

<b>ARCTIC HOTEL COLLECTION TRAVELLER INFORMATION 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 traveller information 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's Traveler Information Register		
<b>4. Legal basis for processing passenger data</b>	The processing of passenger data and the keeping of a passenger register is based on the law on the hotel and restaurant industry.		
<b>5. Purposes for which passenger data are used</b>	<p>On the basis of the Accommodation and Catering Act an accommodation provider may keep an automatic by means of data processing or manually by means of the following 6 below (the Passenger Register).</p> <p>Passenger data and the Passenger Name Record are used for general public order and safety and to prevent and combat crime prevention and detection of crime and for the compilation of statistics.</p> <p>Passenger data may be used by an accommodation provider to the Passenger Name Record for customer service and direct marketing purposes. Pursuant to Article 29 of the Personal Data Act, the customer has the right to the right to object to the use of their data for direct marketing or customer service purposes.</p>		
<b>6. Passenger data to be processed</b>	<p>The Passenger Name Record processes the passenger data mentioned in the law:</p> <ul style="list-style-type: none"> <li>- the passenger's name and Finnish personal identity number or, in the absence of such a number, date of birth and nationality</li> <li>- names and personal identity numbers of the accompanying spouse* and of minor children or, failing these, their date of birth.</li> <li>- the address of the passenger</li> <li>- date of arrival at the accommodation establishment and date of departure (if known)</li> <li>- country of arrival in Finland (if the passenger's place of residence is not Finland)</li> </ul>		

	<p>- travel document number (not required for Nordic nationals and residents of Finland)</p> <p>- optional information: whether the accommodation is for leisure, work, meetings or other reasons.</p> <p>For group travel, the following can be done a joint passenger declaration.</p> <p>* Spouse means a spouse or a person who lives with the passenger in a conjugal relationship or in a registered partnership.</p>
<p><b>7. Where to get passenger data</b></p>	<p>Passenger information is obtained from the passenger declaration, which is by the passenger or, in the case of a group trip, by the group leader is completed and signed by the tour leader.</p> <p>If the traveller fills in the passenger declaration digitally, the information is then received via the digital guest book system provider.</p>
<p><b>8. Recipients or categories of recipients of passenger data</b></p>	<p>Passenger data is not disclosed to third parties. For public authorities passenger data may be disclosed to the authorities on the basis of the law.</p> <p>According to the law on accommodation and catering activities an accommodation provider must, subject to the provisions on secrecy to provide travel data concerning a foreigner without delay to the police department of the municipality in which in which the operator's accommodation establishment is located.</p> <p>The police shall have the right to obtain information on the movements of non-nationals. passengers other than non-nationals, provided that they are necessary for the performance of police duties. necessary for the performance of police duties.</p> <p>Under the Accommodation and Catering Act the following authorities must be provided, at their request passenger information when the authority needs it in accordance with the law for the performance of official duties as further specified in the law:</p> <ul style="list-style-type: none"> <li>- Border Guard</li> <li>- Customs and Excise</li> </ul>

	<ul style="list-style-type: none"> <li>- Customs authorities Customs authorities</li> <li>- Health Protection Authority</li> <li>- Defence Forces</li> </ul>
<b>9. Transfer of data outside the EU</b>	Passenger data is not transferred outside the EU.
<b>10. 10. Retention period for passenger data</b>	<p>We store passenger data in accordance with the following rules. legislation in force.</p> <p>Passenger declarations and their data are kept for one year. one year from the date of signature of the passenger declaration. After that, they are destroyed.</p> <p>Passenger data in the Passenger Name Record will be stored for one year from the date of their entry, after which destroyed.</p> <p>According to the law on accommodation and catering activities data used for customer service and direct marketing from the register is subject to the provisions of the Personal Data Act.</p> <p>Article 29 of the Personal Data Protection Act. If the traveller has not refused the use of his/her passenger data for these purposes, the accommodation provider shall be entitled to transfer and process the passenger data after one year, also in its customer register or in any any direct marketing register.</p>
<b>11. Rights of the data subject</b>	<p>The processing of passenger data and the keeping of a Passenger Name Record are based on law. An accommodation provider may may also use passenger data for customer service and direct marketing purposes, unless the passenger has used his or her personal data for the purpose of the right of refusal referred to in Article 30 of the Personal Data Act.</p> <p><b>The passenger has the following rights when registered:</b></p> <p>The data subject's right of access to his or her own data</p> <p>The data subject has the right to request access to his/her personal data.</p> <p>The right to access data concerning oneself (=right of access) in order to find out whether data concerning oneself are being processed.</p> <p>The data subject has the right to access the data concerning him or her to check whether the passenger data concerning him or her are being processed.</p>

#### **Right to rectification of data**

The data subject has the right to obtain from the controller the rectification of  
without undue delay of the data subject's  
inaccurate and incorrect personal data concerning the data  
subject.

Only those data will be recorded in the electronic register of  
passengers,  
which is indicated in the passenger's declaration and for which the  
declaration  
is confirmed by the signature of the person who fills it in. The  
electronic register  
data entered in the electronic register of passengers are correct  
and  
complete if they correspond to those entered in the passenger  
declaration.  
The accommodation provider shall ensure that the Passenger  
Name Record is  
corresponds to the information in the passenger's statement.  
Incorrect information  
shall be corrected without delay, either on the passenger's own  
initiative or by the passenger  
at the request of the passenger.

**A request for correction by a data subject may lead to the  
Passenger Name Record  
correction of the data in the Passenger Name Record only if  
the information recorded in the register does not correspond to  
the passenger's  
information in the passenger manifest.**

#### **Right to erasure**

**Passenger data will be processed in accordance with the law for  
as long as  
the law on accommodation and catering activities for as long as  
requires. The data subject does not have the right to request the  
deletion of his/her travel data.**

**as long as the data must be kept in accordance with the law.**

The data subject may request the deletion of their data if the  
accommodation activity.  
by the operator of the accommodation uses the traveller data to  
the retention period laid down in the law for customer service or  
direct marketing purposes. In such cases, the data subject may  
request that  
the deletion of the passenger data relating to him/her without  
undue delay  
without undue delay if one of the following conditions is met:

- the personal data are no longer necessary for the purposes for which they were collected or otherwise processed
- the data subject objects to the processing of his or her travel data for customer service or direct marketing purposes
- the personal data have been unlawfully processed

Even if one of the conditions is met, the data are not necessary erasure if the processing is necessary, for example, for the controller

applicable EU or national law

processing required by law based on a national or or to comply with a legal obligation or to pursue a legal claim to establish, exercise or defend a legal claim.

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

Data subjects cannot object to the processing of their passenger data

for the purposes prescribed by law.

The data subject may, in accordance with the law on accommodation and catering.

the law on hospitality and catering services, to prohibit the use of passenger data for customer service purposes and for direct marketing when collecting data or subsequently. If the data subject objects to the use of his or her travel data

for these purposes, it will no longer be processed for these purposes.

#### **Right to request restriction of processing**

Under the GDPR, the data subject has the right to.

require the controller to restrict the processing of his or her personal data.

active processing of their personal data in specified circumstances:

- 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
- the processing is unlawful and the data subject requests the restriction of the processing instead of the erasure of the personal data
- 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; or
- the data subject has objected to the processing of the personal data and the assessment of whether the legitimate grounds of the controller override those of the data subject is pending.

	<p>During the period of restriction of processing, the data may in principle be only be retained. The data may also be processed for legal for the establishment, exercise or defence of legal claims or to enforce the rights of another natural or legal person or for the protection of an important public interest reasons of public interest. Before the restriction on processing is lifted, it must be notified to the data subject.</p> <p><b>The processing of passenger data is based on the law and it defines the purposes for which passenger data is used and for which authorities to which data will be disclosed. The data subject's right to request a restriction of processing cannot therefore lead to a situation where the legal provisions on the processing of passenger data processing would not be complied with.</b></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 is. has not complied with the applicable data protection regulation.</p>
<p><b>13. Requests relating to the exercise of the rights of the data subject</b></p>	<p>For questions relating to the processing of passenger data and situations relating to the exercise of the data subject's rights. may contact the controller mentioned in point 2 contact person of the controller.</p> <p>A request for the right of access or any other request by the data subject exercise of the rights of the data subject to the controller must be made in writing, either by e-mail or by post. The request may also be made in person at the following address of the controller at the registered office of the controller.</p> <p>The controller may ask the data subject to specify in an adequate manner what data or processing operations the data subject the data subject's request concerns.</p> <p>In order to ensure that passenger data are not disclosed to the data subject. rights of the data subject is not disclosed to a third party to the data subject, the controller may, where necessary</p>

	<p>request the data subject to submit a signed request for verification.</p> <p>The controller may also ask the applicant to prove his identity by means of an official identity document or other reliable means.</p>
<b>14. Updating the register</b>	<p>The Passenger Name Record has been updated on 16.10.2023 by the Data Protection Ombudsman.</p>