



## PERSONAL DATA PROCESSING NOTICE

### How we process your personal data

In this privacy notice, we describe the privacy practices of Hotel Arthur Oy.

Your privacy is important to us and we explain how we collect, process and, where necessary, disclose your personal data in our customer and partner relationships and in connection with our website (hotelarthur.fi).

In accordance with the EU General Data Protection Regulation, we want to inform our website users, our current and potential customers and our current and potential partners about our processing of personal data in a concise, transparent, easily understandable format in clear and simple language.

In addition to the information below, if you have any questions about our privacy policy, please feel free to contact us.

### Controller

Hotel Arthur (business ID: 0426918-9)

Vuorikatu 19 00100 HELSINKI tel. 09 173 441

reception@hotelarthur.fi

### Contact

Tanja Tähtinen

tanja.tahtinen@hotelarthur.fi

### Registers

We may process your personal data for different purposes and therefore in different registers. For example, the customer and employee registers of Hotel Arthur Ltd.

### Processors of personal data

HOTEL  
**ARTHUR**  
EST. 1907

Accounting, invoicing and payroll

**Accountor Holding Oy**

(business ID: 2480336-9)

Keilaniementie 1, 02150 ESPOO

puh. 020 744 2000, [privacy@accountor.com](mailto:privacy@accountor.com)

Microsoft 365 environment

**Microsoft Corporation**

One Microsoft Way,

Redmond, WA 98052-7329,

USA

Booking systems

**Amadeus Hospitality**

**Americas, Inc.**

**(TravelClick & IHotellier)**

75 New Hampshire Avenue

Portsmouth, NH 03801, **USA**

[hospitality.privacy@amadeus.com](mailto:hospitality.privacy@amadeus.com)

Video surveillance

**Avarn Security Oy**

(business ID: 0108013-7) Pitäjänmäentie

14, 00380 HELSINKI tel. 0204 2828,

[tietosuoja@avarnsecurity.fi](mailto:tietosuoja@avarnsecurity.fi)

IT services

**Network Services Finland Oy**

(business ID: 1784215-9) Mittalinja

1, 01260 VANTAA

puh. 0201 424 200, [info@nsf.fi](mailto:info@nsf.fi)

**ATVA**

(business ID: 2493113-3) Myssyntie 141,

01830 LEPSÄMÄ

puh. 050 362 6293, [palvelu@atva.fi](mailto:palvelu@atva.fi)

iLog key system

**BLC-Turva Oy**

(business ID: 1567723-3) Voimatie 12,

80100 JOENSUU

tel. 029 70311500, [turva@bhc.fi](mailto:turva@bhc.fi)

## What personal data we collect and process

As a general rule, we collect and process personal data that:

- you have given us when you communicate or deal with us;
- we have obtained from public sources to the extent permitted by law for our purposes; and personal data which.
- are generated when you visit our website.

You are under no obligation to provide us with your personal information, but if you choose to do so, we may not be able to provide our services to you.

For example, we process the following personal data:

- basic information, such as name, contact details, language of service and billing information;
- the information necessary to fulfil their cooperation and legal obligations;
- customer feedback data;
- booking information such as first name, last name, email address, phone number, address, city, country, postcode and credit card details;
- reserve data on provisions made in the past;
- information relating to the customer's wishes; and
- information collected in connection with your use of our website (such as log information and cookies).

In addition, for the purpose of the passenger declaration, we may collect the following information:

- your full name and Finnish personal identity number or, failing that, your date of birth and nationality;
- the full names and Finnish personal identification numbers of the accompanying spouse and minor children, or, in their absence, their dates of birth;
- Address;
- the country from which it arrives in Finland;
- the number of the travel document; and
- the date of arrival at the accommodation and the date of departure, if known.

We may also process your other data on a case-by-case basis.

## Purpose and legal basis for processing personal data

We only collect and process personal data that is necessary for the performance of our activities and to serve you or your organisation.

The purposes (and legal grounds) for our processing are:

- customer relationship, employment relationship and cooperation: we process personal data primarily for this purpose and the processing is based on the contract between us and/or the legislation governing the accommodation;
- recruitment and marketing: our processing of personal data here is based on our desire to provide you with information about us and our services and to assess our potential for cooperation (legitimate interest); for direct marketing, you have the right to object to the processing of your personal data at any time;
- developing and reporting on our services: we may process personal data to ensure the quality of our services (including our website; legitimate interest);

- Legal compliance: we process your personal data to comply with our legal obligations, for example, to process a passenger declaration; and
- other purposes: we may also process your personal data for other purposes if you have given your consent to such processing.

We do not use your personal data to make automated individual decisions (including profiling).

For those under 18 years of age, we do not knowingly allow you to book a room at our hotel and we do not collect or request personal data without the consent of your guardians. If we become aware that we have collected information from such persons without their consent, we will take immediate steps to obtain their consent.

## Your responsibilities

You will only provide information about yourself or, if you provide information about another person, you are responsible for ensuring that you comply with all legal obligations that govern your right to provide us with personal information and that allow us to use, process and transfer that information. If you provide credit card information to another person, you confirm that the credit card holder has consented to the use of the credit card in connection with the purchase and that we may use their information in accordance with this processing notice.

We also assume that the information you provide is accurate and if it needs to be updated, it is your responsibility to inform us.

## Retention period of personal data

Personal data is only stored for as long as it is necessary for the purposes of the customer or employer relationship or for as long as required by law for each purpose. In other words, we process personal data in accordance with the purpose and for the duration of each use. Please note that longer processing may be required by law (e.g. accounting obligations). The data will be deleted once the retention period specified above has expired. In particular, we would like to remind you that, for example, legal obligations binding us may require us to retain the data even after the end of the customer or employee relationship, for example.

Arthur's customer register will automatically delete the data after 730 days and the travel cards will be stored for one year, after which they will be destroyed.

## Regular sources of information

The data sources are the information provided by the customer or the employee himself/herself orally, in writing, by telephone, by e-mail or via the Hotel Arthur Oy website or other online service, customer information systems and the invoice database.

## Regular data disclosures

Personal data is not regularly disclosed to third parties. Register data may be disclosed, as necessary, to the processors of the register specified above.

We may disclose personal data to other parties:

- where our partners (including IT support) process personal data on our behalf and in accordance with our instructions (we will hold all such partners to similar practices to ours); and
- when we consider that disclosure is necessary, for example, to exercise our rights, to ensure our security or to respond to requests from public authorities.

We may also disclose your information to other parties with your consent.

We do not transfer your data outside the EU or the European Economic Area.

## Principles for the protection of the register

The data is stored in a technically secure manner. Physical access to the data is prevented by storing the data in locked premises. Access to the data requires adequate rights, such as a personally provided key or a specially assigned user account to the system. Only the controller and specifically designated technical staff have access to the register data. Only the designated persons have the right to process and maintain the data in the register. Users are bound by confidentiality. Personal data are backed up securely and can be restored if necessary. Security is ensured by keeping the systems used up to date and up to date, and by using secure encryption techniques to transmit data over the network.

We continuously assess the risks associated with our activities and, in light of these, we take appropriate technical and organisational measures to protect your personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access. Our partners are also committed to a high level of data security. We continuously strive to improve our internal processes, including training of our staff.

However, despite appropriate and up-to-date security measures, we cannot guarantee that some data, either during transmission or once stored in our systems, will be completely safe from intrusion by others. However, we believe that we will continue to use, for example, e-mail to communicate with you, unless you object.

## Cookies and external services

We use cookies and other similar technologies on our websites that collect information. Such information includes IP addresses, browser version, number of visits and similar information about internet usage and site visits. A "cookie" is a small text file that is stored on your computer's hard drive. Cookies allow us to improve our website and provide services that are better tailored to your needs. You can prevent cookies from being stored by activating these settings in your internet browser. However, please note that not accepting cookies may prevent you from accessing certain features of our site or otherwise degrade your experience. Google Analytics provides a visitor tracking service for our website. The data collected by cookies is not shared by us with any other parties.

We may use third party applications and content tools on certain parts of our website. An example of such a third party application is Google Maps. When you use such applications or content tools, these third parties may receive your personal information, for example, when you are logged in to those services.

## Data subject rights and other important information

Once registered, you have:

- right of access to personal data: you can contact us to check what data we have stored about you;
- right to rectification: although we aim to provide complete and up-to-date information, you can contact us to request that inaccurate information be corrected;
- right to erasure: if the purpose of the data has ended, we will erase your data and you have the right to request us to do so;
- right to restriction of processing: you can contact us and, within the limits of the law, you can restrict the processing of your personal data;
- the right to object: we have put in place mechanisms for data subjects to object to the processing of their personal data within the limits of the law, for example to freely withdraw their prior consent; and
- right to data portability: you can contact us if you need your data on systems other than ours and we will endeavour to provide the data in such a way that it can be transferred to another system.

For all of the above, please note that your rights may be limited in relation to personal data that:

- are necessary for the purposes specified in this opinion; or
- which the law requires you to keep;

We ask that all requests for information be sent to the contact person by email and we will respond within the time limits set by law.



While we strive to comply with all aspects of data protection law, if necessary you can contact our contact person or lodge a complaint with the relevant supervisory authority (see <http://tietosuoja.fi> for more information).

## Updates to the processing notification

We will review this statement regularly and post any updates on this page. The contents of this statement were last updated on 21 November 2024.