Prospects and Potential Customers – Privacy Policy

Date of drafting	26 February 2021
Controller	Dewaco Oy Raviraitti 3 + 358 (0)50 348 1338 jari.virtanen@econetgroup.fi
Contact person in matters concerning the register	Jari Virtanen Raviraitti 3 + 358 (0)50 348 1338 jari.virtanen@econetgroup.fi
Name of the register	Prospects and potential customers
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 facilitate the controller's business operations, the opening of new customer relationships and the related communications. The information obtained is used to create and maintain customer relationships and for other business needs of the controller. The basis for processing is legitimate interest.
Ground of legitimate interest	Initiation of customer relationships, negotiations, and other activities related to the controller's business.
	The controller's legitimate interest in the processing of personal data collected and used is based on direct marketing needs and the freedom to conduct a business. Direct marketing is a legitimate interest of the company in accordance with the EU General Data Protection Regulation.
Categories of the personal data concerned	Name, organisation represented, contact details
Recipients and categories of recipients	The controller's personnel and outsourcing partners, where applicable (financial management, marketing, IT maintenance).
Consent	
Data content of the register	The personal data file contains the following information: - Person's first and last name - The entity represented - E-mail address - Mailing address - Telephone number - web address - IP address - Information about previous orders - Discussion information about customer relationship negotiations
Regular sources of information	Information is obtained from e-mail messages, business cards, telephone enquiries received from the customer, or through face-to-face meetings.
	Information can also be obtained from other stakeholders, e.g., through mass communication, marketing, the company's online contact form etc.
	The data will not be disclosed outside the organisation keeping the register or for the use of its partners, except for credit applications, debt collection or

	in matters related to invoicing and when required by law. 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, the manageability of the customer relationship, open invoices or debt collection measures prevent the deletion of the data.
Retention period for personal data	Personal data is stored for 10 years from the end of the customer relationship.
Regular disclosure of data	The data in the register is only available to the controller and its personnel except when using an external service provider either to provide a value-added service or to support a credit decision. The data will not be disclosed outside the organisation that maintains the register or for the use of its partners, except in matters related to credit application, debt collection or invoicing, as well as when required by law.
	The personal data of the registered person will be destroyed at the request of the user, unless legislation, the manageability of the customer relationship, open invoices or debt collection measures prevent the deletion of the data.
Transfer of data outside the EU or EEA	Personal data will not be transferred outside the European Union unless it is necessary to ensure the technical implementation of the controller or its partner.
Principles of register protection A: Manual material	Manually processed documents containing customer data (e.g., printed emails or their attachments, printed web forms or similar) are stored in locked and fireproof storage facilities after initial processing.
	Only certain employees who have signed a non-disclosure agreement shall have the right to manually process stored customer data.
	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.
Principles of register protection B: Computerised activities	Only certain employees of the organization and companies acting on its behalf have the right to use, for example, the use of workstations, the software of which can be used to maintain the data of potential customers. Each specified user has their own personal username and password. Each user has signed a non-disclosure agreement.
	The system is protected by a firewall that secures external contacts to the system and workstations with suitable security software.
	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 - Pages browsed and page view times
	- Visitor's browser type
	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-on if you wish.
Automated processing and profiling	
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 access request must be made in writing by contacting the controller's customer service department or the contact person of the register in Finnish or English. The access request must be signed. 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.
Right to data portability	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 correction request must be made by the individual concerned, with a signed written request to the customer service department of the organization that maintains the register or to the administrator of the personal data register.
	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.