# REGISTER OF LEGISLATIVE DUTIES BASED ON ELECTRICITY MARKET LEGISLATION - PRIVACY STATEMENT

(General Data Protection Regulation (EU) 2016/679, articles 12-14)

This privacy statement explains how Fingrid Group processes personal data when carrying out the functions required by public service obligations specified for Fingrid by law, which are not part of actual grid operations or system responsibility. The statutory service functions covered by this statement are peak load capacity service, services in connection with the guarantee of origin of electricity and services aimed at developing communication in the electricity market.

Fingrid Group comprises Fingrid Oyj and its subsidiaries Finextra Oy and Fingrid Datahub Oy. Fingrid Oyj deals with questions concerning personal data centrally within the Group, and the execution of the rights of data subjects presented below in this statement.

#### 1. Contact information for the Registrar

Fingrid Oyj, Data Protection Officer Läkkisepäntie 21 00620 Helsinki PO Box 530, 00101 Helsinki

Fingrid Oyj - telephone switchboard +358 (0)30 395 5000

#### 2. Person in charge of register matters

Data Protection Officer Niko Tuononen E-mail: dpo@fingrid.fi

# 3. The purpose of and grounds for personal data processing

Personal data is processed in order to meet Fingrid's statutory obligations concerning the exchange of information on the electricity market, guarantees of origin and peak load capacity. These statutory obligations originate from the following acts: the Electricity Market Act (599/2013), the Act on Guarantees of Origin for Energy (1050/2021) and the Act on the Power Reserve Ensuring Balanced Production and Consumption of Electricity (117/2011) and decrees issued based on them.

In addition to statutory obligations, the processing of personal data may also be based on the legitimate interest of a company belonging to the Fingrid Group (e.g. information concerning the contact persons of customers).

#### 4. Personal data to be processed

- data required in operations, such as name, language, title, telephone number, invoicing address and e-mail address
- user account information such as user ID and password
- user rights to Fingrid's e-Services / ICT systems and user data of ICT-systems
- accounting point IDs (electricity accounting points)
- memberships of working groups
- copies of passports (administrators of the guarantee of origin register)

#### 5. Regular data sources

Data is received from the data subject him/herself or an organisation represented by him/her. ICT systems collect user data.

Accounting point IDs are obtained from DSOs.

#### 6. Regular assignments of data

Data is assigned in accordance with legal requirements to other electricity market actors or authorities.

## 7. The transfer of data outside the EU or EEA

Data in a register may be transferred outside the area of member states of the European Union or the European Economic Area, if this is necessary in terms of the purposes of processing the above-mentioned personal data or of the technical execution of the data processing. In that case, the transfer of the data complies with the requirements stipulated in the EU Data Protection Regulation.

## 8. Data protection

Data is protected by appropriate technical and organizational measures. The paper material is stored in a locked state. Electronic material is protected by technical measures and access to the systems is granted only to those persons for whom it is necessary for their work or function. Fingrid's personnel are bound by professional secrecy. Staff are trained and instructed in the lawful processing of personal data.

External data processors are also required to have adequate technical and organizational protection measures as well as a commitment to confidentiality.

#### 9. Time for storing data

Data is checked for as long as is necessary in terms of the provision of services.

## 10. Rights of the data subject

A data subject is entitled to ask the registrar for access to personal data concerning him/herself, and has the right to request the correction of his/her personal data or the limiting of its processing.

The data subject has the right to have his/her data removed, insofar as the processing of the data is based on the consent of the data subject, or if the personal data is not required for the purposes described in Section 3. There is no right to the removal of data if Fingrid has a statutory obligation to keep the data, or if Fingrid needs the data to prepare, present or defend a legal claim.

A data subject may use his/her rights by contacting:

Fingrid Oyj / Niko Tuononen PO Box 530, 00101 Helsinki

E-mail: dpo@fingrid.fi

## 11. Automatic decision-making and profiling

The Registrar does not make decisions based on automatic processing.

## 12. Making a complaint to the supervisory data protection authority

If a data subject considers that the processing of his/her personal data breaches applicable legislation, or his/her statutory rights have been infringed, he/she may make a complaint about the matter to the Data Protection Ombudsman whose contact information can be found at the following address: <a href="http://www.tietosuoja.fi/en/">http://www.tietosuoja.fi/en/</a>.