

06/03/2020

## DESCRIPTION OF THE CARUNA GROUP'S CUSTOMER REGISTER

## 1. Data Controller

Caruna Oy, business ID 1618314-7  
Caruna Espoo Oy, business ID 2059588-1  
Both companies hereinafter jointly 'Caruna'

Visiting address: Upseerinkatu 2, Espoo  
Postal address: PL 1, 00068 CARUNA  
Tel: 020 520 20  
Website: www.caruna.fi

## 2. Responsible Person

|                              |                                            |
|------------------------------|--------------------------------------------|
| Responsible Person:          | Sanna Turunen<br>tietosuoja@caruna.fi      |
| Data Protection Coordinator: | Tanja Koikkalainen<br>tietosuoja@caruna.fi |

## 3. Name of the Register

Customer register

## 4. Purpose of Processing Personal Data

Caruna collects and processes personal data of its customers as well as other persons related to the handling of customer relationships (data subjects) for the following purposes:

- Implementation, maintenance and development of customer relationships
- Identifying customer relationships and data subjects
- Analysis, offering, development and direct marketing of the use of the services produced by Caruna and its group companies as well as their business partners in relation to the customer relationship. The customer data may be profiled while developing and targeting Caruna's services not effecting to the availability of services. The services ordered by the customer and the customer's personal interests may be utilized during the profiling process.
- Tracking and collection of payments
- Verifying customer orders and changes and tracking orders
- Customer communications
- Implementing customer satisfaction surveys and other corresponding surveys
- Compiling statistics

The main justification for processing personal data is the contractual relationship between Caruna and its customer or preparatory measures for a contract. The processing of personal data is based on the customer relationship between Caruna and the customer and on the fulfilment of the rights and obligations arising from that relationship.

With respect to direct marketing, profiling, development of services and customer surveys, the data processing carried out by Caruna and the business partners it uses is based on legitimate interest.

The processing is also based on compliance with statutory obligations. Caruna has such obligations particularly arising from electricity market legislation and authority regulations

06/03/2020

issued under said legislation. These obligations concern, for example, supplying services related to electricity distribution, measuring energy consumption and invoicing customers. When processing personal data, Caruna complies with the applicable legislation, such as electricity market legislation, energy efficiency legislation and data protection legislation.

## 5. Content of the Register

In connection with the register, data registered for the purposes listed in section 4 can be processed, such as:

- Basic information on the data subject (name, personal identification number, contact information)
- Basic information on contact persons who are not consumer customers (name, contact information) and information about the employer and occupation
- Data related to the implementation and handling of the customer relationship and customer's needs and wishes
- Communication with the customer and others who contact Caruna (such as e-mails, chat discussions and telephone recordings)
- Data related to the contractual relationship and the services and products it covers
- Metering and installation data concerning the place of electricity use
- Payment information
- Invoicing and payment transaction data
- Information on customer notification of electromagnetic hypersensitivity
- Information on customer segmentation and profiling (such as predictions regarding the household, attitudes and purchasing behavior)
- Data on direct marketing and similar consents and blocks

Providing basic data on the data subject and invoicing data is a requirement for Caruna to supply services. Furthermore, statutory obligations require that Caruna collect, for example, data on the data subject's consumption and production of energy. Failing to provide the required information or prohibiting their collection can hinder or completely prevent Caruna's ability to provide services.

As described in section 10 below, the data subject has the right to prohibit or restrict the processing of his or her data, for example, the right to prohibit the use of his or her data for direct marketing.

## 6. Regular Sources of Data

Data on the data subject is obtained from:

- The data subject or a person authorised by the data subject directly
- The customer's electricity vendor when the vendor submits the necessary information for offering network services when entering into a sale or supply agreement
- Business partners providing services to the Caruna group or third parties, for example, as defect notices or in conjunction with repairing a defect
- Credit institutions in the form of credit ratings when entering into an agreement or during a contractual relationship
- The registers of registrars offering contact information, update, or data enrichment services or other corresponding services
- Authorities, such as the enforcement authorities
- Public sources

06/03/2020

The data will be updated in compliance with the protocols for data transfer on the electricity market drafted by Finnish Energy.

#### 7. Regular Disclosures of Data

Caruna can transfer personal data in its register to third parties, such as electricity market parties, or disclose it to the authorities only to the extent permitted and required by electricity market and other legislation or with the express consent of the data subject. Data is disclosed to business partners of the Virtane.fi service with the consent of the data subject.

Caruna may transfer personal data to its other personal data registers or to other companies of the group.

Caruna can transfer data to the extent necessary from its customer register to its business partners providing services. In such cases, the party in question will process personal data on behalf of Caruna and will have entered into an agreement concerning, among other things, the confidentiality of the data.

#### 8. Transfer of Data Out of the EU or European Economic Area

No personal data in Caruna's customer register is transferred out of the EU or EEA. In the event data is transferred out of the EU or EEA, this is separately agreed and the reliability of the processing of personal data is properly secured through agreements.

#### 9. Register Security Principle

Access to personal data is restricted to persons who need the data in the course of their work.

Access to digital data is restricted through access rights, and the data is further secured for the duration of processing through other technical means, such as encryption, firewalls and other data security measures.

Data in a physical form is kept in locked spaces with restricted access.

#### 10. Right to Access, Objection and Rectification

Under data protection legislation, the data subject has the right to access the information on him or her in the register. The processing of an access request requires that the person in question be identified. Therefore, access requests should primarily be made using the online form at [caruna.fi/en/privacy-policy](https://caruna.fi/en/privacy-policy) or personally at Caruna's headquarters in Espoo. When the request is made at Caruna's headquarters, the identity of the person making the request is verified by means of a valid passport or a photo ID.

If none of the above ways of making the request is feasible, the data subject can print the access request form through a link on Caruna's website [caruna.fi/en/privacy-policy](https://caruna.fi/en/privacy-policy) and send it by mail to Caruna Oy, Tietojen tarkastuspyyntö, PL 1, 00068 CARUNA. It can also be sent by e-mail to the address [tietosuoja@caruna.fi](mailto:tietosuoja@caruna.fi). A copy of a valid passport or an ID card with a photo must be enclosed with an access request sent by mail or e-mail.

Caruna is entitled to reasonable compensation for providing the data if the data subject requests multiple copies of the personal data in question.

Under data protection legislation, the data subject is entitled to object to the processing and transfer of his or her personal data for direct advertising, distance selling and other

06/03/2020

direct marketing purposes as well as for market and opinion surveys and for the purposes of registers of people and genealogy by making an objection to direct marketing in the digital service Caruna+ at [caruna.fi](http://caruna.fi) or notifying Caruna customer service of the objection. The right to object does not apply to, for example, customer communications that is required due to contract terms and conditions.

Under data protection legislation, the data subject is entitled to object to the processing of personal data, request the rectification or removal of personal data, request the limitation of the processing of personal data and have his or her personal data transferred from one system to another in the circumstances provided for in data protection legislation. Requests relating to these rights must be made by contacting the person at Caruna responsible for register matters.

If the data subject deems that his or her statutory rights have been violated, the data subject is entitled to contact the Data Protection Authority. The Data Protection Authority's contact information is available at [www.tietosuoja.fi](http://www.tietosuoja.fi).

#### 11. Duration of Storage of Personal Data

Customer data is stored for 10 years after the end of the customer relationship, after which time the data will be deleted during the following calendar year. Technical metering and installation data concerning the place of electricity use continues to be stored even after the data concerning the customer of the place of electricity use is deleted.

Telephone recordings are destroyed latest 10 years after being recorded.