

Privacy Notice

Name of Processing Activity

Digital deposit system processes in application or dynamic net site

Identity and Contact Details

Kamu Collective Oy
2937328-1
Lapinlahdenkatu 16
00180 Helsinki
hello@kamupak.com

If you wish to contact us regarding issues related to this privacy notice (including the exercise of your rights), please e-mail us at the above address or fill in the contact form available at www.kamupak.com

We aim to respond to you in a timely manner and will do so in any event within any applicable legal time limits.

The Purposes of Processing

The gathered information is used to enable the deposit service provider's backend system to identify the partners and locations where the deposit transaction takes place.

The system utilizes personalized identifiers that can be eg. persons or entity's e-mail address and GPS location data, which enables for the successful processing of the transactions.

Legal Basis for Processing [and the Legitimate Interest pursued]

The personal data is gathered when a person registers his/her Kamupak-application with a functioning e-mail address and thus allows the registering data to be used for the running of the deposit scheme. The e-mail functions as identifier and it is necessary for the running of the scheme as well as for validating the transactions that are the basis for Kamu Collective Oy's businesses.

A Person is also requested to allow the use of GPS data when using the application to enable for the claim of the deposit successfully when returning a product.

The data can be used to improve the customer service and the product.

Categories of Personal Data Processed

E-mail address
GPS location
Purchase and returns history

Recipients or Categories of Recipients of the Personal Data

No personal data is shared outside of the organization. Data can be shared in anonymized format without links to users for analytics purposes.

International Transfers

The personal data is not Transferred outside the EU/EEA

Data Retention Period

The data can be stored in the system logs for as long as it is necessary for balance of payments, inventory management or life cycle tracking of the products.

Right of Access, Rectification and Erasure/Restriction, Objection and Data Portability

Under the General Data Protection Regulation (2016/679, "GDPR"), you have the:

Right to know if your personal data is processed, and if it is, have access to your personal data, as well as be provided with the information included in this privacy notice, and to receive a copy of your personal data, provided that this does not adversely affect the rights and freedoms of others. Only the first copy is free of charge (Ref. GDPR Article 15);

Right to have your inaccurate personal data rectified and incomplete personal data completed (Ref. GDPR Article 16)

Right to have your personal data erased without undue delay, if (a) the data is no longer necessary for the stated purposes; (b) you withdraw your consent, where processing was justified only by consent; (c) you object to the processing pursuant to Article 21(1) of the GDPR and there is no overriding legitimate interest, or Article 21(2) of the GDPR; (d) your personal data has been unlawfully processed; (e) erasure is necessary for compliance with applicable laws; or (f) your personal data was collected in relation to the offer of information society services (Ref. GDPR Article 17).

Right to obtain restriction of processing of your personal data, if (a) you contest the accuracy of your personal data (for a period enabling us to verify the accuracy of the personal data); (b) the processing is unlawful and you request restriction instead of erasure; (c) we no longer need your personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims; (d) you have objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether our legitimate grounds override yours (Ref. GDPR Article 18).

Right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller, if (a) the processing is based on consent or on a contract; and (b) the processing is carried out by automated means (Ref. GDPR Article 20).

IMPORTANT: Only the main content of these rights has been summarized here. Please refer to the GDPR and/or local laws for full content. Restrictions

	<p>to these rights as allowed by the GDPR and/or local applicable laws may apply.</p> <p>To act on your request, we need to have sufficient certainty of your identity. We therefore kindly advise you to be prepared to provide requested reasonable information to enable us to identify you.</p> <p>Please note that where requests are manifestly unfounded or excessive (as shown by us), we may either charge reasonable administrative fees for handling a request or refuse to act on it.</p>
<p>Right to Withdraw Consent</p>	<p>Where processing of your personal data is based on consent, you have a right to withdraw that consent anytime by notifying us of your withdrawal as instructed in the contact details section above. Please note that withdrawal does not affect the lawfulness of processing prior to withdrawal.</p>
<p>Right to Lodge a Complaint</p>	<p>You are entitled to lodge a complaint with the competent supervisory authority if you doubt that we are not processing your personal data legally or otherwise fail to fulfil our legal obligations related to processing your personal data, or if you have other reasons to do so. [See the applicable supervisory authorities at: https://tietosuoja.fi/yhteystiedot]</p>
<p>Necessity of Processing and Consequences of failure to provide personal data</p>	<p>The personal data requested as part of the registering process to the Kamupak-application is a necessary requirement to use the application. If the data is not provided, the use of the application can not be permitted.</p> <p>Similarly the access to GPS location is used as part of the validation process to localize where the products are being returned. If the GPS location is not permitted the return process fails.</p> <p>There might be other means which permits the use of deposits without e-mail address that fall beyond this clause.</p>
<p>Automated Decision-Making</p>	<p>The use of Kamupak-app does include automated decision making by addressing the product returns to identified locations and users and by adding the deposits for the user's account automatically. Similarly the use of deposits are automated so that when consumer uses the deposit through Kamupak- application, the deposit is automatically charged from the user's account leaving a mark in the log file.</p>
<p>Source of Personal Data</p>	<p>The personal data is provided by the user when registering as Kamupak-application user, and as a consequence of using the Kamupak system to return and purchase deposit products.</p>