

Privacy Policy

21st March 2025

1. Controller

Sponda Ltd (business ID: 0866692-3)
Yrjönkatu 29 C, P.O. box 940, FI-00101 Helsinki
tel. +358 (0)20 43131

2. Contact details for register matters

Sponda Ltd
Yrjönkatu 29 C, P.O. box 940, FI-00101 Helsinki
tel. +358 (0)20 43131
e-mail: privacy@sponda.fi

3. Name of the register

Shopping centers' customer feedbacks

4. Purpose and legal basis of the processing of personal data

The purpose of the processing of personal data is to process the customer feedbacks and response to persons giving a feedback.

The legal basis for the processing of personal data is primarily the controller's legitimate interest. In cases where the legal basis for the processing is a legitimate interest, the interest refers to the controller's needs to develop shopping centers and shopping centers' services.

The controller may use external service providers to carry out certain processing activities described in this policy.

5. Data content of the register

The following data can be saved of data subjects:

- first name and last name
- e-mail address
- other possible personal data written on the feedback form

6. Storage period of personal data

The data stored in the register may be stored for as long as necessary for the original purpose of the collection and processing, or for as long as required by the law and regulations.

7. Regular sources of data

The personal data collected for the register come directly from the data subject as part of the giving feedback.

8. Regular disclosure of data and recipient categories

Personal data may be disclosed between the group companies of the controller. Personal data may be disclosed in connection with the sale, transfer or other disposal of a site or business.

Personal data may be disclosed to the controller's and/or its group company's service providers.

Personal data may be disclosed to competent authorities, for example, in order to identify misuse and in order to help them carry out their statutory duties.

9. Transfer of data outside the EU or the EEA

Personal data may be transferred outside the European Union or the European Economic Area in accordance with and within the limits of data protection law.

The controller, the controller's subcontractors or partners may use companies that are located outside the EU or the EEA to assist in the processing of personal data, or they may use workforce or other resources that are located outside the EU or the EEA for processing personal data. It is also possible that a co-operation partner selected by the controller to which the controller decides to transfer data is located outside the European Union or the European Economic Area, for example, in the United States. The legislation of non-EU/EEA countries does not necessarily provide the same level of protection for personal data as the European Union. However, the controller tries to ensure the protection of personal data in these cases by using the safeguards required under data protection law, such as the standard contractual clauses of the European Commission.

10. Protection principles of the register

Manual material

Any manual materials are stored in a locked room that only authorised persons can access.

Electronically processed data

The register is stored in electronic form, appropriately protected from outsiders with the help of firewalls and other technical measures. Only designated employees of the controller and representatives of partners have the right to process the data stored in the register.

The aim of the measures described above is to safeguard the confidentiality, availability and integrity of the personal data stored in the register and to permit the exercise of the data subject's rights.

11. Automatic decision-making

Personal data is not used for automatic decision-making that would have legal or other similar effects on data subjects.

12. Right to object to the processing of one's personal data

Where the grounds for the processing of personal data is the legitimate interest of the controller, the data subject has the right to object to the profiling or other processing of any personal data relating to their particular situation.

The data subject may object to the processing of their personal data by submitting a request, as described in section 15 of this privacy policy. In the request, the data subject must specify the particular situation on the basis of which they object to the processing. The controller may refuse to satisfy the request under the criteria set out in legislation.

13. Right to object to direct marketing

The data subject may give their consent or refusal to direct marketing to the controller channel-specifically, and the content or refusal also covers profiling for direct marketing purposes.

14. Other rights of the data subject related to the processing of personal data

Right of access to personal data

The data subject has the right to access their personal data in the register. The access request must be made following the instructions set out in this privacy policy. The right of access can be refused on the grounds provided for in legislation. In principle, exercising the right of access is free of charge.

Right to request rectification or erasure of personal data or restriction of processing

The data subject must, without undue delay and after noticing or becoming aware of the mistake, rectify, erase or complement any data in the register that violates the purpose of the register, is incorrect, unnecessary, incomplete or outdated, if the data subject can do this him- or herself.

If the data subject cannot rectify the data, the rectification request must be submitted as described in section 15 of this privacy policy.

In addition, the data subject has the right to request the controller to restrict the processing of their personal data, for example, while the data subject is waiting for the controller's response to the rectification or erasure request.

Right to move data between systems

Insofar as the data subject has submitted data to the register that is processed on the basis of the data subject's consent, the data subject has the right to receive such data in a form that is readable by a computer and move them to another controller's system.

Right to lodge a complaint with a supervisory authority

The data subject has the right to lodge a complaint with a competent supervisory authority of the controller has not complied with applicable data protection regulations in its operations.

15. Contacts

The data subject should contact the controller if they have any questions concerning the processing of personal data and the exercise of their rights. The data subject may exercise this right by sending a request to the controller via e-mail to privacy@sponda.fi or by mail to Sponda Ltd, Yrjönkatu 29 C, P.O. Box 940, FI-00101 Helsinki.