## Online Visitor Register – Privacy Policy

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Contact person in matters concerning the register	Jari Virtanen Raviraitti 3 + 358 (0)50 348 1338 jari.virtanen@econetgroup.fi
Name of the register	Online visitors register
Legal basis and purpose of processing personal data. Is the provision of information a legal or contractual requirement	The purpose of the register is to ensure the security of the company's website. The information provided (IP address) is only used in conjunction with investigating a fault or a data breach.  The basis for processing is legitimate interest.
Ground of legitimate interest	General online security and conduct.  The legitimate interest of the controller in the processing of the personal data collected and used is based on the freedom to conduct a business.
Categories of the personal data concerned	IP address, time of visit and pages visited.
Recipients and categories of recipients	Limited, authorised personnel of the web hosting server providing the service.
Consent	
Data content of the register	The personal data file contains the following information: - IP address - Online visiting hours - Pages visited by a visitor
Regular sources of information	Information is obtained from the customer's online visits to the organisation's website.
Retention period for personal data	Data is never explicitly deleted.
Regular disclosure of data	The data in the register is only available to the company, except when using an external service provider.  Data will not be disclosed outside the company or to its partners, except in the event of data breaches and the like.
Transfer of data outside the EU or EEA	Personal data will not be transferred outside the European Union unless it is necessary for the technical implementation of the company or its partner.

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Principles of register protection A: Manual material	
Principles of register protection B: Computerised	Only designated employees of the organisation and companies acting on its behalf are entitled to access the website maintenance server.
activities	Each defined user has their own personal username and password. Each user has signed a non-disclosure agreement.  The system is protected by a firewall, which protects external contacts to the system.
	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.
Cookies	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.
	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.
	Cookies are used to collect the following types of information:
	- The visitor's IP address - Time of visit
	<ul><li>- Pages browsed and page view times</li><li>- Visitor's browser type</li></ul>
	Your rights
	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.
	Blocking the use of cookies may affect the functionality of the site.
	GOOGLE ANALYTICS  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.
	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 https://www.google.com/settings/ads
	You can disable Google Analytics tracking with the Chrome browser add-o if you wish.
Automated processing and profiling	3

The right of access, i.e., the right of access to personal data.	The data subject has the right to check what information about him or her is stored in the register. The request for verification must be made in writing by contacting the company's customer service department or the contact person of the register in Finnish or English. The access request must be signed.  Data subjects have the right to object to the processing and disclosure of their data for direct marketing, telesales and direct selling, market research and opinion polling by contacting the company's customer service department.  The controller is entitled to levy a charge on such requests if they incured to a physician the information.
Right to data portability	costs in obtaining the information.  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.
Right to request rectification of data	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.
	The request for rectification must be hand-signed and submitted in writing to the company's customer service department or to the administrator of the personal data file.
	The request must specify which data is required to be rectified and on what basis. Rectifications shall be carried out without delay.
	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). 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. The person concerned may refer the refusal to the Office of the Data Protection Ombudsman for a decision.
Right of restriction	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.
Right to object	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.
	If you act as a contact person for a company or organization, your data cannot be deleted during this time.
Right to lodge a complaint with a supervisory authority	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.
	You can also lodge a complaint in the Member State where you have your habitual residence or place of work.
	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
Other rights related to the processing of personal data	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.