

Description of file under section 10 of the Finnish Personal Data Act (523/99)

### **1. CONTROLLER**

RALLA Oy  
Säynäsentie 607  
FI-44440 Rautalampi, Finland  
Tel. +358405689206

### **2. CONTACT PERSON FOR REGISTER-RELATED MATTERS**

Tiina Lautamo  
Ralla Oy  
Tel. +358405689206

### **3. NAME OF THE REGISTER**

Ralla Oy Customer Register and RALLA application register

### **4. PURPOSE OF PERSONAL DATA PROCESSING**

The purpose of processing consists the maintenance of customer relationships, the realization of the rights of the customers and Ralla Oy, and the processing of personal data under the Personal Data Act for purposes related to the provision of the RALLA online service.

Personal data may be processed for the following purposes:

- Provision of advice to customers
- Provision and realization of the service
- Communication related to the service
- Customer invoicing
- Collection and processing of customer feedback and information related to customer satisfaction
- Development of the controller's business operations and the development of related customer service
- The processing activities may be outsourced to external service providers under the data protection legislation within the limits imposed thereof.
- Additionally, statistics and analysis of data related to the use of the RALLA application.
- The processing of data that is considered sensitive will only be performed with the explicit consent of the user customer.

## **5. DATA CONTENTS OF THE REGISTER**

The Customer Register includes customer data according to the following groupings:

- Contact information of the service's user customers (name, email, address) for contact purposes
- Identification data (user ID)
- Information on the establishment and conclusion of the customer relationship

The RALLA application register includes customer data according to the following groupings:

- The name of the application's user company, names and user IDs of the users.
- Name and date of birth (month and year) of the child.
- Content produced by the registered user, such as observation data pertaining to the child.

## **6. REGULAR SOURCES OF INFORMATION**

Data is sourced from the information collected from the user customers during registration to the services and throughout the customer relationship. The RALLA application register is created during the use of the RALLA application in the form of the data pertaining to the child recorded by the user customer themselves. The observation of the child is primarily conducted as part of the normal working practices of early childhood education and care or rehabilitation (taking into account section 8(1)(1) of the Personal Data Act).

## **7. REGULAR DISCLOSURE OF DATA**

The RALLA application data is covered by the obligation of secrecy. The data is processed by a person subject to obligation of confidentiality, which remains in effect after the customer relationship is concluded. Personal data will only be disclosed to entitled authorities based on a specific request for information. The user customer/company of the RALLA service is responsible for their part for the maintenance and archival of any register created by them.

If disclosure of data in the customer register outside of Ralla Oy becomes relevant, appropriate consent will be obtained from the Customers in advance. Customer data will not be disclosed outside of the European Union or the European Economic Area.

## **8. DELETION OF DATA**

Data may be deleted at the request of a user customer or due to the conclusion of a customer relationship. Additionally, it may be necessary to delete data as a result of monitoring if a customer is abusing the service or using the service to engage in criminal activities etc.

If data that is incorrect, unnecessary, incomplete or expired for the purposes of processing is found in the register, an employee with access will rectify the data either on his or her own initiative or at the request of a data subject (Personal Data Act section 29).

## **9. PRINCIPLES OF REGISTER PROTECTION**

Personal data is kept confidential. Ralla Oy's data network and equipment, on which the register is located, is protected by a firewall and other technical measures, such as encryption.

The digital material can only be accessed by authorized employees using personal user IDs and passwords. There are varying levels of access and each user is provided access rights that are sufficient for performing their duties, but which are as limited as possible. The data is located within the controller's or their subcontractor's closed network, which is protected by a firewall.

The retention period of data is determined by the duration of the user customer's customer relationship. After the customer relationship is concluded, the user customer is responsible for archiving the data they have entered into the RALLA application register. The RALLA application's expired data is deleted in a secure manner within six months of the conclusion of the customer relationship.

## **10. RIGHT TO PROHIBIT PROCESSING**

User customers have the right to prohibit handing over or processing data pertaining to them for mail marketing, remote sales, and other forms of direct marketing.

## **11. RIGHT TO DEMAND CORRECTIONS TO DATA**

A data subject has the right to request correction of data from the contact person for register-related matters or the person responsible for the register. If the request is denied, the contact person or the person responsible for the register will provide a written statement to the data subject, which also specifies the reasons for which the request was denied. The data subject may bring the matter to the Data Security Ombudsman.

## **12 OTHER RIGHTS RELATED TO THE PROCESSING OF PERSONAL DATA**

The privacy police is available on RALLA Oy's website: [www.ralla.fi](http://www.ralla.fi)