

*Apetit*

# Apetit

Privacy notice  
relating to handling  
personal data of  
consumer  
customers

2023



<b>Data controller and contact details</b>	<i>Name</i> Apetit Oyj (0197395-5)
	<i>Address</i> Sörnäistenkatu 1 A, 00580 Helsinki
	<i>Contact person</i> Data Protection Officer
	<i>Contact details</i> tietosuoja@apetit.fi
	<i>Email address</i> tietosuoja@apetit.fi
<b>Register</b>	Register of personal data about consumer clients of Apetit
<b>Purpose and principles of handling personal data</b>	<p>The purpose of handling personal data is:</p> <ul style="list-style-type: none"><li>• providing services</li><li>• maintaining consumer relations</li><li>• marketing</li><li>• providing and managing customer feedback</li></ul> <p>The principle for handling data is the permission granted by the data subject as required in the Article 6.1 of the GDPR.</p>
<b>Content of the register</b>	<p>This privacy policy covers the personal data collected through web pages and services maintained by Apetit.</p> <p>Depending on the system, register might contain the following types of data:</p> <ul style="list-style-type: none"><li>• first and last name</li><li>• email address</li><li>• postal address</li><li>• phone number</li><li>• date of birth</li><li>• username and password</li><li>• gender</li><li>• feedback (feedback system)</li><li>• content related to food preferences (njam.fi)</li><li>• contest related data</li></ul>
<b>Automatic profiling</b>	Personal data used in Njam-application is partly profiled automatically when recipes are recommended for users based on their previous choices (diet, allergies). Automatic profiling is required in order to use the application and when using the application, users acknowledge and approve automatic profiling of their data. Data subjects can at any point stop the automatic profiling by asking the removal of their personal data as described in the last paragraph of this document. Personal data is removed automatically 12 months after not using the application.
<b>Data sources</b>	Data provided by the data subject
<b>Disclosure of the data to third parties</b>	Personal data from this register is disclosed to third parties as part of providing IT and marketing services. When disclosing data, Apetit always



	<p>ensures the third party suitability to be a data processor through security reviews and data processing agreements.</p> <p>Data may also be disclosed to various governmental agencies as required by the local laws and regulations.</p>
<b>Disclosing personal data outside EU</b>	<p>Personal data in this register is mainly handled within EU, however as part of certain services, personal data might be processed outside EU. When data is transferred outside EU, they are only transferred to countries where the personal data in question is protected according to the privacy legislation by using the EU commission model clauses or by ensuring the data processor operates as per requirements set in the Privacy Shield system.</p>
<b>Data protection principles</b>	<p>Data in the register is protected through various governance and technical controls. Data is always handled confidentially and access is restricted to only personnel who are authorized to handle personal data in question. Personal data is handled only when required and according to the principles required in this document.</p>
<b>Retention of the data</b>	<p>Personal data stored in the Njam-application is removed automatically 12 months after the customer stops using the application.</p> <p>Data in the customer feedback system is removed manually six months after the feedback is resolved.</p> <p>When participating in various contest, personal data is primary processed only within that contest and removed after the contest is finished unless data is used for marketing purposes after the contest. In this case it is clearly specified and consent requested from the participant. The data is then moved to the marketing register and stored accordingly.</p> <p>When personal data is stored for marketing purposes, it is maintained in the marketing databases for as long as the data subject maintains customer relations with Apetit. Data subject can at any point request the removal of data as stated in the following paragraph.</p>
<b>Rights of the data subject</b>	<p>Data subject have the following rights to their own data as per GDPR:</p> <ul style="list-style-type: none"><li>• Right to see the data about the data subject</li><li>• Right to rectification</li><li>• Right to erasure or to be forgotten</li><li>• Right to restriction of processing</li><li>• Right to data portability</li><li>• Right to object</li></ul> <p>Data subjects have the right to object the usage of their data for marketing purposes. Data subject can fulfill their right by following the instructions in the marketing messages or by contacting Apetit privacy team as per instructions in the first paragraph.</p>