

# DIGITAL PRIVACY POLICY

As a visitor on our websites and a user of the services provided by Åland Post Ltd ("Åland Post") on the websites, our social media platforms and by our customer service (in this policy called "digital services"), you can be assured that Åland Post takes your privacy seriously. This digital privacy policy applies generally to all Åland Post's digital services, unless otherwise is specified in respect of the provision of a particular service.

The personal data processed by Åland Post is used only for its intended purpose and is protected against unauthorised access. All processing of personal data at Åland Post is carried out in accordance with the General Data Protection Regulation (GDPR)<sup>1</sup>.

In addition to the processing of personal data, which is carried out via Åland Post's digital services, Åland Post also processes personal data, both about you as sender and recipient, when performing the services Åland Post provides via digital services. In the event that the terms and conditions of any of the services provided via Åland Post's digital services contains more specific provisions concerning personal data processing, such provisions take precedence over this digital privacy policy for the relevant service.

## 1. Personal data and the processing thereof

*Personal data* is any information relating to an identified or identifiable natural person, wherein an identifiable natural person is a person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data or online identifiers, or one or several special characteristics which expresses the natural person's physical, physiological, genetic, mental, commercial, cultural or social identity.

*Processing of personal data* is anything that happens to personal data, i.e. any measure or combination of measures in respect of personal data or sets of personal data, regardless of whether this is automated or otherwise, such as collection, recording, organisation, structuring, storage, adaption or alteration, retrieval, reading, use, disclosure by transmission, dissemination or otherwise making available, adjustment or combination, restriction, deletion or destruction.

## 2. Åland Post's processing of personal data

### 2.1. Collection and deletion of personal data

When you visit/use Åland Post's digital services or its services or communicate with Åland Post in our digital services, Åland Post will collect data about you, such as your name, address, postal address, e-mail address, phone number, identification data, information about your use of Åland Post's services and products and transaction history and, for certain services, also location information. Where appropriate, your personal identification number and data on your interest in the products or services, on the way you would like to be contacted, background information in connection with education or work, as well as data in connection with a job you are applying for, may also be processed.

Åland Post may also collect technical data on the devices you use to access Åland Post's digital services, such as IP address, unique device ID, type of browser and cookie information. The measures described in this paragraph may, for example, be carried out in connection with the filling in of forms, signing up for newsletters, communicating with Åland Post via social media platforms, leaving comments on the contact form or by telephone or using customer-specific services provided by Åland Post.

When you contact Åland Post's customer service via our digital services, for example in connection with making a complaint, your contact information and case information will be processed by Åland Post.

If you are visiting or communicating with Åland Post via our social media accounts (i.e. third-party platforms, such as Facebook, Twitter, LinkedIn, Instagram and Youtube), Åland Post may access information regarding your profile and your interactions on the third-party platform from the platform provider.

Åland Post has placed so-called "cookies" in several of its digital services. Data on how you use the digital service is collected via these cookies. More information on which cookies Åland Post has placed in its digital services and how to remove these cookies, can be found in Åland Post's Cookie Policy at <https://www.alandpost.com/cookies>.

Personal data will be processed by Åland Post only as long as it is necessary to meet the purposes of the processing or for the performance of the Åland Post's legal obligations.

## 2.2. Storage of personal data

The data collected may be stored in Finland or in another country where Åland Post conducts operations.

## 2.3. For what purpose is personal data processed?

Personal data about you, which is collected in connection with your use of the digital services and its services, will be processed by Åland Post or its sub-processors for the following purposes.

1. To ensure that Åland Post is able to provide the products and services you have ordered and to administer Åland Post's agreements with you.
2. To ensure Åland Post is able to communicate with you via customer service, email forms and on Åland Post's social media accounts.
3. To administer promotional activities, such as competitions and prizes, and for promotional purposes, including marketing by post, via e-mail and SMS.
4. To process your payment or to prevent or detect fraud.
5. To analyse and group visitors based on choice, priority and preference, which entails the performance of a so-called profiling, the aim of which is to provide you with relevant and aligned information, recommendations, advertisements and offers. It is also possible that data arising from the use of digital services other than those provided by Åland Post, are cross-referenced for this purpose and for the purpose of developing products and services. Personal data may also be processed to produce statistics on the use of Åland Post's digital services and its services.
6. To maintain and develop, test and improve Åland Post's digital services and the technical platforms on which they are provided.

#### **2.4. Legal basis and the legitimate interests for personal data processing**

Åland Post always processes your personal data in accordance with applicable legislation. Åland Post processes your personal data when this is necessary for the performance of a contract with you or to respond to your request for customer service, and when Åland Post has a legitimate and justified interest in processing your personal data, such as an interest in marketing Åland Post to visitors to its digital services or an interest in the development of its digital services. If Åland Post processes your personal data for any purpose that requires your consent in accordance with applicable legislation, Åland Post will obtain your consent in advance.

### **3. Security for the protection of personal data**

Åland Post is committed to a high level of security for your personal data and to taking appropriate technical and organisational security measures to protect your personal data from unauthorised access, alteration, dissemination or destruction.

Åland Post and its employees are subject to the obligation of professional secrecy in accordance with LL on postal services (ÅFS 2007:60). Other data on Åland Post's customers are also treated as confidential.

### **4. Restrictions on the disclosure of personal data**

Åland Post may appoint external partners and providers to perform tasks on Åland Post's behalf, such as the provision of IT services, payment solutions or assistance with marketing, analysis or statistics. The performance of these services may entail Åland Post's partners, both within the EU/EEA and outside the EU/EEA, having access to your personal data. Companies that process personal data on Åland Post's behalf, always sign agreements with Åland Post to ensure also Åland Post's partners maintain a high level of protection for your personal data. In relation to partners outside the EU/EEA, specific protection measures are taken, such as agreements that include standardised model clauses for data transfer, which have been approved by the EU Commission and which are available on the EU Commission's website.

Åland Post may disclose personal data to third parties, such as the police or other authorities, in relation to investigation of criminal offences or if Åland Post is otherwise obliged to disclose such data on the basis of law or official decisions.

Åland Post will not disclose your personal data to any other extent than that described in this item 4.

### **5. External links**

This digital privacy policy applies to data about you that Åland Post processes within the context of Åland Post's digital services. Åland Post's digital services may sometimes contain links to external websites or services which Åland Post does not control. If you follow a link to an external website, you are urged to study the policy for personal data processing and information about cookies which apply to the relevant page.

## 6. The right to information and the right to lodge a complaint

You have the right, in accordance with and pursuant to applicable personal data legislation, at any time, to request access to the personal data processed about you, to have incorrect personal data rectified, to request that Åland Post cease processing and delete your personal data, to request that the processing of your personal data be restricted, to exercise your right to data portability and to object to the processing of personal data. In such an event, please contact Åland Post at the address indicated in item 8 below.

You also have the right, at any time, to lodge complaints to the relevant regulatory authority, if you believe that your personal data is being processed in breach of the applicable personal data legislation.

## 7. Processing of personal data about children

Åland Post's digital services are not intended for children and Åland Post therefore does not knowingly collect personal data about children. If you are a parent or guardian and become aware that your child is providing personal data to Åland Post, we urge you to contact Åland Post at the addresses indicated in item 8 below, in order to exercise your rights e.g. in respect of correction or deletion.

## 8. Contact information

The Personal Data Controller for the processing of your data is Åland Post Ltd. Åland Post Ltd has appointed a Data Protection Officer. If you have any questions about how your personal data is being processed, please contact Åland Post's Data Protection Officer via email at [dataskydd@alandpost.com](mailto:dataskydd@alandpost.com) or by post to:

Åland Post Ltd  
Data Protection Officer  
PO Box 1000  
AX-22110 Mariehamn  
Åland, Finland

## 9. Amendments of this Digital Privacy Policy

Åland Post may make changes to this digital privacy policy. The latest version of the privacy policy is always available on Åland Post's website.

Last updated: 24.5.2018

<sup>1</sup>Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EG (General Data Protection Regulation).