

# File description and privacy policy

## Customer register of Järva Vald mobile application

### 1. Controller

City of Järva  
Pikk tn 56, Järva-Jaani, Järva  
73301 Järva maakond

### 2. Contact person responsible for the register

Maarja Kauge  
maarja.kauge@jarva.ee  
Tel. 5854 5190

### 3. Register name

Customer register of Järva mobile application

### 4. Legal foundation and purpose of processing personal data

The personal data collected by the application can be used for the following purposes:

- Inquiries, service development, involvement, and processing of customer feedback
- Communication and notifying of topical matters in the municipality
- Sharing the content uploaded to the service with other users

### 5. Data content of the register

The data to be stored in the register:

- Individualizing information potentially given when the application is taken to use, such as name, date of birth, and gender
- Response content provided by users
- Manufacturer and equipment type of the user's equipment. The technical type of the equipment cannot be linked to any individual user

### 6. Regular sources of information

The data to be stored in the register are derived from the mobile application users on a regular basis through the functionalities included in the application, such as a feedback form.

### 7. Regular disclosures of data and data transfer outside the EU or EEA

The data shall not, by rule, be disclosed to third parties. The data can be published to the extent that has been agreed upon with the customer.

The controller can transfer the data also outside the EU or EEA.

If you are disclosing personal data to third parties, mention here the potential recipients or categories of recipients.

## 8. Register protection principles

The data in the register shall be processed with care, and the data processed by information systems shall be duly protected. When register data is stored on Internet servers, both the physical and digital information security of those devices is duly taken care of. The controller shall ensure that the stored data and access rights to servers and other information of critical importance for the security of personal data shall be processed confidentially and only by those employees whose work it is a part of.

## 9. Right of inspection and right to claim rectification of the data

Every person in the register ('data subject') has the right to inspect the data stored about him/her in the register and claim rectification of any faulty data or supplementation of incomplete data. If a person wants to inspect the data stored about him or her and claim rectification, the request shall be sent to the controller by e-mail. The controller may, if necessary, ask the requesting person to prove his/her identity. The controller shall reply to the customer as provisioned in the General Data Protection Regulation of the EU (principally within one month).

## 10. Other rights related to the processing of personal data

Any data subject has the right to request the personal data concerning him/her to be erased from the register ('right to be forgotten'). Similarly, the data subjects have other rights compliant with the [General Data Protection Regulation of the EU](#) such as restriction of the processing of personal data in specific situations. The requests shall be submitted in writing to the controller. The controller may, if necessary, ask the requesting person to prove his/her identity. The controller shall reply to the customer as provisioned in the General Data Protection Regulation of the EU (principally within one month).

# Privacy policy for Järva Vald

## 1. What kind of information of the user can be collected?

We collect information about the user that is necessary for the purposes described in clause 3 of this privacy policy. The purpose of use determines what kind of information is collected about the user in each situation.

Profile information provided by the users:

- Name, date of birth, and postal code area
- Log-in information if any
- Feedback and initiatives
- Areas of interest provided by the user
- Replies given by the user
- Other data collected with the user's permission

Observations of data from service usage

- Basic information of the user's terminal equipment
- Location data, such as coordinates calculated with the help of GPS or WLAN connection points or base stations of a mobile network, if specifically permitted by the user
- Other data collected with the user's permission

## **2. What sources is the data collected from?**

User data is collected from the users themselves in the form of profile data, the answers and any feedback given. In addition, we can collect data of the use of the application.

## **3. For what purpose is the data collected?**

We process personal data for predetermined purposes, such as:

- Development of the city and its services
- Application development
- Collection of feedback
- Targeted communication

## **4. How is user data stored?**

We process data provided by the user with which we might be able to recognize the user as well as data observed from the use of the service in separate databases.

## **5. For how long is user data stored?**

We will store the data only for as long as necessary for the realization of the purposes defined in clause 3 pursuant to valid legislation related to the processing of personal data.

## **6. Who processes user data?**

An employee possessing administrator's rights to our data system can process personal data pursuant to valid legislation related to the processing of personal data.

We do not transfer data outside the EU or EEA. If we transfer data outside the EU or EEA, we will ensure that the personal data is duly protected by agreeing, for example, on matters related to the confidentiality and processing of personal data as required by legislation, for example by using the model contractual clauses adopted by the European Commission, and otherwise so that the processing of personal data takes place in accordance with this privacy policy.

## **7. Is my personal data disclosed to third parties?**

We do not sell, lease or disclose the personal data of an identified user to third parties. We can disclose the personal data of a user by means required by competent authorities or other parties based on valid legislation related to the processing of personal data.

## **8. How is the user's personal data protected?**

We use all necessary technical and organizational information security means to protect personal data against unauthorized access, disclosure, erasure or other unlawful processing. These means include, for example, the use of firewalls, encryption techniques, secure equipment bays, appropriate access control, controlled granting of access rights and controlling their use, use of encryption techniques and guidance of personnel participating in the processing of personal data.

## **9. Does the application use cookies?**

We can collect data concerning the user's terminal equipment using cookies and other corresponding techniques. A cookie is a small text file which the browser stores in the terminal equipment of the user.

### **10. Is it possible that a third party is collecting user data?**

We may have so-called social plugins in use if the user logs in to the application using for example Facebook or Google identifiers.

Our application may also contain links to external websites, but we hold no responsibility for the privacy protection practices of or the content on these sites. We recommend for you to familiarize yourself with the terms of each site concerning the protection of privacy.

### **11. Which terms of protection of privacy are applied when using the mobile application?**

In addition to this privacy policy, the terms of the service provider are also applied for our mobile applications made available through Apple Store, Google Play or Microsoft Store.

### **12. Is the location data of the user's terminal equipment used?**

The location data of the user's terminal equipment can be used to provide location-based services. These kinds of services can be, for example, targeted queries or communication. The use of location data requires, however, acceptance from the user.

### **13. What kind of possibilities does the user have to make an impact?**

The user can affect the data collection and its exploitation. The user has the right to inspect any information stored about him/her. By request from the user, we will rectify, erase or complement any information that is faulty, useless, incomplete or outdated for its processing. The user may inspect his/her personal data by contacting the controller.

The user may give his/her consent for the use of location data from the settings of the terminal equipment and the application. Similarly, with the help of the settings, the user may, at any time, also cancel the consent given.

### **14. Can this privacy policy be amended?**

The city Järva is constantly developing its services, and we reserve the right to amend this privacy policy by giving a notification through our service. The changes may also be based on changes in legislation. We recommend for you to carefully familiarize yourself with the content of this privacy policy.

Latest update

18/05/2018