

10.9.2024

## Elisa Etuohjelma privacy policy

### General information about the processing of personal data at Elisa

The confidentiality of personal data and communication with customers is a basic value that is important to us, as is protecting the privacy of our customers in all our operations. In processing personal data regarding our customers, employees, partners and other stakeholders, we comply with legislation, official regulations and good processing practices.

At Elisa, we follow a high level of data protection. We will only process your personal data for appropriate, predefined purposes and only when necessary. We protect our services using appropriate technical means, and we provide our personnel with regular training regarding the principles of processing personal data.

This privacy policy applies to the processing of personal data in the Elisa Etuohjelma benefit programme. This privacy policy is applied alongside [Elisa's general privacy policy](#). We are continuously developing Elisa Etuohjelma, and will amend our privacy policy to correspond to any changes, if required.

### What is Elisa Etuohjelma?

Elisa Etuohjelma is a benefit programme for Elisa's consumer customers. The programme consists of three tiers based on tier points. As a member of Elisa Etuohjelma, you have access to various benefits, including discounts, surprises, prize draws and service offers.

Elisa's consumer customers (contracting parties) can join Elisa Etuohjelma. To have access to the programme's benefits, you are required to have a monthly billed subscription or service agreement. Joining the programme is free of charge. Elisa Etuohjelma membership is personal and valid until further notice.

An up-to-date description of the content of Elisa Etuohjelma, current thresholds for the tier points required to reach each tier, and the criteria for calculating tier points are available at [elisa.fi/en/etuohjelma](https://elisa.fi/en/etuohjelma).

### What personal data do we collect and why?

#### **Why do we collect your personal data?**

We require sufficient data about you to provide Elisa Etuohjelma for you once you have joined it. We use the data collected for the following purposes:

**Providing services:** We require your data to offer and communicate the services and benefits of Elisa Etuohjelma to you and target them at you.

**Maintaining contact:** We use your contact details to notify you of any changes in services and about special offers.



10.9.2024

**Improving services:** We use your data to personalise and improve services so that we can provide you with a better user experience.

**Marketing:** We use your data to directly market Elisa Etuohjelma benefits and special offers. You can opt out of receiving marketing messages at any time.

### **What personal data do we collect?**

We process appropriate and necessary personal data. Such data includes the data you provide when joining Elisa Etuohjelma.

We collect the following data about you:

- Contact details, including first and last name, email address and telephone number
- Service language
- Customer relationship data
- Customer identifier
- Tier points and benefits
- Tier and changes in tier
- Information about whether direct marketing is permitted
- Information about orders and agreements related to products, services and subscriptions, and the start and end dates of service relationships

How do we process your data and for what purposes?

### **Grounds for the processing of your personal data**

We process your personal data to maintain and develop Elisa Etuohjelma. Furthermore, we process your personal data to provide you with the services and benefits of Elisa Etuohjelma and to target them at you. We may use your personal data to send you notifications about special offers that may interest you. In addition, we process your personal data for analytics, such as monitoring the use of Elisa Etuohjelma. This helps us understand how our customers use Elisa Etuohjelma and how we can improve it. For example, we may analyse which benefits are used the most and which need to be improved.

**Consent:** We process your contact details and your customer relationship data based on the consent you gave when you joined Elisa Etuohjelma. You can withdraw your consent at any time in OmaElisa, but if you withdraw your consent to us using your data, we cannot provide Elisa Etuohjelma for you. However, you can opt out of receiving direct marketing material at any time in OmaElisa without this having any impact on the provision of the service.

**Legitimate interest:** We process data on tiers and benefits (customer identifier, the duration of your customer relationship, consumption, programme tier, the number of tier points earned and the benefits used) based on a legitimate interest to define and provide the benefits and prizes of Elisa Etuohjelma for you and target them at you. You have the right to object to the processing of your personal data based on a legitimate interest. However, in accordance with applicable legislation, Elisa may refuse your request if there are significantly important and justified grounds for processing the data. Based on a legitimate interest, your personal data can be transferred and processed between Elisa and its subsidiaries to provide services.



10.9.2024

**Profiling**

We want to customise and develop our services, marketing and other interactions to match your needs. We may recommend benefits for you based on the Elisa Etuohjelma benefits you have used or your customer relationship with Elisa.

We may target marketing material regarding products that interest you by means of direct marketing. To generate target groups for marketing, we may process your tier and address, as well as data on the use of your benefits.

To whom do we disclose your data?

We provide part of our Elisa Etuohjelma services with our partners. If you participate in a prize draw organised by us with one of our service provider partners and you win a prize, we will disclose your contact details to that service provider so that we can deliver the prize to you.

We use subcontractors in providing the Elisa Etuohjelma programme. In using subcontractors, we ensure that, whenever they process personal data, they comply with our data protection principles and process the data carefully and confidentially. We ensure this by entering into contracts and auditing subcontractors' operations.

We use cookies on our website in accordance with Elisa's general cookie policy. More information about the cookie policy is available in [Elisa's data protection principles](#).

We use a US-based platform service provider in our service production. The data centres we use are located in the EU, but it is possible that data can be accessed from the United States during maintenance or malfunctions. The party that processes the data is committed to complying with Elisa's data protection principles and processing data carefully and appropriately, and Elisa has ensured the grounds for processing as required by applicable data protection legislation using, for example, the standard contractual clauses approved by the European Commission or based on the European Commission's adequacy decision.

For how long do we retain your personal data?

We will only retain your personal data as necessary, and the retention period varies depending on the type of data. Once the data retention period has ended, we will dispose of personal data by erasing it or modifying it so that data subjects can no longer be identified (i.e. by anonymising the data). We will process part of your personal data during the entire duration of your Elisa Etuohjelma membership. We will retain your personal data throughout your Elisa Etuohjelma membership, and for no longer than two years after the end of your membership, in all situations.

Your rights

You have the right to affect the processing of your personal data. You have the right to identify what data about you we process in Elisa Etuohjelma. You can access your data in OmaElisa, by visiting an Elisa shop or by contacting Elisa's customer service.



10.9.2024

If you discover that we are processing any incorrect or outdated personal data, you can request that it is rectified by notifying us in OmaElisa or by contacting our customer service. When your customer data is up to date, we can provide the best possible services for you.

You can withdraw your consent to the processing of your personal data, including consent to marketing, at any time in OmaElisa. You can withdraw your consent in OmaElisa settings, where you can edit your marketing permissions and other consent.

You have the right to request that any data is erased if it no longer needs to be processed. We will do our best to erase such data automatically, but if you discover that we are processing any outdated or unnecessary data for any reason, you can contact us by completing the contact form in OmaElisa.

You have the right to obtain the data you have provided if the processing of the data is based on your consent. You can request your data using the contact form in OmaElisa.

In addition, you can request that we restrict the processing of your personal data in certain situations or object to the processing of your personal data. To do this, contact our customer service or use the contact form in OmaElisa.

You have the right to file a complaint with the data protection authorities if you consider the processing of your personal data to be in breach of applicable data protection legislation.

#### Our contact details

[OmaElisa](#) (point of contact for the processing of personal data)  
[Elisa customer service](#), tel. +358 10 190 240  
[Our other contact details](#)

#### Data protection officer

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PO Box 1  
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