We use your data for example to invoice of the services we provided, customer communications and we can send you information about our pricing and changes in our operations as well as disturbances and breaks in the distribution of water or waste waters. The methods of customer communications are paper documents, emails and text messages.

Where is the data regularly collected from

We mainly receive your data directly from you. The data might be identified or derived from the use of services. Additionally, we might acquire data from the official's databases, for example, credit history register, customer default register or phone number register:

- Public address services of Itella and Väestökisterikeskus
- Phone number registers
- Personal information maintained by Väestökisterikeskus and the local magistrate.
- Credit history registers from Suomen Asiakastieto Oy to the extent permitted by law
- The data can be transferred outside the EU and ETA to the extent permitted by the Personal Data Act

Who processes your personal data

In Kymen Vesi, only those, who need your data to do the work or service ordered by you or to maintain your customer relationship when you contact us, process your data. In addition, those service providers to whom Kymen Vesi has outsourced some function, as well as the workers who participate in the outsourced service.

What kind of data do we collect about you

Your personal data is collected from you when you make a joining agreement or user agreement when becoming our client; when you buy or use our services or products; during marketing campaigns and research; and in other situations when you deal with us. We only collect the data about you that is relevant to the use of the product or service in question. You give us information, for example, when you change your personal information in the electronic services or by participating in questioners and campaigns or by answering questions as part of the services we provide. In electronically signed water contracts, we receive personal identification information with the xml file.

We also receive data by observing how you use our services. The customer feedback you give is documented so that we can fix the problems you notice.

Collected data includes for example:

- Data related to the identification and recognising of an individual: name and national identity number.
- Contact information: address, email address and phone number.
- Different data relating to the client relationship and its management.
- Data relating to the requirements of fulfilling legal obligations.
- Data relating to the use of products and services, e.g. online invoicing address.

How do we use cookies

We use cookies to offer and develop our services e.g. to analyse the operations of our website. When you use your electronic services e.g. your IP-address is saved on the website's memory. Our websites and services may also include cookies by third parties.

Where is the data regularly transferred to

We transfer your information in the context to the extent permitted by law within the company as well as to our partners for customer services, management of the customer relationship and marketing, When joining the network, the data is submitted to those parties who need it in order to generate a joining process, e.g. planners and contractors. We use subcontractors to produce the services and give personal data to, e.g., collection agencies, for printing services, to the authorities to fulfil legal obligations (e.g. debt recovery official and social authorities).

Your rights as our customer

You have the right to check your data and to demand the rectification of inaccurate personal data and to have incomplete personal data completed, as well as the erasure of the data in the register that is irrelevant for the purpose or out of date. You also have the right to prohibit the use of your data in direct marketing as well as marketing research and surveys by contacting the customer service of Kymen Vesi Oy or, in the future, by changing the setting in the electronic services.

The principles of the protection of the database:

We protect your data by using the adequate data protection and information security measures, e.g. risk assessments, prevention, firewall, encryption technology and by using safe IT areas, access control and security systems, access rights and monitoring, and by training the staff participating in personal data processing as well as carefully selecting the cooperating partners who take care of outsourced operations.

Personal data breaches

If, despite the measures taken by us, you become a victim of a data breach we inform about the breaches and act according to the laws and regulations.

How long do we keep your data:

We keep your data during the whole duration of the customer relationship. After the termination of the relationship, the data retention period depends on the data and its use, e.g. on the legal obligations to preserve information.

We aim to ensure that our database is accurate and up to date by erasing the unnecessary information when possible and updating information that is out of date. We also ask you to take care of updating your customer relationship information.

You can send your questions about data protection and your customer data to: [info\(a\)kymenvesi.fi](mailto:info(a)kymenvesi.fi)

File descriptions

A file description in accordance with the Personal Data Act 10 §
Kymen Vesi Oy's customer files

Registrar:

Kymen Vesi Oy, customer service, tel. (05) 234 8111
[laskutus\(a\)kymenvesi.fi](mailto:laskutus(a)kymenvesi.fi) and [info\(a\)kymenvesi.fi](mailto:info(a)kymenvesi.fi)

The purpose of processing personal data:

Customer service, customer notifications, managing customer relationship and producing services, taking care of the obligations of storing, reporting and responding to enquiries in accordance with the legal guidance and instructions by the authorities, direct marketing

The information content of the files

Customer information: basic information, service information, billing information, debt recovery information

- First name and surname
- National identity number
- Address information
- Contact phone number
- Phone number for notifications
- Contact email address
- Nationality, contacting language
- Prohibitions and consents for direct marketing
- The name and address details of a possible second user
- Additional information given by the customer
- Customer history (e.g. contacts with the customer/from the customer, changes in services)

- Service delivery information and information about the contract (destination, delivery date, connections, other services)
- The start and finishing dates of the customer relationship
- Information relating to invoicing and debt recovery
- Information for distribution and about the contact person
- Invoicing information, arrangements with creditors, debt recovery, bankruptcy, date of death
- Other information significant for the management of the customer relationship

The principles of storing personal data

Kymen Vesi Oy keeps your personal data in the files for as long as the company's functional necessities, archiving regulations, other obligations binding the company and the Accounting Law require it. The data is kept permanently if its deletion led into the loss of information relevant for the real-estate.

Permanently stored data

The following data is kept permanently in order to secure the permanent unity of the real-estate database in the archives, information systems and/or network disks.

- The joining agreements and its attachments and the personal information they contain
- Joining statement applications and statements, joining cost calculations and the personal information they contain
- Exemption applications and statements and decisions and the personal information they contain
- The placements permit from the land owners and the personal information they contain
- Emails saved in a PDF-format insofar as they relate to information that is relevant to save for the real-estate

As part of the system development, we are investigating the possibility of anonymization of the personal information.

Data stored for 10 years

For other parts the personal data is stored for 10 years after the termination of the contract in order to assure the legal protection of the customer and the company (The general delivery terms of Kymen Vesi Oy, section 6.3)

The data stored for 10 years after the year of the occurrence are:

- Invoicing archives, material concerning the invoicing for jobs
- Material concerning the payments
- Material concerning debt recovery
- The lists for closing water connections
- Other similar documents, such as payment orders and other accounting material related to them, declarations of damage, customer feedback and other contacts from the customers.

Data stored for a shorter period

Shorter data retention times are followed with, e.g., the following personal data:

- The data collected by the camera systems of the establishments is kept for 30 days
- The data that is needed for a temporary purpose is deleted within a reasonable time after the need has ended (such as lists for changing water meters, mailing lists for customer letters, event participant lists)
- The data, which is collected by web forms, are removed twice a year, June and December. At the time of removal, all forms older than 90 days will be deleted.