

## PRIVACY STATEMENT

A description of the processing of personal data and the rights of the data subject according to EU General Data Protection Regulation, (EU) 2016/679

Name of the registry: Digiväylä navigation browser (internet-site) and AR & VR-applications

Date of issue: 18.11.2020

<b>1. Registrar</b>	City of Outokumpu Address: Hovilankatu 2, 83500 Outokumpu PL 47, 83501 Outokumpu Tel. +358 13 5591 <a href="mailto:kirjaamo@outokummunkaupunki.fi">kirjaamo@outokummunkaupunki.fi</a>
<b>2. Representatives of the registrar</b>	Jukka-Pekka Lätti, development director, Outokummunkaupunki. Juuso Hieta, CEO, Outokummunkaupunki Teollisuuskylä Oy.
<b>3. Data protection officer</b>	Pekka Jääskeläinen Address: Hovilankatu 2, 83500 Outokumpu PL 47, 83501 Outokumpu Tel. 050 464 3324 <a href="mailto:pekka.jaaskelainen@outokummunkaupunki.fi">pekka.jaaskelainen@outokummunkaupunki.fi</a>
<b>4. Purpose of processing personal data</b>	<p>Personal data is processed for the management and analysis of customer and other business-related relationships, the provision and personalization of services, business development and planning, as well as marketing, distance selling, opinion and market research and customer communications, which can be targeted via Digiväylä.</p> <p>The City of Outokumpu may use the location information of the user's terminal for all purposes mentioned herein, provided, as a general rule, to provide services based on the user's location or to provide internal analysis of the user's activities, provided that the user consents to the city of Outokumpu or if the location information is anonymous. The user can withdraw their consent at any time by deleting their browser's history and closing the browsing session via Internet browser. No user info is stored or archived after the browsing session and/or the use of AR-applications has been shut down.</p> <p>General condition for the processing of personal data: Section 8 (1) (1), (2), (5), (6) and (7) of the Personal Data Act.</p>
<b>5. Legal basis for the processing of personal data</b>	<ul style="list-style-type: none"><li>• Consent given by the data subject</li><li>• Compliance with the controller's legal obligations</li><li>• Consent given by the data subject</li></ul> <p>Article 6 of the General EU Data Protection Regulation (2016/679), Article 9 for specific categories of personal data.</p>

**6. Information content of the register  
(Outokumpu Manager)**

- \* First and last name
- \* contact information (postal address, telephone number, e-mail address)
- \* the time and manner of the beginning and end of the customer relationship and / or business relationship
- \* information on the use of electronic services and content, technical information sent to the server by the registrar by the registered browser (eg IP address, browser, browser version, page from which the registrant has moved to our site) and related information sent to the registrant's browser
- \* marketing and promotional information, such as marketing activities targeted at the registrant and participation in them (eg participation in marketing lotteries and competitions and events)
- \* information related to customer and other relevant contact management and communication (eg purchase and cancellation information for paid products and services, order information for free products and services, delivery information, feedback, complaints and recordings of customer service transactions, such as e-mails and text messages)
- \* interests declared by the data subject
- \* language
- \* information on changes to the information identified above

Information derived from the use of the Service or other information provided by the Customer itself through analytics, such as potential interests or membership in a particular group of users.

With the customer's consent, location information, such as coordinates defined using GPS or a WLAN access point or cellular base station. The user should note that blocking the use of location information prevents the provision of location-based services to the user.

In addition to the above, the register may process the following information about those who have purchased or rented a product and / or service:

- \* customer number
- \* business ID
- \* Billing and credit information

The register may also process the following information:

- username
- \* password
- \* nickname
- \* information related to the service of the identified user, such as usage information of the service features

<b>7. Regular sources of information</b>	Consent obtained from the data subject via a web browser and applications.
<b>8. Processing systems</b>	<p>A. Electronic information systems</p> <p>Digiväylä map browser application (and provided location if given the consent for gps-info)  Digiväylä AR and VR applications  Outokumpu Manager: Company's own product card with provided info therein: published advertising and event info.</p>
<b>9. Principles of data protection</b>	<p>A. Electronic information systems</p> <p>The system administrator manages the permissions and instructs the users.</p> <p>Hurja Solutions Ltd and 3D Talo Ltd are responsible for the information security of the applications (navigation, VR &amp; AR).</p> <p>AVEK-esitysratkaisut Ltd is responsible for the information security of the publishing system &amp; monitors.</p>
<b>10. Automated decision-making, including profiling (Article 22 of the EU Data Protection Regulation)</b>	No automated decisions are made.
<b>11. Regular disclosures</b>	<p>Third parties in the role of system administrator, which may include name, e-mail and other contact information include:</p> <ul style="list-style-type: none"> <li>- Hurja Solutions Oy</li> <li>- Avek esitysratkaisut Oy</li> <li>- 3D Talo Oy</li> <li>- Antibox Design Oy (Corporate product card making)</li> <li>- Outokumpu Industrial Park Ltd.</li> </ul>
<b>12. Data transfer outside the EU or the EEA</b>	No data is transferred outside the EU or the EEA.
<b>13. Retention period of personal data</b>	The retention period is specified in the information management plan, which considers the requirements of the Archives Act and other legislation on the minimum retention periods of documentary information for permanent or temporary retention.
<b>14. Rights of the data subject</b>	<p>The data subject has the right to verify personal data concerning him/her. A person can exercise their right of inspection free of charge once a year. The fees charged for the documents are based on a valid decision of Outokumpu's City Board.</p> <p>The data subject has the right to request the correction / correction of data.</p>

The data subject has the right to request a restriction on the use of the data or to object to the processing (only in exceptional cases, if there is any ambiguity in the processing of the data, during the investigation). A request for verification or correction / correction of information is made primarily to the person in charge. If no such person exists or no consensus can be reached, the request shall be made in writing using a form provided to the Registry. The applicant must prove his identity. The Data Protection Officer will advise if necessary.

The data subject has the right to lodge a complaint with the Office of the Data Protection Officer if the data subject considers that the processing of personal data concerning him or her has violated the applicable data protection legislation.

Office of the Data Protection Officer  
PL 800, 00521 Helsinki  
Email: tietosuoja@om.fi  
Tel.: 029 566 6700  
Fax: 029 566 6735

Rights not applicable in this register and basis:

The right to delete data does not apply because the processing of the data is necessary to comply with a statutory legal obligation to process the data.

The processing of data is not based on consent but on the performance of a statutory task.