

<b>ARCTIC HOTEL COLLECTION CUSTOMER REGISTER</b>			
Information document on the processing of personal data in the customer register of City-Hotelli Oy and Arctic Light Hotel Oy in accordance with the EU General Data Protection Regulation			
<b>1. Keeper of the register</b>	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;">City-Hotelli Oy Pekankatu 9 96200 Rovaniemi</td> <td style="width: 50%; border: none;">Arctic Light Hotel Oy Valtakatu 18 96200 Rovaniemi</td> </tr> </table>	City-Hotelli Oy Pekankatu 9 96200 Rovaniemi	Arctic Light Hotel Oy Valtakatu 18 96200 Rovaniemi
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<b>2. Contact person for matters concerning the register</b>	The contact person for matters relating to the register and the exercise of the rights of the data subject is: Miko Gröhn, 020 1710 100, <a href="mailto:miko.grohn@arctichotelcollection.fi">miko.grohn@arctichotelcollection.fi</a>		
<b>3. Name of the register</b>	Arctic Hotel Collection customer register		
<b>4. Legal basis for processing personal data</b>	<p>The processing of personal data in the customer register is based on the customer relationship of consumer and business customers with City-Hotelli Oy or Arctic Light Hotel Oy. Because of the customer relationship, the processing of data is based on legitimate interest.</p> <p>The controller also processes customer data based on a contract between the controller and the data subject. On this basis, personal data collected from the data subject when making a table or room reservation or for room and restaurant billing purposes are processed.</p> <p>Where the processing is based on a legitimate interest or a contract, the data subject does not have to give his or her consent to the processing.</p>		
<b>5. Purposes of the processing of personal data</b>	<p>The purposes for which the customer data in the customer register is used are:</p> <ul style="list-style-type: none"> <li>- customer relationship management and development</li> <li>- Customer relationship management and customer relationship management</li> <li>- processing customer reservations</li> <li>- sales and implementation of services</li> <li>- processing of personal data relating to payment, invoicing, monitoring and collection of payments</li> <li>- marketing of the controller's services</li> <li>- business development and customer service by the controller</li> </ul> <p>Any special dietary information of the customer will only be used for the preparation and serving of food.</p>		

	<p>If the customer requests the controller to take into account the health status of the data subject in the provision of services, the health information provided by the customer to the controller will be used to provide the service. Such information may include, for example, physical disabilities or allergies or other information voluntarily provided by the customer to the controller.</p>
<p><b>6. Personal data processed</b></p>	<p>The controller processes the following personal data about customers:</p> <ul style="list-style-type: none"> <li>- customer's first and last name, date of birth, telephone number, address, e-mail address</li> <li>- nationality</li> <li>- booking details</li> <li>- customer's payment method details, billing details and any payment reference details</li> <li>- where the customer has opted out of the use of the data for direct marketing purposes</li> <li>- whether the customer has given consent to electronic direct marketing (by e-mail)</li> <li>- information on the use of services and purchases</li> <li>- information on customer choices and preferences (e.g. specific room preferences, accessibility issues)</li> <li>- any special dietary requirements</li> <li>- any customer feedback and complaints data</li> </ul> <p>For business customers, the controller processes the following personal data:</p> <ul style="list-style-type: none"> <li>- name, e-mail address, telephone number of the contact person of the business customer</li> <li>- the legal prohibitions on direct marketing, distance selling and other direct marketing as indicated by the contact person of the company</li> <li>- any customer feedback and complaints data</li> </ul>
<p><b>7. Where personal data is obtained</b></p>	<p>The controller receives the personal data processed directly from the data subject:</p> <ul style="list-style-type: none"> <li>- on the spot in hotels</li> <li>- by telephone</li> <li>- by e-mail</li> </ul> <p>When the data subject books accommodation services via <a href="http://www.cityhotel.fi">www.cityhotel.fi</a> or <a href="http://www.arcticlighthotel.fi">www.arcticlighthotel.fi</a>, the data subject discloses the personal data to a third-party booking service through which the controller receives the personal data.</p> <p>From third parties when the data subject:</p>

	<ul style="list-style-type: none"> <li>- books the services of the controller on the booking service website</li> <li>- books the controller's services with a booking service company (such as a travel agency or tour operator)</li> <li>- where the data subject's employer or association books the services of the controller for the data subject</li> <li>- where the data subject contacts or books the controller's services through a third party in any other possible way.</li> </ul>
<p><b>8. Recipients or categories of recipients of personal data</b></p>	<p>The information in the customer register will not be disclosed to third parties unless the customer specifically requests the controller to book third-party services for the customer, such as programme services or transport.</p> <p>However, please note:</p> <p>When the data subject books accommodation services through <a href="http://www.cityhotel.fi">www.cityhotel.fi</a> or <a href="http://www.arcticlighthotel.fi">www.arcticlighthotel.fi</a>, the data subject will disclose the personal data necessary for the booking through the third party booking channel.</p> <p>When the data subject submits a reservation enquiry via <a href="http://www.monterosa.fi">www.monterosa.fi</a> or <a href="http://www.arcticboulevard.fi">www.arcticboulevard.fi</a>, the personal data submitted to the reservation enquiry will be transmitted via the website operator.</p> <p>The data may be disclosed to public authorities on the basis of their requests for information under the law.</p> <p>The storage, maintenance and upkeep of the customer register is outsourced to an external system provider. The data of the data subject is processed only by the controller's staff who have a need to do so. Access to the register is limited and the data are stored in encrypted form in the system provider's data centre. The controller and the system vendor maintain an ongoing data protection plan, risk management and communication to ensure security.</p>
<p><b>9. Transfer of data outside the EU</b></p>	<p>The data will not be transferred outside the EU.</p>
<p><b>10. Retention period of personal data</b></p>	<p>The personal data contained in the customer register is processed for the duration of the customer relationship. The controller will consider the customer relationship to have ended if the customer has not used the services of the controller company for two years (730 days). A day is counted from the time of the last use of the service (such as a hotel room or table reservation). The data are automatically deleted from the register after the end of the customer relationship, unless there is another reason for keeping the data.</p>

	<p>However, after the end of the customer relationship, the data may be kept and processed if necessary to deal with complaints. The retention period of the data in the customer register will also be subject to the retention periods required by law, such as the Accounting Act. Data required by the Accounting Act will be kept for as long as required by the Accounting Act.</p> <p>Contact details of business customers will be deleted in a similar way after the business relationship is deemed to have ended. However, data may be retained after that date if there is another reason for doing so.</p> <p>Where data are processed under a contract between the controller and the data subject, the data are kept for as long as the data are needed to implement the contract. Once the contract has been executed, the data will be kept for as long as the customer relationship exists or there is another ground for processing (e.g. a complaint or accounting law).</p> <p>During the customer relationship, only data that is necessary for the specified purposes will be processed. The controller carries out regular periodic checks to delete unnecessary data.</p> <p>When the customer relationship ends, customer data may be transferred to the company's direct marketing register for persons who have not objected to the use of their data for direct marketing.</p>
<p><b>11. Rights of the data subject</b></p>	<p>Personal data contained in the customer register are processed on the basis of the legitimate interest of the controller (Article 6(1)(e) of the GDPR). In this case, the legitimate interest is the customer relationship. Personal data are also processed on the basis of a contract between the controller and the registers (Article 6(1)(b) GDPR). This ground for processing is further explained in Section 4 of the Privacy Statement.</p> <p>Where data are processed on the basis of a legitimate interest and a contract, the data subject has the following rights:</p> <p><b>The right of access of data subjects to their own data</b></p> <p>Data subjects have the right to request access to their personal data (= right of access) in order to find out whether data concerning them are processed in the register of members or not.</p> <p>As a general rule, the data subject has the right to know what data relating to him/her are stored in the register of members. The controller may ask the data subject to specify in an adequate manner which data or processing operations are concerned by the data subject's request.</p>

The data subject's right of access may be limited or refused under the GDPR if disclosure would adversely affect the rights and freedoms of others. Such protected rights include, for example, the controller's business secrets or the personal data of another person. National legislation (such as the Data Protection Act) may also limit the right of the data subject.

**Right to rectification**

The data subject has the right to obtain from the controller, without undue delay, the rectification of inaccurate or erroneous personal data concerning him or her.

**Right to erasure**

The controller shall, at the request of the data subject, delete personal data relating to the data subject without undue delay where one of the following conditions is met:

- the personal data are no longer necessary for the purposes for which they were collected
- the data subject objects to the processing of the personal data and there are no legitimate grounds for the processing on his or her own initiative
- the data subject objects to the processing of personal data for direct marketing purposes (in which case processing for other purposes is still possible)
- the personal data have been unlawfully processed

Even if one of these conditions is met, the data need not be erased if the processing is necessary, for example, for compliance with a legal obligation under EU or national law to which the controller is subject, or for the establishment, exercise or defence of legal claims.

**The right to object to the processing of your data**

Data subjects have the right to object to the processing of their personal data on grounds relating to their particular personal situation where the processing is based on legitimate interests.

The data subject does not have the right to object to the processing of personal data where the processing is based on a contract between the controller and the data subject.

If the data subject has objected to the processing of his or her data on grounds relating to his or her particular personal situation, the data subject must identify the specific situation on the basis of which he or she objects to processing on the basis of legitimate interests. The controller may continue to process the data despite

	<p>the objection if there are substantial and legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or if it is necessary for the establishment, exercise or defence of legal claims.</p> <p>The data subject has the right to object at any time to the use of personal data concerning him or her for direct marketing. If the data subject objects to the use of personal data for direct marketing, the data may no longer be processed for this purpose.</p> <p><b>Right to request restriction of processing</b></p> <p>At the request of the data subject, the controller must restrict the active processing of personal data in the following situations:</p> <ul style="list-style-type: none"> <li>- the data subject contests the accuracy of the personal data, in which case the processing must be restricted until the controller can verify the accuracy of the data</li> <li>- the processing is unlawful and the data subject requests the restriction of the processing instead of the erasure of the personal data</li> <li>- the controller no longer needs the personal data concerned for the purposes of the processing, but the data subject needs them for the establishment, exercise or defence of legal claims</li> <li>- the data subject has objected to the processing of the personal data (see above on the right to object) and the assessment of whether the legitimate grounds of the controller override those of the data subject is pending</li> </ul> <p>In principle, during the period of restriction of processing, data may only be kept. Data may also be processed for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest. Before the restriction on processing is lifted, the data subject must be informed.</p> <p><b>The right to transfer data from one system to another</b></p> <p>To the extent that the data subject has himself/herself provided personal data to the customer register which are processed by automated data processing and under a contract between the controller and the data subject, the data subject has the right to receive the data in a machine-readable format and to have the personal data transferred directly from one controller to another, where technically feasible.</p>
<p><b>12. Right to lodge a complaint with a supervisory authority</b></p>	<p>The data subject has the right to lodge a complaint with the competent supervisory authority if the data subject considers that the controller has not complied with the applicable data protection regulation.</p>

<b>13. Requests relating to the exercise of the rights of the data subject</b>	<p>For questions relating to the processing of personal data and situations relating to the exercise of the data subject's rights, the data subject may contact the contact person of the controller mentioned in point 2.</p> <p>A request for access or any other request for the exercise of the data subject's rights vis-à-vis the controller must be made in writing, by e-mail or by post. The request may also be made in person at the controller's premises.</p> <p>The controller may ask the data subject to specify adequately which data or processing operations are concerned by the data subject's request.</p> <p>In order to ensure that personal data are not disclosed to a third party in connection with the exercise of the data subject's rights, the controller may, if necessary, ask the data subject to submit a signed request for inspection. The controller may also ask the requester to prove his identity by means of an official identity document or other reliable means.</p>
<b>14. Updating the register</b>	The customer register has been updated on 16.10.2023 by the Data Protection Ombudsman.