

The Finnish Museums Association Group's data protection policy – Customer register

The Finnish Museums Association Group has two personal data registers for managing customer and public relations: the Stakeholder Register and Customer Register. This statement describes the latter.

Customer Register

Who is the data controller?

The Finnish Museums Association (FMA) Group's Customer Register is a so-called joint register. It is managed jointly by the entities belonging to the FMA Group listed below:

Finnish Museums Association (0202228-9)
Pohjois-Esplanadi 35 Aa
00100 Helsinki
business ID: 2673987-4

FMA Creations Oy (2673987-4)
address as above

Founded in 1923, the Finnish Museums Association (Suomen Museoliitto ry – Finlands Museiförbund rf) is the central organisation of Finnish museums. Its statutory purpose is to promote the general development and publicity of museums and to act as the sector's cooperation body.

FMA Creations Oy (FMAC) is a limited liability company that is 100% owned by the Finnish Museums Association, and whose main product is the Museum Card.

Why a joint register? Can the above-mentioned entities not keep their own personal data registers?

A joint register means that its administrators jointly define the purpose and means of the processing of personal data.

The FMA Group's associations ultimately implement Finnish museums for the same purpose. Similarly, the persons registered in the Customer Register use or have used museum branch services.

The joint register ensures the accuracy, integrity and usability of the data. For example, if a Museum Card customer reports a change of address, they do not need to report the

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same matter to the Finnish Museums Association in order to receive up-to-date information about the training services it offers.

For what reason is personal data processed? What is the legal basis for processing?

The personal data stored in the Customer Register is used for the production of services aimed at consumer customers and other natural persons and for communicating about them, managing the customer relationship and continuously developing the services and customer experience of the museum branch.

Personal data in the Customer Register may also be used for museum branch communications aimed at the data subject that are compatible with the purposes described in the previous paragraph, provided that the data subject has given their consent. *Consent is not a prerequisite for using the services. You can change your consent at a later date or withdraw it completely.*

The legal basis for the processing of personal data is the consent of the data subject and the execution of the agreement between the data subject and the data controller.

What kinds of personal data are stored in the Customer Register?

The principle of data minimisation applies to the processing of personal data. This means that the data pertaining to the data subject that is stored depends on the nature of the customer relationship. Not all of the data listed below will be stored for each data subject. For example, information about previously completed training and degrees, possibly even diet, is collected from participants in training events. In the Museum Card service, this information is not required, but the registration of Museum Card visits is a key prerequisite for the provision of the service.

The following data is stored in the Customer Register, with the specifications made in the previous paragraph:

- name, contact details and year of birth of the data subject
- service number, customer number, password and any other unique identifiers
- data pertaining to the customer relationship, such as invoicing, payment, product and order information
- data required for the technical implementation of the service, such as event data and data on Museum Card visits
- data relating to the use and personalisation of the service, such as browsing and search data as well as interests, favourites and training information reported by the data subject
- feedback or other assessments on the quality of the service received from the data subject
- information relating to the exercising of the rights of the data subject, such as consents and their withdrawal, and requests for rectifications or erasures of data
- other data collected with the consent of the data subject.

How is the Customer Register's personal data collected and how is it processed?

The personal data processed in the register is primarily obtained from the data subject themselves in transactions related to customership, the use of services, registration, participation, invoicing and other services.

Cookies and other similar technologies are used to collect information about the use of the FMA Group's own and third-party websites. The data is used to improve the user experience, personalise use and compile statistics on visitor traffic.

By changing your browser settings, you can block cookies and other tracking. It is possible to prevent the use of non-essential cookies when visiting websites. However, refusing cookies may lead to reduced functionality.

The security of the processing of personal data stored in the Customer Register is ensured through technical and organisational safeguards. Access to personal data is restricted to those who are responsible for processing the data in question.

Will personal data in the Customer Register be disclosed to others?

The personal data stored in the Customer Register has been collected for the use of the FMA Group for the aforementioned purposes and will not be disclosed to third parties or third countries. The data controller may naturally use subcontractors for the processing of personal data. These include, for example, the providers of the Museum Card service's technical platform, storage space and analytics services.

How long will the data in the Customer Register be stored?

The personal data stored in the Customer Register is automatically deleted five years after the end of the calendar year in which the data subject has completed their last transaction or in which the customer or contractual relationship between the data subject and the entity belonging to the FMA Group is considered to have ended.

The purpose of storing personal data for the period mentioned in the previous paragraph is to enable the data subject to continue monitoring their own training events, Museum Card visits, etc. after the end of the customer or contractual relationship, or to re-subscribe to the service with a low threshold.

The data subject may request the erasure of personal data that is no longer necessary for the provision of the service to which they are subscribed. For example, the personal data of a Museum Card customer can be deleted at their request after the card has expired and all Museum Card visits have been recorded for their locations.

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What other rights does the data subject have?

Subject to the restrictions laid down in the EU General Data Protection Regulation (GDPR) and the Data Protection Act, a data subject has the right to request access to personal data pertaining to them as well as the right to request the rectification or erasure of the data in question, the restriction of processing or to object to processing and the right to transfer the data from one system to another.

The erasure of necessary personal data or the restriction of their use during the agreement period will result in the suspension of the service.

The data subject has the right to lodge a complaint with the supervisory authority: tietosuoja.fi.

Who provides information about the Customer Register?

The data protection officer, Group Legal Counsel Veli-Markus Tapio, is responsible for requests related to the register, veli-markus.tapio@museoliitto.fi, 040 5366580.