

# Customer Register – Privacy Policy

<b>Date of drafting</b>	26 February 2021
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<b>Contact person in matters concerning the register</b>	Jari Virtanen Raviraitti 3 + 358 (0)50 348 1338 jari.virtanen@econetgroup.fi
<b>Name of the register</b>	Customer register
<b>Legal basis and purpose of processing personal data. Is the provision of information a legal or contractual requirement</b>	<p>The purpose of the register is to maintain the organisation's customer register, to manage, archive and process customer orders, and to manage customer relationships.</p> <p>The data can be used to develop operations, for statistical purposes, and to produce more personalised targeted content in our online services.</p> <p>Personal data is processed within the limits permitted and required by the GDPR.</p> <p>The data in the register can be used in the organisation's own registers, for example, to target advertising without disclosing personal data to third parties. The organization may use partners to maintain customer and service relationships, in which case parts of the register data may be transferred to the partner's servers due to technical requirements.</p> <p>The data shall only be processed for the purpose of maintaining the customer relationship of the controller organisation through technical interfaces.</p> <p>The organization has the right to publish the information contained in the customer register as an electronic or written list unless the customer specifically prohibits it. This may mean such lists as used in conjunction with, e.g., mailing labels for direct mail or similar. The customer has the right to prohibit the publication of the data by notifying the controller's customer service department by e-mail (e-mail address) or the contact person for the register.</p>
<b>Ground of legitimate interest</b>	The legal basis for the data processing is a contract
<b>Categories of the personal data concerned</b>	Name, organisation represented, contact details, billing information
<b>Recipients and categories of recipients</b>	Controller's personnel and outsourcing partners (financial administration), where applicable
<b>Consent</b>	
<b>Data content of the register</b>	<p>The personal data file contains the following information:</p> <ul style="list-style-type: none"><li>- Person's first and last name</li><li>- The entity represented</li><li>- E-mail address</li><li>- Mailing address</li><li>- Telephone number</li><li>- Web address</li><li>- IP address</li></ul>

	- Information about previous orders
<b>Regular sources of information</b>	<p>Information is obtained in connection with the customer's registration(s) and the notifications made by the customer during the customer relationship. Updated name and contact information are also received from authorities and from companies providing update services.</p> <p>Data may also be obtained from subcontractors related to the use or production of the service.</p> <p>Information about other activities of customers in digital environments can be obtained from partners' websites, information systems or other digital sources that are logged in to via an electronic invitation (link), cookies or by using the IDs provided to customers.</p> <p>The information in the customer register is only available to the organisation, except when using an external service provider either to provide a value-added service or to support a credit decision.</p> <p>The data will not be disclosed outside the organization or for the use of its partners, except in matters related to credit applications, debt collection, invoicing, and/or when required by law.</p> <p>Personal data will not be transferred outside the European Union unless it is necessary for the data controller or its partner to ensure a technical implementation. The personal data of the registered person will be destroyed at the request of the user, unless legislation, open invoices or debt collection measures prevent the data from being deleted.</p>
<b>Retention period for personal data</b>	10 years from the end of the customer relationship.
<b>Regular disclosure of data</b>	<p>The information in the customer register is only available to the organisation, except when using an external service provider either to provide a value-added service or to support a credit decision.</p> <p>The data will not be disclosed to non-interested parties by the controller or for the use of the controller's partners, except in matters related to credit applications, debt collection, invoicing, and/or when required by law.</p> <p>The personal data of the registered person will be destroyed at the request of the user, unless legislation, open invoices or debt collection measures prevent the data from being deleted.</p>
<b>Transfer of data outside the EU or EEA</b>	Personal data will not be transferred outside the European Union unless it is necessary to ensure the technical implementation of the organisation or its partner.
<b>Principles of register protection A: Manual material</b>	<p>The contact information collected in customer transactions and other manually processed documents containing customer data shall be stored in locked and fireproof storage facilities after initial processing.</p> <p>Only certain employees who have signed a non-disclosure agreement shall have the right to manually process stored customer data.</p> <p>The protection and processing of data in the register shall comply with the provisions and principles of the Data Protection Act, the regulations of the authorities and good data processing practices.</p>
<b>Principles of register protection B: Computerised activities</b>	<p>Only certain employees of the organization and companies operating on its behalf have the right to access the client-owner and customer register and maintain its data. Each specified user has their own personal username and password.</p> <p>Each user has signed a non-disclosure agreement. The system is protected by a firewall, which protects external contacts to the system.</p> <p>The protection and processing of data in the register complies with the provisions and principles of the Data Protection Act, the regulations of the authorities and good</p>

	data processing method.
<b>Cookies</b>	<p>We use cookies on our website. A cookie is a small text file that is sent to and stored on the user's computer. Cookies do not harm a user's computers or files. The primary purpose of the use of cookies is to improve and customize the visitor's user experience on the site, as well as to analyse and improve the functionality and content of the site.</p> <p>The information collected with the help of cookies can also be used to target communications and marketing and to optimize marketing measures. Site visitors cannot be identified by cookies alone. However, information obtained through the use of cookies may be linked to information obtained from the user in other contexts, for example, when the user fills in a form on our website.</p> <p>Cookies are used to collect the following types of information:</p> <ul style="list-style-type: none"> <li>- The visitor's IP address</li> <li>- Time of visit</li> <li>- Pages browsed and page view times</li> <li>- Visitor's browser type</li> </ul> <p><b>Your rights</b> A user visiting our website has the opportunity to prevent the use of cookies at any time by changing their browser settings. Most browsers allow you to turn off the cookie function and delete cookies that have already been stored.</p> <p>Blocking the use of cookies may affect the functionality of the site.</p> <p><b>GOOGLE ANALYTICS</b> The website collects usage statistics for the Google Analytics service, the purpose of which is to track, develop and plan the marketing of the site. The data collected cannot be used to identify information in relation to an individual user or person.</p> <p>In addition, the website uses the collection of target group information and subject matter information (Google Analytics Demographics), which is used to record the user's age, gender, and the user's areas of interest, among other things. You can change the settings related to the collection of this information in your own Google Account at <a href="https://www.google.com/settings/ads">https://www.google.com/settings/ads</a></p> <p>You can disable Google Analytics tracking with the Chrome browser add-on if you wish.</p>
<b>Automated processing and profiling</b>	
<b>The right of access, i.e., the right of access to personal data.</b>	<p>The data subject has the right to check what information about him or her is stored in the register. The access request must be made in writing by contacting the controller's customer service or the contact person of the register in Finnish or English. The access request must be signed.</p> <p>The data subject has the right to prohibit the processing and disclosure of their data for the purposes of direct advertising, telesales and direct marketing, as well as market research and opinion polls, by contacting the controller's customer service department.</p>
<b>Right to data portability</b>	<p>The data subject has the right to transfer their own data from one system to another. The transfer request can be addressed to the contact person of the register.</p>
<b>Right to request rectification of data</b>	<p>Personal data in the register that is incorrect, unnecessary, incomplete or outdated in terms of the purpose of processing must be rectified, erased or supplemented.</p>

	<p>The request or rectification must be submitted in writing, signed by hand, to the customer service of the business organisation or to the administrator of the personal data file.</p> <p>The request must specify which data is required to be rectified and on what basis. Rectifications shall be carried out without delay.</p> <p>The person from whom the incorrect data has been obtained or to whom the data has been disclosed will be notified of the rectification of the error(s).</p> <p>In the event of refusal of a request for rectification, the person in charge of the register shall issue a written statement stating the reasons for which the request for rectification has been refused.</p> <p>The person concerned may refer the refusal to the Office of the Data Protection Ombudsman for a decision.</p>
<b>Right of restriction</b>	<p>The data subject has the right to request the restriction of data processing, for example, if the personal data in the register is incorrect. Contact the person in charge of the register.</p>
<b>Right to object</b>	<p>The data subject has the right to request personal data concerning him or her and the data subject has the right to request the rectification or erasure of personal data. Requests can be addressed to the contact person of the register.</p> <p>If you act as a contact person for a company or organization, your data cannot be deleted during this time.</p>
<b>Right to lodge a complaint with a supervisory authority</b>	<p>If you consider that the processing of personal data concerning you has violated the GDPR, you have the right to lodge a complaint with a supervisory authority.</p> <p>You can also lodge a complaint in the Member State where you have your habitual residence or place of work.</p> <p>The contact details of the national supervisory authority are: Office of the Data Protection Ombudsman PO Box 800, Ratapihantie 9, 00521 Helsinki, Finland tel.+358 (0)29 56 66700 tietosuoja@om.fi www.tietosuoja.fi</p>
<b>Other rights related to the processing of personal data</b>	<p>The data subject has the right to prohibit the disclosure and processing of their data for direct advertising and other marketing, to demand the anonymization of the data where applicable, and the right to be completely forgotten.</p>