

HSL CUSTOMER REGISTER PRIVACY STATEMENT

Privacy statement

Personal Data Act (523/1999) Sections 10 and 24

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The privacy policy applies to the users of the city bike service.

1 CONTROLLER OF THE DATA FILE

The name of the data file is HSL's customer register ("Customer Register") and its data subjects consist of individuals who use HSL's services ("Customers"). The controller of the data file is Helsinki Regional Transport Authority (hereinafter HSL) (business ID 22745863).

Address: Opastinsilta 6 A 00520 HELSINKI, FINLAND. The contact person for matters related to the data file is Laura Sundell.

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2 PURPOSE OF THE PROCESSING OF PERSONAL DATA

The main purpose of processing the data in HSL's Customer Register is the provision of transport services.

HSL's Customer Register consists of the following sub-registers for different services:

- Travel Card (HSL card) users
- Users of applications offered by HSL (such as HSL app and Mobile ticket app)
- HSL account users
- Users of HSL's website and the services offered on them
- SMS ticket users
- City bike users
- HSL feedback system users

HSL arranges public transport in accordance with the Act on Cooperation Between Municipalities in the Helsinki Metropolitan Area in Waste Management and Public Transport (829/2009, "[yhteistoimintavelvoitelaki](#)"). The various services can be personalized or used anonymously, without personal data. However, the processing of customer data requires the customer to start using one or more of the services specified above. The customer's personal data will be registered in connection with adopting the service. HSL's various services are partly based on the same technical systems and base data, and customer data is shared by different services in this respect. In addition, other service-specific data can be interconnected.

3 CONTENT OF THE DATA FILE

The Customer Register consists of several types of personal data. More detailed information on the data protection of HSL's various services is available on the pages of the services.

- (a) **The customer's base data** such as the name, address, e-mail address, telephone number, customer identifiers such as customer number and **identification information**

in different extents, from strong electronic authentication (standard data content from the Population Register Centre) to user names and passwords chosen by the users is used by us to identify customers and offer services to them through various media and modes of transport.

- (b) **Identifying information concerning the customer's Travel Card** such as card number.
- (c) **Special information provided by the customer** such as the "Entitled to a companion" data item and authorization data item.
- (d) **Some data related to HSL's obligations as a service provider** are transferred to us in connection with strong authentication, including the municipality of residence, authorization and security prohibition data items.
- (e) **Data related to the customer type** such as customer group and category and various account, service use, order and service information.
- (f) Purchase history by **service**.
- (g) **Information on content use and communications through the various channels**, including the content, identification and technical data on phone calls, cookies and other communications channels.
- (h) **Information saved by the customer in various media** such as route and area choices; customer feedback information such as text, images and contact details, and customer-generated content such as customer panel and survey data.
- (i) **Boarding data** such as information on validating tickets and getting on board vehicles, collected and aggregated for determining the municipal contributions of HSL's joint local authority. Boarding data will only be stored as personal data for the time required to validate tickets and perform other functions essential to the public transport system. After these functions have been performed, identifying data is removed from the data.
- (j) **Travel data** (including terminal device location) is only collected subject to the explicit consent of customers and used for service localization (such as the use of the Journey Planner at the customer's location), targeted disruption information, customer communications and marketing and, possibly, for ticket monitoring subject to a separate investigation. Customers give and withdraw their consent for the processing of travel data at their own volition.
- (k) **City bike use data** such as use history (station of origin and destination, time/date, kilometers) and the information that the individual is currently using a bike (collection time).
- (l) **Payment data** in various channels.
- (m) **Permissions, prohibitions and similar data**.
- (n) **Feedback information** from customer feedback submitted.

4 PROCESSING OF PERSONAL DATA

The main purpose of processing personal data is the provision of transport services. This includes the following functions in which personal data is processed:

- **Service provision** including the sale, use, validation and inspection of tickets/travel services and corresponding tasks related to the journey (ticket data, payment data, base data and mode-specific data).

- **Account management** such as customer service, agreement management, clearing up ambiguities and other use of personal data for administrative purposes.
- **Customer communications** such as disruption alerts, bulletins and newsletters and related subscriptions (travel data, if permitted by the user).
- **Marketing communications** subject to the customer's consent (data subjects who have given a marketing permission). Customers have the right to prohibit the use of their data for direct marketing by notifying HSL's customer service and customers can withdraw their electronic marketing permissions themselves.
- **Municipality of residence data related to public transport duties** such as determining the municipal shares of ticket revenue and operating expenses, verification of tariff subsidy rights and the compilation of statistics in accordance with the charter referred to in the Local Government Act (410/2015).
- **Development of services** including load studies and the analysis of total trips and trip chains, the development of the transport system, routes and route networks, and digital service development.

Where possible, municipality of residence data and data related to the development of services will be processed in a form that prevents the identification of individuals.

5 SERVICE PERSONALIZATION AND PROFILING

As part of processing the personal data saved in the Customer Register, HSL can use the data collected on customers for profiling and personalization purposes. Personalization is based on defining the customer's segment based on various criteria known about the customer (e.g. what services the customer uses).

Customer segments can be created for different purposes related to business operations. Such purposes based on personalization include the personalization of marketing communications for customers who have given a marketing permission and traffic event information based, for example, on location or the residential area reported.

The data created by profiling is not disclosed to third parties outside the service chain without the customer's explicit consent. Customers always have the right to prohibit the processing of their personal data created by profiling, for purposes related to direct marketing. Customers can withdraw their direct marketing consent without limitations.

6 LEGAL BASIS FOR PROCESSING

The personal data is processed on the following legal basis:

- (a) Processing is necessary for the execution of an agreement to which the data subject is party or for the implementation of preliminary measures for concluding an agreement at the request of the data subject:
 - Service delivery to customers.
 - The installation and appropriate use of HSL's applications, along with registration for and appropriate use of browser-based online services.
 - The use of HSL's various websites by unregistered users.
- (b) The explicit consent of the data subject (that can be withdrawn by the customer at any time):
 - For individual services, the further use of travel data beyond what is required for the implementation of payment transactions and the execution of the agreement and immediate measures connected to such implementation (such as the validation of

tickets). Such further use may include, for example, the use of use history data between service-specific sub-registers.

- The use of travel data.
- The use of the feedback system.
- The explicit consent of the data subject to the processing of his/her personal identity number, if it is used for purposes of identification.
- The disclosure of information related to special rights when such rights are used to grant special services to the customer.
- The guardian's consent for the processing of the personal data of children.

- (c) The processing of municipality of residence data and certain travel data is based on the Act on cooperation of municipalities in the Helsinki Metropolitan Area on waste management and public transport (829/2009), and HSL implements the processing under the charter provided for in the Local Government Act (410/2015) in order to allocate costs according to the use of public transport services.

7 REGULAR SOURCES OF INFORMATION

Personal data is primarily collected directly from the customer, and the collection takes place in connection with the adoption of, registration for and customer service related to the services specified in section 2.

Other regular sources of data for the HSL Customer Register include:

- **Data related to mobile service use and the identification of third parties:** Data on customers can also be obtained in connection with the use of HSL's online and mobile services, including data related to the use of third-party identification and authentication tools and services.
- **Base data updates from services that offer them:** Personal data can also be collected, stored and updated from controllers that offer address, update or other such services, and information on residential areas and accounts can be obtained from services that offer them. Personal data is obtained from the population information system in connection with checking the municipality of residence.
- **Actual usage data** is collected according to the use of each service.
- **Data obtained from the city bike service** such as city bike use data.
- **Travel data** is collected using, for example, card readers, location data and DTE.
- **Boarding data** is collected on passengers boarding vehicles, e.g. from the Travel Card reader.
- Data related to mobile is received from operators.
- Data transferred to HSL **from the customer registers of MaaS partners.**

8 COOKIES AND OTHER SIMILAR TECHNIQUES

Cookies are small text files stored by your browser on your computer, tablet or mobile phone. Your browser downloads the cookies every time you visit a website. Cookies contain a unique identifier that allow the site to identify users. The mobile app uses a corresponding numeric identifier similar to cookies.

HSL uses cookies to implement services and facilitate their use. Users cannot be identified by the use of cookies. In addition, cookies and the data collected via them are used to analyze the usability and use of the service, improve security, monitor service use and to develop the service. Cookies can also be used to develop targeted communications and content.

The user can accept or decline the use of cookies by changing browser settings. Cookies are necessary for the performance of some of HSL's services. Certain cookies remain on the user's computer even after closing the site. The cookies may remain on the user's computer for months or years, until deleted manually.

9 PERSONAL DATA STORAGE PERIOD

HSL applies the following principles to the storage period:

- (a) **Ticket purchase data and other information related to payment transactions** will be stored for the period required by applicable law, such as the Accounting Act (1997/1336), in addition to a four-month clearance period.
- (b) **Base account data** will be stored will be stored for the duration of the customer relationship and after that, for as long as necessary to fulfill the rights and obligations of the parties.
- (c) **Data specific to individual services** will be stored in accordance with service-specific principles.
- (d) Travel data will be stored with the customer's consent until the customer requests that they are deleted.
- (e) **Data concerning city bikes** will be stored for the duration of service use and as long as necessary.
- (f) **Feedback-related data** will be stored for two (2) years and after that, for as long as necessary to fulfill the rights and obligations of the parties.
- (g) **Aggregated boarding data related to the ticketing system** will be stored for as long as necessary for the planning of new routes and route changes in the long-term monitoring of route use.

In addition to the principles stated above, HSL will, as a rule, store personal data for a maximum of two (2), unless there are justified grounds for a longer storage period.

HSL reviews the necessity of storing data on an annual basis and deletes data if there are no grounds for storing it. In addition, HSL will implement all reasonable measures for ensuring the immediate deletion or correction of data that is inaccurate, erroneous or obsolete for purposes of processing.

10 RECIPIENTS OF PERSONAL DATA AND REGULAR DISCLOSURE OF DATA

HSL can use contract partners working on behalf of HSL for the technical, commercial or operational implementation of data-processing tasks, and can disclose personal data to them within the scope of such cooperation and subject to the data protection agreement.

When required, personal data contained in the register will be disclosed to external persons or organizations as follows:

- (a) For the provision of services to payment service partners;
- (b) In the case of city bikes, to HKL and the City of Espoo, which are joint controllers of the city bike register;
- (c) For the delivery of feedback to parties responsible for making the corrections related to the feedback received by HSL.
- (d) HSL can disclose customer data to authorities as permitted and required by legislation.

11 TRANSFER OF DATA TO OUTSIDE THE EUROPEAN UNION OR THE EUROPEAN ECONOMIC AREA

No personal data is transferred from the register to outside the European Union or the European Economic Area. HSL nevertheless reserves the opportunity to make such transfers to future business partners, subject to the statutory procedures applied to the countries in question.

12 PRINCIPLES OF DATA SECURITY

The data of customers is secured as follows:

- (a) Agreements for securing the Customer Register have been made between the controller and system suppliers.
- (b) The controller's employees and other personnel have undertaken to maintain professional secrecy and the confidentiality of the data they have obtained in connection with the processing of personal data.
- (c) System suppliers manage the register and related storage of data in accordance with good data processing practice and are subject to strict professional secrecy.
- (d) The security of the controller's Customer Register and confidentiality of personal data is ensured through appropriate technical and administrative measures in accordance with good data processing practice, and obsolete personal data is regularly deleted, either through anonymization or permanently.
- (e) The controller has restricted the access rights and authorizations to data systems and other storage platforms, so that only the personnel required for the legal processing of the data is able to view and process it. Only employees whose duties involve processing customer data are authorized to use the system containing the data. Every user logs into the system with personal credentials provided in connection with granting access rights to the system. The access rights will expire when the person is no longer responsible for the tasks for which they were granted.
- (f) The controller has restricted the access rights and authorizations to data systems and other storage platforms, so that only the personnel required for the legal processing of the data is able to view and process it. In addition, all database and system use events are registered in the controller's IT system log; Log data on how customer data was processed is collected into HSL's customer data system in connection with processing.
- (g) The data is compiled into logically and physically secured databases. The databases and their backups are located on locked premises, and only designated personnel are permitted to access the data. The data has been secured in accordance with the Information Society Code and the regulations and guidelines of the Finnish Communications Regulatory Authority.

13 RIGHTS OF DATA SUBJECTS

Data subjects have the following rights under the Personal Data Act:

- a) The right to know what data has been stored on them in the personal data file, or that the file contains no information on them as well as the regular sources of information and for what purposes the data in the file are used and regularly disclosed.
- b) The right to demand the correction, deletion or completion of personal data in the file that is erroneous, unnecessary, incomplete or expired for purposes of processing.

- c) The right to prohibit the controller from processing their data for purposes of direct advertising, distance selling and other direct marketing, and for market surveys and polls.

From 25 May 2018, data subjects have the following rights under the EU's General Data Protection Regulation:

- d) The right obtain from the controller confirmation as to whether or not personal data concerning them are being processed, and, where such personal data are being processed, access to the personal data and certain data specified in the EU's General Data Protection Regulation.
- e) The right to object data processing for certain purposes specified in the EU's General Data Protection Regulation, such as direct marketing.
- f) The right to withdraw their consent at any time with no impact on the legality of processing performed by virtue of the consent before its withdrawal.
- g) The right to demand the controller to correct inaccurate and incorrect personal data concerning the data subject without undue delay, and to have incomplete personal data completed.
- h) The right to have the controller delete the personal data concerning the data subject without undue delay in the situations specified in the EU's General Data Protection Regulation.
- i) The right to have the controller limit the processing of the personal data in the situations specified in the EU's General Data Protection Regulation.
- j) In certain cases specified in the EU's General Data Protection Regulation, the right to access to personal data concerning them, which they provided to a controller in a structured, commonly used and machine-readable format and to transmit this data to another controller without hindrance from the controller to which the personal data have been provided.
- k) The right to lodge a complaint with a supervisory authority if the data subject considers that the processing of his or her personal data is in violation of the EU's General Data Protection Regulation.

Requests concerning the exercise of the rights of data subjects should be addressed to the controller's contact person specified in section 1.

14 AMENDMENTS

HSL's data protection policy constitutes a part of the services offered by HSL and the other terms and conditions between the customer and HSL. HSL can make amendments to this privacy statement by announcing the changes through application notifications, announcements published on websites, by e-mail or by notifications provided at service points or in connection with updates.