Privacy notice for the Information Service of ported numbers www.siirretytnumerot.fi

Date created: 27 August 2020

1 Data controller

Suomen Numerot NUMPAC Oy ("Numpac"), business ID 1829232-0 Opastinsilta 12 G, 00520 Helsinki (hereinafter also "we")

2 Contact person regarding the register

Tapio Lammi email: tapio.lammi@numpac.fi

3 Name of the register

Register for the Numpac Information Service of ported numbers

4 What are the legal basis for and purpose of the processing of personal data?

The processing of personal data in the Information Service of ported numbers ("Information Service") is based on the Finnish Information Society Code (102§), 7.11.2014/917 and the data is used to provide the Information Service. According to the Information Society Code a subscriber who has entered into an agreement with a telecommunications operator may transfer their telephone number to a different operator when switching service providers. Furthermore, telecommunications operators are obligated to arrange an information service for ported telephone numbers, a task which the operators have delegated to Numpac.

The personal data is processed to maintain the Information Service based on legal obligation. Telecommunications operators disclose information to Numpac regarding fixed-line and mobile phone numbers in Finland to execute portability and for the purposes of the consumers' Information Service. The Information Service allows consumers to verify which operator owns a certain phone subscription.

5 What data do we collect and how?

In order to provide the Information Service, we process the following personal data:

- telephone number (fixed-line and mobile phone number)
- telecommunications operator's name and contact information

This personal data is obtained from telecommunications operators.

6 Who do we share the data with and is it transferred outside the EU or the EEA?

Numpac does not regularly disclose data to external parties with the exception of meeting the necessary statutory or contractual obligations of the controller.

We use an external service provider (subcontractor) for the technical implementation and maintenance of the Information Service, as well as the processing of personal data. We ensure sufficient privacy protection through data processing agreements with any subcontractors who process personal data and require that they process the personal data only to the extent required to produce the service. Personal data is processed by subcontractors on behalf of the controller and in accordance with the controller's instructions.

Personal data is not transferred outside the EU or the EEA.

7 How do we protect the data and how long do we keep it?

Access to the system containing personal data is authorised only for our employees who are entitled to process the data due to their emplyment. Each user has a unique system username and password. The data is stored in databases that are protected by firewalls, passwords, and other technical means. These databases and their backups are kept in locked premises secured with physical access control.

Personal data will be retained as long as it is necessary for the purposes, considering statutory obligations and storage times.

8 Data subject rights

You have the right to know what kind of personal data has been collected and processed by the Controller. Upon the data subject's request, we will rectify, remove or supplement any incorrect, unnecessary, incomplete or outdated personal data. The requests can be submitted in person or in writing to contact persons defined in section 2 above.

You have the right to object to or restrict processing of your data in cases defined by law, and the right to complain to the Data Protection Ombudsman.