



## **SHIFT PRIVACY STATEMENT**

*Last update 5.12.2023*

### **Who is collecting your data?**

SHIFT Events Oy  
Tykistökatu 6  
FI-20520 Turku, Finland

Contact information for matters concerning processing of customer data:  
info@theshift.fi

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

Generally we collect your personal data from you directly (for example, when we deal with you in person or over the phone, when you send us correspondence (including via email), when you complete a questionnaire, form or survey, when you subscribe to our publications or when you use our websites or our social media sites). We may also collect personal data about you from your use of our websites and information you provide to us through contact mailboxes or through the registration process to our events.

If you do not provide us with the personal data we have requested, we may not be able to complete or fulfil the service requested. Such collection of personal data is based on your given consent to or on other legal basis for the processing of personal data under the applicable data protection legislation.

At times processing of your personal data may be necessary for compliance with a legal obligation to which we are subject.

### **The type of personal data we collect**

You do not need to register your personal data in order to use our websites. In general we collect only such personal data as is provided voluntarily by visitors to our websites and is necessary in the circumstances. For example, you may provide information such as your name, title, work address and email address in order to register for certain services or to send or receive email to/from us through the site.

Should you be our customer, employee or participating in a recruitment process, for instance, we collect your personal data according to the applicable data protection legislation.



Some data is necessary for us to enable you to move around our websites and use its features (this includes performance and functionality cookies, which are necessary to provide services requested by you).

The types of personal data we collect include:

- names, job titles, contact and address details
- online identifiers (IP addresses, cookies etc.)
- educational qualifications, employment details
- interests and behaviours on our websites

If you wish to receive our marketing materials, we may request various contact details depending on the type of marketing materials you would like to receive. This may include name, email address, physical address, and telephone number.

If you are interested in our services, we will request contact details including your name, company, and email address in order that we can discuss your requirements with you.

Where you are invited to attend our events, we will record your response to the invitation.

We do not request sensitive personal data through our website, however, we will request voluntary information about your dietary requirements in order to cater for your needs when attending our events. By giving us this information you give your consent for SHIFT Events Oy to process that information.

### **Purpose of the collecting and processing of personal data**

We will use your personal data only for the purposes stated in this Privacy Statement, unless we obtain your specific consent to other uses.

SHIFT Events Oy collects, holds and uses personal data for a number of purposes including:

- to provide our services
- to respond to your requests or queries
- to maintain contact with our clients and other contacts (including alumni), and keep them informed of our services and events
- to allow you to register to our events and services
- for recruitment purposes
- to conduct surveys
- for seeking your feedback



- to meet any regulatory obligations to perform internal statistical analysis, including of our databases and websites
- to profile website users based on consent to target customers with personalised marketing messages based on their usage of our websites for any other business-related purposes

### **Sharing and transfer of personal data**

We do not disclose your personal data to third parties except as required and permitted by applicable law.

We do not sell your personal data or provide it to third parties for their direct marketing use. In case of joint events, service of project, we will specifically point out the third parties involved.

### **Data security and storage**

We have appropriate technical and organisational security policies and procedures in place to protect personal data and information from loss, misuse, alteration, or destruction. We hold personal data in electronic formats.

We aim to ensure that access to your personal data is limited to those who need to access it. Those individuals who have access to the data are required to maintain the confidentiality of such information.

We do our best and continuously implement and update our measures to protect your Personal Data against unauthorized access, destruction or alteration. We act in accordance with authorities and our cooperation partners to guarantee you data protection under the applicable laws. Nevertheless you shall remember that in case of the internet, not any information is entirely sure and secure. You may review, update, correct or delete your Personal Data by sending us email to [info@theshift.fi](mailto:info@theshift.fi).

We use all reasonable efforts to retain personal data collected from you only for so long as we need such data in accordance with the purpose for which it was collected or until we are requested to delete it (if earlier). We apply reasonable efforts to assure that inaccurate, incorrect and outdated personal data is deleted or corrected without undue delay.

You are also entitled to be forgotten completely by us, if so requested, but please remember that in such case the lost information may not be brought back. Please notice that removal of Personal Data does not have effect on Collective Data. Please



note that we cannot and do not have control over other websites than the Site, even though a link to such site may be contained to our Site. These other websites may place their own cookies, web beacons or other files on your device, or collect and solicit Personal Data from you under their own rules about the collection, use and disclosure of Personal Data. You should read all related terms and conditions and policies before entering such site. Do not enter or use a website which you do not trust or agree with on matters related to your privacy.

### **Links to other sites**

Our web sites may contain links to other sites. Please review the privacy policy of each web site you visit before submitting any personal data to it. Whilst we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content, security, or privacy practices employed by other sites.

### **Your rights**

Regarding the processing of your personal data, you have the following rights:

- withdraw your consent at any time, where your personal data is being processed based on your consent obtain confirmation whether or not personal data concerning you is being processed obtain a copy concerning your personal data
- obtain without undue delay the rectification of inaccurate personal data concerning you have incomplete personal data completed
- obtain the erasure of personal data concerning you without undue delay
- object at any time to processing of your personal data for profiling or direct marketing purposes
- the right to file a complaint with a supervisory authority regarding the processing of your personal data

If you wish to exercise your rights, please contact us at [info@theshift.fi](mailto:info@theshift.fi)

If you wish to unsubscribe from any SHIFT Events Oy mailing list, please use the unsubscribe link provided in each email from us.



## DATA PROTECTION DESCRIPTION REGARDING THE WEBSITE SPECIFICALLY

### General

These terms and conditions for privacy (hereinafter "Privacy Policy") is applied to the site [www.theshift.fi](http://www.theshift.fi), including relevant sub-sites, (hereinafter the "Site"). The Site is provided by and property of Shift Events Oy (hereinafter "SHIFT", "we", "us", or "our") and its licensors.

By using the Site you understand and agree that this Privacy Policy govern your access to and use of the Site. Please notice that by using the Site you agree to comply with and be legally bound by our Privacy Policy, regardless whether you sign into our mailing list, become a registered volunteer or buy a ticket to the festival.

If you do not agree to any part of this Privacy Policy, you should stop accessing the Site. Please note that this Privacy Policy may be amended from time to time.

### Definitions

For this Privacy Policy, the following definitions shall be applied:

- a) "Collective Information" means information about all of our users or specific groups or categories of users that we combine together thus that a data subject may no longer be identified;
- b) "Data Controller" means SHIFT, which is the organisation responsible for the processing of Personal Data;
- c) "Data Subject" means an identifiable natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- d) "Third parties" means companies or persons not related to SHIFT by common ownership or control and all other unrelated individuals;
- e) "Personal Data" means information relating to a Data Subject; and
- f) "Processing" means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.



## **How we gather Personal Data**

Firstly, we gather personal data that you make available to us when accessing or using our Site, for example information that occurs when you fill forms (eg. registration for a volunteer, an event or buying a ticket) on Site, book or pay for any associated services that may be available, post comments or reviews, or communicate with other users or with us. Secondly we receive Personal Data from your use of the Site, such as mobile data, log data, cookies and other data related to tracking technologies and Third party social plugins. Using such tracking technologies such as cookies will help us to provide our service. By using the service of our Site, you'll accept the use of cookies and other tracking technologies in your browser.

## **How we use Personal Data**

We process your Personal Data for following purposes:

- (a) to operate, protect, improve and optimize our users' experience (i.e. the Site) and our business operations, for which we may inter alia perform analytics, conduct research, personalize or otherwise customize your experience;
- (b) to help create and maintain a data secure and data protected environment on the Site, including performing risk assessments and actions for preventing and reject actual and potential misconduct, malpractice, assaults and other unwanted activities which may cause any damage to you or us;
- (c) to provide customer service and to send you messages, reminders, technical notices, updates, security alerts related to the Site, and information requested by you;
- (d) to send you marketing, advertising, and promotional messages and other information that we see to interest you, including information about us, our services, or general promotions for partner campaigns and services. You can unsubscribe or opt-out from receiving these communications by using the unsubscribe link or by sending us email to [communications@theshift.fi](mailto:communications@theshift.fi). Please note that by registration to the mailing list, as a volunteer or as an event member (buying, or otherwise giving your consent to receive a ticket or register for an event) you give explicit consent for SHIFT to process your Personal Data for electronic direct marketing under the Section 200 of the Finnish Information Society Code (917/2014, as amended);
- (e) to administer referral programs, rewards, surveys, sweepstakes, contests, or other promotional activities or events sponsored or managed by SHIFT or our third party business partners; and



(f) to comply with our legal obligations, resolve any disputes that we may have with any of our Site users, and enforce our agreements with third parties.