

May 25, 2018

## Posti item tracking

### **Posti item tracking is the responsibility of Posti Ltd**

Posti Ltd (hereinafter Posti) collects, discloses and otherwise processes personal data relating to sent items in accordance with the Postal Act, data protection regulations and other applicable laws, and on the basis of the consent of the data subject, or by his or her assignment, or based on the customer relationship.

### **Posti item tracking is the responsibility of:**

**Posti Ltd** (Business ID 0109357-9)  
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**Street address: Postintaival 7 A, Helsinki**  
**Tel. +358 20 4511**

**Data Protection Officer:** [tietosuoja@posti.com](mailto:tietosuoja@posti.com)

### **Purposes and legal basis of the processing of data:**

#### **In item tracking, Posti processes data related to sent items**

The purpose of Posti item tracking is to track the progress of the delivery of items sent through Posti and enable correct delivery and any payment related to it. Furthermore, the aim is to collect and provide real-time event data on any deviations in mail delivery

- 1) in order to inform the recipient of the shipment of the arrival of the item for delivery or pick-up,
- 2) in order to inform the sender that the item has been handed over,
- 3) internally to Posti employees for process control, quality control, safety, as well as maintenance and development of the service and systems, and
- 4) to other postal and transport companies for process control, as well as to the authorities.

Item tracking data can also be used for customer surveys in order to develop Posti's services and monitor their quality.

In the above-mentioned cases, the legal grounds for processing personal data are the fulfillment of Posti's statutory obligations (for example, the Postal Act and Accounting Act), compliance with the contract with the customer or Posti's legitimate interest (for example, customer surveys, product development and statistics).

### **Data processed and its retention**

Posti's sorting process produces personal data, including item-specific event and identification information on the recipient and image material used for this purpose.

May 25, 2018

Data concerning individual items is stored in the system from the start of the delivery process up to the handing over of the item, as well as for the duration of the compensation claim time related to the delivery (18 months) for investigations conducted for the sender and the authorities.

Information on the delivery of the item and digitized images of paper-based delivery documents are retained for 3 years and 3 months.

Information related to the delivery of the item may include:

- unique identifier of the item
- item classification (service and additional service) according to Posti's service types
- weight and any insured value of the item
- recipient's name and contact details, such as address, telephone number and/or e-mail address
- name of the person who signed the delivery and image of the signature
- personal identity number or its suffix and information on the document used for the verification of identity
- item content and customs declaration information

A proxy given for receiving an individual item is stored for 3 years and 3 months, and a fixed-term proxy is stored for 6 years.

The following information related to items is stored in Item Tracking:

Information on delivery:

- unique identifier of the item
- item classification (service and additional service) according to Posti's service types
- weight and value of the item
- postal code of the delivery address
- item content and customs declaration information

If the sender has provided the item reference data electronically, the following information is also stored:

- recipient's first name and last name and/or company's or organization's name and Business ID, mail address, telephone number and/or e-mail address for sending the electronic notice of arrival
- sender's first name and last name and/or company's or organization's name and Business ID, mail address, telephone number
- delivery date and time
- identifier of the party that delivered the item.

If the delivery service includes receipt confirmation, the following information is also stored:

- recipient's first name and last name, personal identity number or its suffix, signature. If the recipient has given a proxy, the name and personal identity number of the authorized person and information on the content of the proxy are also stored.

If delivering the item requires a payment (e.g. a cash-on-delivery item), the register may contain the payee's and payer's bank account numbers or other banking details related to the payment. Data will be retained for a duration specified in the Accounting Act, six years at the most.

May 25, 2018

### **Sources of data**

Posti's process generates some of the information specified above. Some data is obtained from other postal and transport companies.

The sender of the item provides the data required for delivering the item on a case-by-case basis.

Upon delivering the item, if the service includes confirmation of receipt and verifying the recipient's identity, the recipient provides the information specified above to Posti for archiving either on a paper receipt or electronically. The recipient may provide Posti with a proxy for receiving an individual item or mail in general. An image of the proxy is stored in Posti's electronic archive.

### **Data is only disclosed in conjunction with delivery**

Data on individual delivery transactions is disclosed from Posti's item tracking system via a public web service only on the basis of the shipment code, without further detailed personal or identifying information.

Shipment control data is transmitted to other postal and transport companies (name and address details of the sender and recipient, telephone number and/or e-mail address) for the purpose of implementing the service. Investigating missing, damaged or delayed shipments may also require the transfer of personal data to other postal and transport companies.

All data pertaining to the sent item can be disclosed to the sender, except for the personal identity number.

The public web service can be accessed from any country.

Real-time tracking information on deliveries is sent outside the EU or EEA when the item in question is sent from or to a country that is outside the EU or EEA. In connection with data transfer, personal data is not generally disclosed to countries outside the EU and EEA, but only registration data related to the shipment code (shipment code, date and time, registered by), unless otherwise required by legislation or international treaties. For example, in the case of shipment of goods to the United States, the sender and recipient data, as well as information on the weight and contents of the consignment has to be sent to the US for customs clearance. Such transfer of data will take place under conditions specified in the data protection legislation (exceptions for special situations).

In connection with the processing of items, address information may also be viewed by delivery companies subcontracting for Posti or partners that operate Posti's outlets.

Due to the technical processing of data, some of the data may be physically situated on external subcontractor servers or hardware, through which they are processed via a technical interface. Personal data is not transferred outside the European Union or the European Economic Area, unless it is necessary for the technical implementation of the service. The precondition for disclosing and transferring data is that the companies, authorities and organizations receiving and processing the data have signed an agreement with Posti that includes the standard clauses approved by the EU Commission, ensuring the lawful processing of the data.

May 25, 2018

### **The data is safe**

Posti stores the information in databases protected with firewalls, passwords, and other technological measures. The databases and their backups are located in locked and guarded premises, and the data can be accessed only by designated persons.

Paper receipts containing the delivery information collected from recipients upon delivery are immediately sent for archiving in a closed envelope in accordance with a process that has been audited for information security.

Posti's personnel and subcontractors, as well as persons processing the archived delivery data, are bound by a confidentiality obligation with regard to what they learn about a customer or his/her affairs while performing their duties.

In the real-time online item tracking service for senders and recipients, data can only be accessed with a unique shipment code. That data only contains event data related to the progress of the item - no personal data related to the sender or recipient is available in the service. Data searches on deliveries cannot be made using the recipient's or sender's name or address.

### **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.

The easiest way to check one's data is to visit [www.posti.fi/omatpalvelut](http://www.posti.fi/omatpalvelut). When logged in, data subjects can also submit a request for a review of their personal data.

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 to [asiakaspalvelu@posti.com](mailto:asiakaspalvelu@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).