

PRIVACY POLICY FOR THE MUSEUM CARD

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This Privacy Policy applies to users of Museum Card services, users of online services, participants in customer surveys and recruitment processes, contact persons for Museum Card sites and marketing customer segments.

The Museum Card is a personal card. The service provider maintains the Museum Card customer register, which stores, for example, customer details provided when starting to use the service and statistical data about the services used. The data are used for the maintenance and development of the Museum Card system, for communication related to the validity and use of the service and, if the customer provides their consent, for the communication and marketing of content, services and benefits related to the Museum Card, Museum Card sites and other partners.

Customer details are not disclosed to any third parties, except anonymised for research purposes, or if the law or a public official so requires. Customers have the right to request the deletion of their data from the customer register. This is also a request to stop providing the service, in which case the Museum Card will cease to be valid.

A mobile application of a service provider that is made available to a user via, for example, the Apple App Store or Google Play, is subject not only to this Privacy Policy, but also to the terms and conditions of such a service provider. You can read Apple's terms [here](#), Google's terms [here](#) and Microsoft's terms [here](#).

1. CONTROLLER AND NAME OF THE REGISTER

The name of the register is Museum Card Customer Register.

Name: FMA Creations Oy

Business ID: 2673987-4

Postal address: Fredrikinkatu 39 C 22, 00120, Helsinki

- Contact the customer service for information about the register:
museokortti@museot.fi, 044 784 57 45 (weekdays 9–12)

2. PURPOSE OF THE PROCESSING OF PERSONAL DATA

The main purpose of the Museum Card customer register is to provide the Museum Card services.

The Museum Card customer register consists of the following sub-registers:

- Museum Card customers
- Museum Card marketing
- Museum Card online services
- Museum Card mobile application
- Museum Card partnerships and partners

- Museum Card sites and contacts
- Museum Card surveys and job applications

The user's personal data may be processed for the following purposes:

- implementation and development of the service,
- information about the products and services of the Museum Card sites or the register operator,
- customer relationship management and development,
- communication on the validity of the Museum Card,
- verification of customer activities,
- customer service and business development,
- marketing,
- analysis and compilation of statistics,
- opinion polls and market surveys
- personalisation of content and targeting of communications,
- notifications and functions in the mobile application,
- verification of customer's identity,
- collecting and using feedback,
- increasing product insights, and recruitment processes.

3. CONTENT OF THE REGISTER

The register contains the following data:

- contact and personal data, such as name, address, telephone number, e-mail address, year of birth,
- registration data, such as Museum Card number, password and any other unique identifier,
- information on museum visits and reviews,
- customer relationship details, such as billing and payment data, product and order data, vendor details, customer feedback and contact details, sweepstakes and contest response data, survey and research data, service personalization data, and cancellation data,
- data related to the implementation and targeting of communications and data about the use of services, such as browsing and search data,
- details on profiling, points of interest, and favourites provided by the customer
- image material downloaded and uploaded by the customer,
- permits and consents,
- details on partnerships and collaborators,
- Museum Card sites and contact details for Museum Card sites,
- details on marketing bans, and
- other data collected with the customer's consent.

4. PERSONALISATION AND PROFILING OF THE SERVICE

As part of the processing of personal data stored in the customer register, the Museum Card may also use the data collected about the customer for profiling and personalisation purposes. Personalisation is founded on defining the customer's customer segment based on various criteria that are known about the customer (e.g. what kind of museums they like).

Customer segments can be created for different business purposes. Examples of such personalisation-based purposes include the personalisation of marketing communications for marketing authorisation holders, and communicating about exhibitions and events at Museum Card sites, based on, for example, a location or declared area of residence.

Data resulting from profiling will not be disclosed to third parties outside the service chain without the explicit consent of the customer. However, the customer always has the right to object to the processing of personal data for direct marketing purposes, where the data are related to him/her and are a result of profiling. Any consent on direct marketing previously given by the customer can be withdrawn without any specific limitations.

5. LEGAL GROUNDS FOR THE PROCESSING

The legal grounds for the processing are as follows:

- The processing is necessary for the performance of a contract to which the data subject or the customer is a party or for the performance of pre-contractual measures at the request of the data subject. (Such as implementation of Museum Card services)
- Explicit consent given by the data subject (which can be withdrawn by the customer at any time). (e.g. processing of data at the request of the customer, requests for rectification)
- The processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party. (Such as partnerships)

6. REGULAR DATA SOURCES

Data on the customer is obtained on a regular basis:

- from the customer in writing, by phone, internet, mobile app, email or other similar means,
- based on visits to a Museum Card site,
- using cookies, pixels or other similar technologies.

A cookie is a small text file that is stored by the browser on the user's device and provided by the user's browser to the website each time the user visits the website. Cookies contain a unique identifier that allows users to be identified. A pixel (e.g. Facebook, Google) is a piece of code on a website, i.e., a cookie, which collects data about the use of the site. Pixels are used for Museum Card advertising and communications targeting.

Like other online services, the Museum Card uses cookies to deliver services, facilitate the use of services and target communications. The user cannot be identified by cookies alone. Cookies and the data collected through them are also used to analyse the usability and use of the service, improve security, monitor usage, and develop the service. Cookies can also be used to deliver targeted communications and content.

The user can give his/her consent or refuse the use of cookies in his/her browser settings. Cookies are necessary for the functionality of some Museum Card services. Some cookies are stored on the user's computer even after the user has left the site. Cookies may be stored for months or years after the last visit to the site until they are deleted.

7. REGULAR DISCLOSURES AND TRANSFERS OF DATA OUTSIDE THE EUROPEAN UNION OR THE EUROPEAN ECONOMIC AREA

Data may be disclosed on a regular basis:

- for the purpose of the service and for the communication and marketing of the service,
- as anonymised data for use by Museum Card sites,

- as anonymised data for opinion polls and market surveys, statistical analysis, and other similar reports.

Data are not regularly transferred or disclosed outside the EU or the EEA.

8. RIGHTS OF A DATA SUBJECT

The data subject has the following rights under the Personal Data Act:

- a) The right to know what data relating to him/her are recorded in the personal data register, or that there are no data relating to him/her recorded in the register, the regular sources of the data in the register and the purposes for which the data in the register are used and regularly disclosed.
- b) The right to demand the rectification, deletion or completion of personal data in the register which are inaccurate, unnecessary, incomplete or out of date for the processing purposes.
- c) The right to deny the controller from processing data relating to him/her for the purposes of direct marketing, distance selling and other direct marketing, as well as market research and public opinion polling.

As of 25 May 2018, the data subject has the following rights under the EU General Data Protection Regulation (GDPR):

- a) The right to obtain confirmation from the controller that personal data relating to the data subject are or are not being processed and, if such personal data are being processed, the right of access to the personal data and certain information as defined in the EU GDPR.
- b) The right to object to the processing of data for certain purposes defined in the EU GDPR, such as direct marketing.
- c) The right to withdraw consent at any time without affecting the lawfulness of the processing carried out on the basis of the consent before its withdrawal.
- d) The right to demand the controller to rectify, without unjustified delay, inaccurate or incorrect personal data concerning the data subject and the right to have incomplete personal data completed.
- e) The right to obtain from the controller the deletion of personal data relating to the data subject without undue delay in the situations defined in the EU GDPR.
- f) The right for the controller to restrict processing in the situations defined in the EU GDPR.
- g) The right to obtain, in certain situations defined in the EU GDPR, personal data relating to the data subject which the data subject has provided to the controller, in a structured, commonly used and machine-readable format, and the right to transfer such data to another controller without hindrance from the controller to whom the personal data have been provided.
- h) The right to lodge a complaint with a supervisory authority if the data subject considers that the processing of personal data concerning him/her infringes the EU GDPR.

Requests concerning the exercise of the rights of the data subject shall be addressed to the contact person of the controller mentioned in section 1.

9. PRINCIPLES ON THE PROTECTION OF THE REGISTER

Manual material

Manually processed documents containing personal data are destroyed or properly archived after the processing.

Electronically stored data

Only employees whose job entitles them to process customer data are entitled to use the system containing customer data. Everyone who processes personal data has signed a confidentiality agreement. Access to the system is protected by a username and password combination. The data are collected in databases that are protected by firewalls, passwords and other technical means. The databases and their backups are located in locked rooms and only certain pre-designated persons have access to the data.

10. THE RETENTION PERIOD OF PERSONAL DATA

The data stored in the customer register will be automatically deleted 5 years after the expiry of the Museum Card. Criteria for data retention:

- The customer is able to reactivate the card.
- Customers can view their own visits to Museum Card sites and the reviews they have left.
- Statistical reasons related to Museum Card sites, and verification of payment transactions.

The data (e.g. contact details) of Museum Card sites that are part of the Museum Card system will be deleted if the museum leaves the system and 5 years have passed since the departure. Legal grounds for data retention:

- Maintaining the system and implementing the service
- Statistical reasons related to Museum Card sites, and payment transactions

11. CHANGES

The Museum Card may make changes to this Privacy Policy by notifying changes through notices on the website or by email.