

Data protection policy of Puunjalostajakilta ry

The purpose of this document is to relay the essential information on the data protection policy of Puunjalostajakilta ry (Forest Products Guild, PJK) to the people in charge of updating or handling the person registers that the guild has.

Puunjalostajakilta ry currently has the following registers:

- Member register
- Event signup register

This document and the privacy statement for the registers listed above are updated if needed and yearly, no later than the 31st of January, as the board and persons in charge change. The persons responsible for the updates are the persons in charge of the registers.

User rights of the data protection registers and handing over the information

Limiting access to the information plays a very important role in preventing data protection problems. Access should be limited only to individuals who have the need to access the information in order to manage the guild's activities. For example, the whole board of the guild should not have access rights at the start of the term; rather, the access should be limited to the person responsible for the register. The person responsible for the member register in our guild is always the incumbent treasurer, unless a separate decision stating otherwise has been made. The person responsible for the event signup register in our guild is always the incumbent public relations officer, unless a separate decision stating otherwise has been made. The controller of the register will ensure that access to the register is only limited to the appropriate individuals.

Correspondingly, the access rights of the previous members of the board should be removed immediately after the change of the term. If a previous member of the board or previous official will need access to the register in their new board or official position during the new term, it is not needed to remove the access rights of the person in question. The removal of old access rights should be done no later than on the 31st of January. The person responsible for the update is the person in charge of the register.

The information of the registers are not to be handed over to outside parties without separate approval from person intending to register. If the information needs to be handed over to any third party, such as company, hotel or restaurant, because of the event arrangements, the person intending to register should approve it by separate opt-in-approval that states the reasons for handing over the information.

Life cycle of the information

The information in the registers must be kept only for as long as it serves its purpose. The member register must thus naturally have all the member information of the members of the guild, and they must be removed when the person leaves the guild. The information should be removed within a reasonable timeframe, at most within one month from leaving the guild. In special cases, the information of the registered person can be stored longer, in which case the registered person in question will be informed of the reason for the extension. The special cases include for example case that outstanding claims should be collected from a previous member of the guild or there is unfinished legal case between the guild and the previous member of the guild.

In the case of the event signup register, the information should be removed when it is seen that it is not essential or needed for the event for which the information has been gathered. In terms of a normal events,

this means about two weeks. If some of the information is required after this, for e.g. collecting participation fees, the information can be stored longer until there is no longer need for it. Anonymous data can be gathered from people who have attended events, meaning attendance numbers, amounts of omnivores and vegetarians, or other information that is not linked to register data. This information should be kept in a separate register.

Technical assurances for data protection

The technical execution of the registers is important in addition to access rights. The information is stored only in electronic format, in trustworthy servers operated by third parties, which complies with the EU GDPR. The encryption of the register is done using own passwords of Puunjalostajakilta ry.

The event signup register contains information of dietary restrictions of individuals. The wording here is important, because allergy information is considered sensitive private information, whereas dietary restrictions are considered normal personal data. The legislation on data protection concerning sensitive private information is noticeably stricter than the legislation on data protection concerning normal personal data.

Right of an individual to check and request for corrections in the information

A private individual has the right to request for the information that the guild has on them. In practice, this means the member register information.

There are only very little information on a person in the member register and event signup register, so it is not hard to do a quick search of both the member register and event signup register. The information should be handed over primarily in the same format as the request, meaning that an email should be answered to with an electronic reply with the information. A reasonable amount of time for processing the request is one month.

When required, the requesting party can be asked to verify their identity or to specify the request. Correspondingly, the individuals have the right to request for a correction in their information. A reasonable amount of time for correction requests is also one month.