Drawn up: 16 May 2018. Last updated: 30 August 2026.

Athene Member Register Privacy Notice

This is a privacy notice under the EU General Data Protection Regulation (GDPR).

1. Data controller

Informaatioverkostojen kilta Athene ry (Athene)

Konemiehentie 2, 02150 Espoo, Finland

2. Contact person for the register

Treasurer Topi Eskelinen

rahastonhoitaja@athene.fi

3. Name of the register

Athene's member register (Athenen jäsenrekisteri)

4. Legal basis and purpose of processing

Personal data is processed on several legal bases depending on the purpose:

- A legal obligation under section 11 of the Finnish Associations Act (503/1989) to maintain a member register and keep members' contact details up to date.
- The controller's legitimate interest in administering memberships, membership applications, and related communication.
- Performance of a contract, for charging and processing the membership fee payment.
- A legal obligation under the Finnish Accounting Act (1336/1997) to retain accounting vouchers for the period the law requires.
- Consent, where a member chooses to join Athene's email newsletter list. Consent can be withdrawn at any time – see section 12.

5. Contents of the register

The register may hold the following data:

- Basic details: full name, email address, home municipality.
- Membership details: AYY membership status, membership type (e.g. regular or external member), and the start and end dates of membership periods.
- Application details: the name, email, home municipality and study programme given in the application, and any rejection reason recorded by the board.
- Payment details: the amount and date of the membership fee, and an identifier linked to the transaction at the payment provider, Stripe. Athene does not process or store card details, for they are handled solely by Stripe.
- Communication preferences: whether the member has joined the email newsletter list, and the date consent was given or withdrawn.
- Technical identifiers: one-time login links (“magic links”), which are deleted after use or expiry.

For board members' admin accounts, we additionally store name, email address, role, and the Google account used to sign in.

6. Regular sources of information

Data recorded in the register comes from:

- individuals applying to join the guild, via the membership application form (available in Finnish and English);
- members themselves, when they update their details in the member portal or notify the controller of a change;
- the payment provider Stripe, when a payment transaction is confirmed;

- board meeting decisions confirming a member's membership type.

Keeping information up to date is primarily the member's own responsibility.

7. Disclosure of data and transfers outside the EU/EEA

Athene uses the following external service providers (data processors) to maintain the register:

- Stripe (payment processing). Stripe processes payment data within the EU, under a data processing agreement (DPA).
- Microsoft Azure (application and database hosting, and sending emails via Azure Communication Services). The service is located within the EU, and processing is covered by the Microsoft Products and Services DPA.
- Google (OAuth sign-in for board members' admin accounts).

If a member has separately consented to join the email newsletter list, their email address is transferred to Google Groups solely for that purpose – see section 12.

Data is not disclosed to any other third parties, and is not transferred outside the EU/EEA beyond the processors listed above.

8. Principles of protecting the register

The register is maintained electronically in the Microsoft Azure cloud. Access to the data is restricted by user role (superadmin, member administrator, communications administrator, board member), and board members must sign in with an organization-owned Google account. Members authenticate to their own data via a one-time email link. Access rights for outgoing board members are removed at the change of term, per Athene's internal data protection policy. Every change made to the register is logged, recording what was changed and by whom, and the log entries never contain the personal data itself.

9. Right of access and right to rectification

Every individual in the register has the right to check the data held about them. A logged-in member can download their full record from the member portal. Data can also be requested, or a correction required, by contacting the person named in section 2. The controller may ask the requester to verify their identity where necessary. Requests are answered within a reasonable time, generally within one month.

10. Right to erasure

A member may request that their data be erased at any time, including during an active membership. Erasure is carried out by anonymisation: the name, email address, home municipality and other identifying details are permanently removed, but membership and payment history is retained in de-identified form for the guild's statistics and grant reporting. The Stripe identifier on a payment record is kept for as long as the Accounting Act requires (see section 11), after which the payment record also becomes fully anonymous. If the member had joined the newsletter list, please note that an erasure request does not automatically remove the address from Google Groups – this is carried out separately on request.

11. Retention period

Active members' data is retained for the duration of membership. When a membership ends and is not renewed, data is retained by default for two (2) years from the end of the member's last active membership period, after which it is anonymised. The board may change the length of this retention period. Data from an application that was not approved is anonymised on the same basis, two years after submission. Accounting records related to payments (including the Stripe identifier) are retained for as long as the Accounting Act requires, approximately six (6) years, even where the member's other personal data has already been anonymised.

12. Mailing lists

Athene maintains a separate email newsletter list, hosted on Google Groups. Joining the list is based on the member's separate, voluntary consent, which can be given on the membership application form or later in the member portal. Consent can be withdrawn at any time in the member portal. Withdrawal applies only to the newsletter: it does not affect mandatory membership-related communication (e.g. login links, and messages about an application, membership, or renewal), which is based on the membership relationship rather than consent. Since the list is hosted on Google Groups, removing an address from the list after consent is withdrawn is a manual step, carried out within a reasonable time.

13. Right to lodge a complaint with a supervisory authority

If a data subject considers that their personal data has been processed in breach of applicable data protection law, they have the right to lodge a complaint with the competent supervisory authority. In Finland, this is the Office of the Data Protection Ombudsman (tietosuoja.fi).

This privacy notice is also available in Finnish (Athenen jäsenrekisterin tietosuojaseloste). The notice is reviewed annually when the board changes, by 31 January at the latest, and whenever the register's data or processing changes materially.