

1.7.2019

Posti register for recorded phone calls

Processing of personal data in Posti register for recorded phone calls is the responsibility of Posti Group Corporation

Posti Group Corporation (business ID: 1531864-4)

Posti Customer Service PO Box 6, FI-00011 POSTI

Street address: Postintaival 7 A, Helsinki

Tel. +358 (0)600 94320 (EUR 1.84/answered call + local network charge/mobile call charge)

www.posti.fi consumerservice@posti.com

Data Protection Officer: tietosuoja@posti.com

Purpose and legal basis of personal data processing

Posti records telephone calls related to business or service transactions to verify the call content, if necessary. The recordings are used to ensure the rights and legal protection of the customer and Posti. The recordings can also be used in in-house personnel training to improve customer service quality and to develop services. Recordings may also be processed for Posti's security and for the purpose of preventing abuse. The recordings will not be used for any other purposes or disclosed to parties outside Posti unless required by law.

The processing of data is based on the legitimate interests of Posti.

Data processed in the register for recorded phone calls and its retention

The register for recorded customer calls includes the following data stored on incoming calls to the customer service or telesales unit, and on outgoing calls to customers made by the customer service or telesales unit:

- Start and end time of the call
- Duration of the call
- Telephone number of Posti customer service unit
- Customer's telephone number (last three digits hidden)
- Name of Posti employee who answered or made the call
- The telephone conversation in a voice recording

The recordings are retained for six months, after which they are automatically erased.



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Regular sources of data

Data in the register originates from customer calls to the Posti Group's customer service numbers and from calls made by the customer service and telesales units to customers. Recording starts when the call is answered and ends when the call is terminated.

Disclosure of data

Data in the register will not be disclosed for direct marketing purposes or to third parties.

Due to the technical implementation of the processing of data, some data may be physically situated on external subcontractors' servers or hardware, where they are processed through a technical interface.

Personal data is not transferred outside the European Union or the European Economic Area.

Data protection principles

Data in the register for recorded customer calls can only be accessed by designated persons who maintain the customer call management system, as well as customer call operators and telemarketers together with their supervisors. Posti's customer service operators and telemarketers can listen to their own recorded calls, and supervisors can listen to the recorded calls of all their subordinates. The recordings show the customer's telephone number with the last three digits hidden.

System administrators and customer service operators, as well as their supervisors, must attend

training pertaining to the use of the system.

The training covers Posti Group's instructions on handling business secrets and customer data.

All data is processed confidentially and may only be disclosed to persons who need them to perform their duties and who are bound by a non-disclosure obligation.

Rights of data subjects, access to information, rectification and completion of data, restrictions

The data subject has the right to know about the processing of his or her personal data, to review his or her personal data and to request rectification of inaccurate data and completion of incomplete data. The data subject may request the erasure or transfer of personal data or request restriction of processing. When processing is based on consent, consent can be withdrawn at any time.

If a customer wishes to access a recording of his or her telephone call in the register for recorded calls, he or she can submit an online request for a review of personal data at www.posti.fi/yhteystietoni. The customer can listen to the recording at a Posti outlet.



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Data subjects may also submit requests for review, rectification and completion by personally visiting Posti Ltd's address mentioned above or by sending a signed request to the said address or by sending a scanned copy of a request by e-mail to consumerservice@posti.com.

Requests will be handled on a case-by-case basis, as these rights may be subject to restrictions due to the circumstances.

All data subjects have the right to lodge a complaint with a supervisory authority, especially in the Member State where they have their habitual residence or place of work or where the alleged breach of the data protection regulation occurred (in Finland, the supervisory authority is the Data Protection Ombudsman).