

Privacy Notice for Waste Management Personal Data Registers

This Privacy Notice has been prepared by Ab Stormossen Oy in accordance with the EU General Data Protection Regulation (2016/679), outlining the processing of personal data and the rights of the data subject.

1. Register Name

Ab Stormossen Oy's Personal Data Register

2. Data Controller

Ab Stormossen Oy, business ID 0586634-8

Stormossenintie 56, 66530 Koivulahti, FINLAND

Tel. 010 320 7600

E-mail: info@stormossen.fi

3. Contact Persons for Register Matters

Organized waste collection, eco-charges:

Satu Mäenpää, Financial Assistant

Tel. 010 320 7614

E-mail: satu.maenpaa@stormossen.fi

Waste reception customers, customer and refueling cards:

Maria Wikberg-Jatta, Financial Assistant

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4. Purpose and Legal Basis for Processing Personal Data

Ab Stormossen Oy is a waste management company owned by municipalities, to which the municipalities have transferred the implementation of waste management services in accordance with the Waste Act. Stormossen manages the practical organization of waste management on behalf of its municipalities.

Stormossen handles waste reception and processing, customer service, and invoicing. In addition, Stormossen refines the biogas it produces into transportation gas, which is sold at Stormossen's public gas refueling stations.

In accordance with the Waste Act and municipal waste management regulations, all residential and leisure properties as well as public administration and service facilities must be included in organized waste management. Information on waste management arrangements for these properties is stored in the waste management personal data register. The basic waste management fee ("eco-charge") is collected throughout Stormossen's operational area.

Based on the data stored in the personal data register, Stormossen ensures the provision of waste management services and prepares invoicing. Personal data is collected, among other things, for the correct allocation of payments, customer identification, verification of customer interaction history and rights, reporting, and communication. The personal data register also includes information about private individuals, transportation companies, business customers, and public customers as well as their representatives who visit waste reception sites. The information is used for waste bringer identification, invoicing, waste accounting and monitoring, as well as communication and guidance.

The information in the waste management personal data register is also used for contract management, customer service situations, as well as advisory and information tasks.

Personal data is processed for sending disruption, announcement, and news messages and for handling tasks related to these (customer communication).

Personal data is processed for research, customer surveys, and events organized by Stormossen. This information is used for service development.

The data in the personal data register is also used for statistical purposes, e.g. to describe the extent of operations or the number of customers. Statistical information cannot be identified as relating to individual persons.

Vaasa Region Waste Board approves billing lists based on the personal data register. The Board also processes objections regarding public-law waste fees and decides on possible reasonable adjustments to waste fees.

Legal Bases:

The legal bases for processing personal data are compliance with legal obligations (Article 6(1)(c) of the EU General Data Protection Regulation), legitimate interests, contractual relationship, or consent of the data subject.

5. Register Content

Basic Information

Personal data

- first name and last name
- date of birth (natural persons)
- business ID (legal entities, also real estate partnerships)
- contact person or legal guardian's name and contact details
- mailing address
- phone number
- e-mail
- bank account details, online or e-invoice information

Waste Fee Customers

Information related to the customer relationship

- customer number
- language of service
- waste management organization form
- waste transportation company
- invoice history
- property-specific waste collection event information
- possible official decisions
- number of household members

- contact person or property manager information
- possible composting information

Property and Building Information

- building address
- permanent building identifier
- property identifier
- property name
- purpose and status of building use
- number of apartments
- central coordinates of the building or waste container

Holders of Recycling Center Customer Cards: Private Individuals, Companies, and Public Customers

- card number
- visits to recycling stations (location and time)
- purchased product or service

Waste Reception Customers

Billing customer and transportation companies of waste reception

- customer number
- names of the customer and the transportation company
- business ID
- vehicle registration number
- details related to waste reception (type of waste, quantity, time, reception/treatment location)
- e-mail
- billing address or e-invoice information

Waste producer

- waste pick-up location details as per the transportation company's notification (e.g. name of the company or customer, address, municipality)

Gas Refueling Card Customers

- card number
- refueling events (station, time, amount of gas refueled)
- business ID
- contact person's name and contact details
- billing address or e-invoice information

Other possible additional information provided by the customer, customer feedback, and notes related to the customer relationship.

6. Regular Sources of Information

Register maintenance is primarily based on information obtained from customers. Changes are acknowledged from the date of notification.

Other regular sources of information include:

- the Property Information Service based on the Property Information System (KTJ) maintained by the National Land Survey of Finland;

- the Building and Dwelling Register based on the Population Information System (VTJ) maintained by the Digital and Population Data Services Agency (DVV);
- the search service of the Business Information System (YTJ) maintained jointly by the Finnish Patent and Registration Office and the Tax Administration;
- Posti's address system;
- parties managing debt collection services, telephone companies' contact directories, and other public registers.

7. Recipients of Information

Upon a separate request, information in the register can only be disclosed to authorities and the police, but only to the extent necessary for the performance of a task based on law.

The waste management authority (Vaasa Region Waste Board) has limited access rights to the personal data register. To the extent that the register pertains to the marking of self-managed bio-waste treatment or composting according to Section 41, Subsection 2 of the Waste Act, the municipal waste management authority must maintain a register of this. The waste management authority is the controller of the register as far as it concerns self-managed bio-waste treatment at properties. Stormossen has access rights to the register. For other parts of the register, the waste management authority (Vaasa Region Waste Board) has limited access rights to the personal data register, for example, for processing municipal waste fee reminders and monitoring waste streams according to waste management regulations.

Municipal environmental protection authorities, which are responsible for waste management supervision (Section 24 of the Waste Act, Chapter 2 of the Act on Municipal Environmental Protection Administration 64/1986), may be given limited viewing rights to the register for waste management supervision tasks.

Stormossen may transfer personal data to its partners and subcontractors. These may process personal data only for tasks related to managing or maintaining the customer relationship on behalf of Stormossen. Stormossen always ensures that partners and subcontractors do not process the transferred personal data for any other purposes.

If a property is connected to a communal waste container ("shared container"), the customer's name, billing address, and other possible contact details, as well as the property or building address, building/property identifier, and building usage information, composting information, and the share of the property in the communal arrangement, can be disclosed to the contact person of the shared container as well as to all shareholders of the said communal arrangement. Similarly, the contact person of the shared container is provided with information about a shareholder leaving the communal arrangement, as well as their property/building address.

Information is not disclosed for direct marketing purposes.

8. Transfer of Data Outside the EU or EEA

Data is not transferred outside the EU or EEA.

9. Retention Period of Personal Data

Data collected in the register is retained only as long as and to the extent necessary in relation to the original or compatible purposes for which the personal data was collected. The personal data described in this Privacy Notice is kept for as long as the data controller utilizes the data for the purposes described in Section 4. Personal data stored in the register is deleted when there is no longer a legal basis for its processing.

10. Principles of Register Protection

The information security of the register and the confidentiality, integrity, and availability of personal data are ensured with appropriate technical and organizational measures.

Manual materials related to the register are stored in secure locations. Digitally stored and processed data are in databases that are protected with firewalls, passwords, and other technical means. The databases are located in controlled environments, and access is limited to individuals who need to use the information based on their job responsibilities.

The data controller's employees process personal data in compliance with applicable data protection legislation. We may also outsource the processing of personal data to a third party, ensuring through contractual arrangements that personal data is processed in accordance with current data protection legislation and these data protection practices. Such third parties may include system providers.

11. Right of Access and Rectification

The data subject has the right to inspect what personal data about them is stored in the register. Requests for access or rectification should be made in writing to the person responsible for the register data via customer service.

12. Right to Erasure

The data subject has the right to have their personal data erased without undue delay, provided that:

- the personal data is no longer needed for the purposes for which they were collected or otherwise processed;
- the data subject withdraws consent on which the processing is based, and there is no other legal ground for the processing;
- the personal data has been unlawfully processed; or
- the personal data must be erased to comply with a legal obligation in Union or national law.

13. Right to Restriction of Processing

The data subject has the right to obtain from the data controller restriction of processing if:

- the accuracy of the personal data is contested by the data subject;

- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the data controller no longer needs the personal data for the processing purposes, but the data subject requires them for the establishment, exercise, or defense of legal claims.

14. Right to Withdraw Consent

The collection of data in the personal data register is not primarily based on consent requested from the customer but on legislation or a contract with the customer.

The processing of personal data does not require the data subject's separate consent.

The data subject has the right to withdraw their consent for processing at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

15. Right to Data Portability

The data subject has the right to receive their personal data, which they have provided to the data controller, in a structured, commonly used, and machine-readable format, and have the right to transmit those data to another data controller.

16. Right to Lodge a Complaint with a Supervisory Authority

The data subject has the right to lodge a complaint with a supervisory authority if they consider that the processing of personal data relating to them infringes the applicable data protection regulations.