

Privacy protection policy of the Kaikukortti register

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1. Registrar

Association Yhdenvertaisen kulttuurin puolesta ry / Kulttuuria kaikille -palvelu (Culture for All Service)

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2. Person responsible for register matters

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3. Name and description of register

Kaikukortti-rekisteri (Kaikukortti Register).

Kaikukortti is a card with which cardholders can obtain free entrance tickets and course places among all the cultural services that are part of the national Kaikukortti network. The card is intended for people who are clients of the social welfare and healthcare units within the network and, due to financial constraints, can't afford to use cultural services. Demographic data on the cardholders given by the participating actors in the social welfare, healthcare and wellbeing sector are aggregated in the register, as well as data provided by the participating cultural operators on which card type has been used in which of their events.

4. Purpose of handling personal data

The information in the Kaikukortti register is used for compiling statistics on the Kaikukortti cardholders and the usage of the card, as well as for decision making regarding promotion of the use of the card and for reporting on and developing Kaikukortti activities. Information that would directly identify a person, such as name, social security number, date of birth or address, is not at any stage stored in the register.

5. Information content of the register and usage of data

The following is a list of information that can be stored in the Kaikukortti register, including descriptions and purposes of use. The data can be divided into two groups: 1) The Kaikukortti register data entered by the social welfare or healthcare unit together with the cardholder (client) and 2) Register data on the usage of the card entered by the cultural operators, such as theatres, museums or commercial ticket agencies. The key information, i.e. unique identifier, is the Kaikukortti card number.

Information that can be stored in the register:

- Card number: the number identifies the card without any data that would identify the cardholder. The card number is key information with which information regarding the card is stored in and retrieved from the register.
- Year of birth: cardholder's year of birth, the cardholder is not obliged to disclose it. It is statistical demographic data by which the cardholders are divided into age groups (statistically not expressed at the level of exact age).

- Gender: cardholder's gender, the cardholder is not obliged to disclose it. It is statistical demographic data by which the cardholders are categorized by gender.
- Native language: cardholder's native language, the cardholder is not obliged to disclose it. It is statistical demographic data by which the cardholders are categorized by language.
- Postal code: postal code of cardholder's place of residence, the cardholder is not obliged to disclose it. It is statistical demographic data by which the cardholders are categorized by place of residence (statistically not expressed at the level of exact postal code).
- Life situation: cardholder's life situation, the options have been drawn from the life situation statistics used by Statistics Finland. The cardholder is not obliged to disclose it, it is statistical demographic data.
- Card's date of issue: Date when the card was issued, the information is used for calculating the card's length of validity.
- Issuing unit: name of social welfare or healthcare unit/organization that has issued the card. The information is statistical data that also serves as a key to the information the unit/organization has submitted itself.
- Name of employee: Name of the employee of the unit/organization who has issued the card. The information is used as contact information for communication between the unit/organization and the Culture for All Service in case of uncertainties regarding data on individual cards.
- Employee's professional title: The professional title of the employee who has issued the card, the information helps to identify the person who has issued the card.
- Remarks: Additional remarks entered by the employee of the social welfare or healthcare unit/organization who has issued the card regarding the filled form. The information is used for communicating the issuer's questions and clarifications to the Kaikukortti support team.
- Earlier card: information on whether the cardholder has had a Kaikukortti card before (answers yes or no). If an actor in the social welfare, healthcare and wellbeing sector officially adopts the use of the card after a pilot phase, a new card is issued. The information reveals if the cardholder has acquired a new card after a Kaikukortti pilot.

Information in the register on the usage of the card:

- Kaikukortti card number: the number identifies the card without any data that would identify the cardholder. The card number is key information with which information regarding the card is stored in and retrieved from the register.
- Name of cultural operator: name of the cultural venue (theater, festival etc.) where the card has been used, the information is used for compiling statistics and it also serves as a key to the information the venue has entered itself.
- Number of tickets for adults: Number of tickets for adults (always 1) acquired with a card, the information is used for compiling statistics.
- Number of tickets for children (under 16 yrs.): Number of tickets acquired for under 16-year-old children accompanying a cardholder, the information is used for compiling statistics.
- Name of event: Name of cultural event/performance (not compulsory), the information is used for compiling statistics.
- Date of event: Date of cultural event/performance (not compulsory), the information is used for compiling statistics.

The mentioned information is used for compiling statistics. The persons responsible for Kaikukortti activities in the different localities have access to data on their localities. Issuers of the card (actors in the social welfare, healthcare and wellbeing sector) only have access to their own unit's Kaikukortti data. The Kaikukortti support and development service has access to data on all the Kaikukortti localities. The cultural operators only see the ID code of the card. The publishable statistics are summaries of data from which no individual Kaikukortti cardholder can be identified.

6. Length of time the information is stored

The uncategorized, anonymous Kaikukortti data, serving the purpose of developing and compiling statistics on Kaikukortti, are stored for a maximum length of ten years.

7. Regular information sources

There are four parties that enter information in the register: a) The Kaikukortti support and development service of the Culture for All Service coordinates and assigns the ID code used in the Kaikukortti card (card number), b) Clients of the social welfare or healthcare units who have acquired the card fill in their personal details, on a voluntary basis, i.e. the clients can decide what information they give (see Section 5), c) The units that issue the card (e.g. social services office, club houses) enter their own information as operators, and d) The cultural operators (e.g. theaters, festival organizers, adult education centres) enter how many tickets or course places have been acquired, with a card of what number, for events or courses they have organized.

8. Regular information sharing and transfer of information outside the EU or EEA

The social welfare and healthcare units and the cultural operators deliver the information they have recorded to the persons responsible for Kaikukortti activities in their respective sectors, who compile the local aggregate statistics as well as anonymous categorized statistics, which can be used for the assessment and development of the activities of the social welfare and healthcare sector and the cultural sector at municipal and regional level. The Kaikukortti support and development service uses the information for promoting the use of Kaikukortti and reporting on and developing the Kaikukortti system.

The information is not transferred further for direct marketing purposes or outside the EU or EEA.

9. Principles of registry protection

The data in the electronic Kaikukortti register are stored in the protected server of the Culture for All Service. All the data in the register can only be accessed by the Culture for All Service. Access to the data is restricted to system administrators who are identified by their username and password.

The persons in the social welfare and healthcare sector and the cultural sector locally responsible for the Kaikukortti activities are responsible for and commit themselves to protecting the local Kaikukortti data.

10. Automated individual decisions

Automated individual decisions (Article 22 of the EU General Data Protection Regulation) are not made.

11. Rights related to the use of personal information

The right to data inspection

The name, social security number, phone number or address of the Kaikukortti users are not collected at any stage. The statistics compiled based on the collected demographic data and data on the usage of the card cannot be linked to any individual person.

Right to be forgotten

The personal data in the Kaikukortti register are anonymized, so the right to be forgotten does not pertain to the register.