

## Customer data processing, accommodation of private customers

In this privacy policy we explain how we process personal data. With this policy, we inform the data subject (hereinafter referred to as You) about how we process your personal data, what rights you have and how you can exercise your rights. The content of the statement, the rights of the data subject, etc. is laid down in the EU General Data Protection Regulation 2016/679.

The processing of personal data refers to activities that are directed at a natural person, e.g. Your personal data or sets of personal data. The processing of personal data can take place in information systems or manually, for example on paper or by conversation. The processing of personal data includes, among other things, the collection, recording, organisation, storage, modification, transfer, combination, disclosure, publication of data, as well as the deletion and destruction of data.

### 1. Data controller and data protection officer

**Name and address of the controller:**

Rovaniemen koulutuskuntayhtymä REDU  
Korvanranta 50  
FI-96300 Rovaniemi

**Data protection officer of the controller**

In questions concerning data protection and this processing activity, please primarily contact the contact person of the register presented in section 2.

If necessary, you can also contact REDU's Data Protection Officer. His name and contact information can be found on the page <https://redu.fi/dataprotection>.

### 2. Responsible company of the data processing

Santasport Finland Oy  
Hiihtomajantien toimintayksikkö

**Accountable manager**

Managing Director	Salmela Ella
Email	ella.salmela@santasport.fi
Tel.	040 541 9309

**Contact person for the processing operation or register**

Customer Service Manager	Oinonen Heidi
Email	heidi.oinonen@santasport.fi
Tel.	040 546 3985

### 3. Information on processing operations

**Processing operation name**

Customer data processing, accommodation of private customers

**Name of the register or information pool used for processing**

Santasport Hotellin asiakasrekisteri

**Purpose of processing**

Customer data is used for accommodation services, such as handling reservations, payments, payment monitoring and collection. Marketing of Santasport's goods and services, business development and the development of customer services related to it.

**Legal basis for processing**

The processing of personal data is based on the customer relationship that arises when a person makes a reservation for accommodation or stays at the hotel. Provisions on the processing of accommodation data are laid down in the Act on Accommodation and Food Service Activities 308/2006 (FIN).

The processing of personal data for marketing purposes is based on consent, which the customer can give when booking accommodation on the website (by ticking a box).

**Retention period of personal data**

1-3 years

Travel declaration (passenger card) 1 year

Customer data 3 years

### 4. Registered

**The processing operation processes the data of the following categories of persons:**

Private customers staying at the Santasport Hotel

## 5. Personal data processed, its sources and transfer

The table below presents the personal data or categories of personal data to be processed, where it has been obtained from, i.e. the source of the personal data and to where it may be transferred, i.e. the object of the transfer of personal data. The table describes at a general level the personal data flow of the processing operation.

Personal data or Category of personal data	Source of personal data	Data transfer destination
Passenger's full name Personal identity code or date of birth Passenger's postal address	Provided by the customer	Travel notification Data Process: "Laskutustietojen käsittely" (Billing information in the case of invoice sales)
Passenger travel document number (foreign guests only)	Provided by the customer	Travel notification
Passenger's spouse and full names and personal identification numbers of minor children Date of arrival and departure Country from which the traveler arrives Purpose of the trip	Provided by the customer	Travel notification
Phone number Email address	Provided by the customer	Not transferred
Billing information, if different from passenger information (billing customers only)	Customer or person making the reservation Announced by	Data Process: "Laskutustietojen käsittely"

## 6. Disclosure and publication of personal data

### Disclosure of personal data

The data of guests may be disclosed to the competent authority on the basis of a statutory request for information. E.g. travel notification data is disclosed to the police in accordance with sections 8–9 of Act 308/2006 on accommodation and food service activities.

### Transfer of personal data outside the EU

Data is not transferred outside the EU

### Publication of personal data

No personal data is published

## 7. Information systems, data security and manual processing of personal data

### Information systems and/or data repositories used in the processing operation:

Hotellinx

### Information systems and/or data repositories ensure data security in the processing of personal data as follows:

Restriction of usage rights and identification of users, as well as monitoring usage.

**Manual processing of personal data or documents used in the processing of personal data:**

Travel declaration form (accommodation card)

**In manual handling, data security is ensured as follows:**

Accommodation cards are handled with care, stored in a locked space and disposed of regularly.

**8. Rights of the data subject and their exercise**

According to the General Data Protection Regulation, as a data subject You have the rights listed below.

1. **Right to be informed**  
> Information on the processing of your personal data can be found in this privacy statement.
2. **Right of access**
3. **Right to rectification**
4. **Right to erasure**
5. **Right to restrict processing**
6. **Right to data portability**
7. **Right to object**
8. **Right not to be subject to a decision based solely on automated processing.**

More information about these rights and how you can exercise them can be found on the page <https://redu.fi/dataprotection>.

**9. Distribution**

All the original privacy statements of the Rovaniemi Joint Authority for Education are stored in the ROKKI intranet privacy statements file library. In addition, copies of the leaflets are available:

REDU website <https://redu.fi/dataprotection> page.