

# Privacy policy in accordance with the General Data Protection Regulation (EU/679/2016)

## 1. Controller

RB Consult Ab Oy (business ID 2693051-3), [info@makeitout.fi](mailto:info@makeitout.fi)

Teräksenkuja 3, 65100 Vaasa

Contact person: Robin Bäckström

## 2. Register

RB Consult Ab Oy:s customer information register

## 3. Purposes and lawful basis for processing

Personal data may be processed for the following purposes with corresponding lawful grounds in parenthesis:

- handling and improvement of customer relations (legitimate interest),
- service execution (general terms),
- ensuring and reminding of customer event (general terms and legitimate interest),
- invoicing (general terms),
- debt collection (legitimate interest),
- marketing (legitimate interest and in some cases consent (e.g. electronic direct marketing to consumers and posting of pictures on the controller's Facebook page)),
- analysis and statistics (legitimate interest),
- opinion- and marketing surveys (legitimate interest),
- settlement of possible dispute in case of material or immaterial damage (legitimate interest) and
- troubleshooting of the games' control systems (general terms and legitimate interest).

## 4. Data content of the register

The following data is recorded into the register: name, phone number, e-mail address, made booking, game language and other data relating to the booked game (such as booked game, scheduling of the booked game, number of participants and length of the booked game), consent (e.g. to electronic direct marketing) and camera surveillance recordings. The controller also processes statistical personal data of the controller's Facebook page visitors and their activities therein.

## 5. Encryption of the register

Processing of the register is encrypted with passwords and secure channels. Also data transmission during bookings is executed over a secure channel. The servers providing the service are located in a locked and guarded facility.

Only those officials of RB Consult Ab Oy who in line with their work scope have the necessary user ID's and passwords and are allowed to process the register can and will access the register.

## 6. The rights of the data subject

You have the right to request access to your personal data as well as rectification and erasure of your personal data. You also have the right to request restriction of and to object to the processing of your personal data. Further, you have the right to data portability. The scope of such rights is determined according to the general data protection regulation and other applicable legislation.

You have the right to lodge a complaint against the controller's processing of personal data with the supervisory authority. The authority supervising the controller's processing of personal data in Finland is the Office of the Data Protection Ombudsman ([www.tietosuoja.fi](http://www.tietosuoja.fi)). You may also lodge a complaint with the supervisory authority in your country of residence.

## 7. Cookies

The Slotti booking system uses cookies to identify the user's session. By using the service you give your consent to the use of cookies. Additional info on cookies are found on the web page of the [Finnish Communications Regulatory Authority](#). For generating statistical personal data, cookies are stored on the visitor's device from visits on the Facebook page.

## 8. Storage period

Personal data are stored as long as they are needed for the purpose for which they were originally collected. Additionally, personal data are thereafter stored as long as needed for settlement of possible legal claims. For example, personal data relating to an executed game are stored at least ten years after said game, and personal data relating to handling and improvement of customer relations are stored at least ten years after the client relationship has been terminated. With regards to the camera surveillance recordings, the purpose is considered fulfilled after two years after each executed game whereupon the recordings are deleted. In addition, the controller adheres to other applicable legislation that regulates storage time, e.g. legislation on accounting.

## 9. Consents

The processing of certain personal data is based on consent. In such cases you always have the right to withdraw your consent.

## 10. Categories of recipients

The controller mainly processes personal data within the company and for its own purposes. However, certain situations require that personal data is disclosed to third parties.

## 11. Sources

Personal data is first and foremost collected from yourself, e.g. when making a booking. Personal data is also generated by your own activities on e.g. the controller's web page, Facebook page and booking system. In some cases the controller may collect personal data from third parties, e.g. commercial contact information registers (such as Fonecta and Osoitetalo).

## 12. Transfer of personal data outside the EEA

Personal data is mainly processed within the EU and the EEA; however, due to technical reasons, certain personal data may need to be transfer to third countries where the level of personal data protection may be lower than within the EU and the EEA. If an adequacy decision by the EU Commission would be absent for this third country, the personal data protection is ensured by other appropriate safeguards. Such safeguards are principally standard data protection clauses adopted by the EU Commission, and you will find mote information on the matter at [https://ec.europa.eu/info/law/law-topic/data-protection\\_en](https://ec.europa.eu/info/law/law-topic/data-protection_en).