

## PRIVACY POLICY

### ISV Kluuvi Oy customer registry privacy policy

#### 1. Controller

Controller: ISV Kluuvi Oy (1895533-1)

The contact person on registry issues is: Magnus Rosenberg, Marketing Manager, [markkinointi@kluuvi.fi](mailto:markkinointi@kluuvi.fi)

#### 2. Name of the registry

The name of the registry is Kluuvi's customer registry.

#### 3. Purpose of the processing of personal data

Personal data is processed for purposes related to the management, administration, and development of the customer relationship, the provision and delivery of services, and the development and invoicing of services. Personal data is also processed for the purposes required to clarify possible complaints and other claims.

In addition, personal data is processed in communications to customers, such as for information and news purposes and in marketing, as part of which personal data are also processed for purposes related to direct marketing and electronic direct marketing.

The customer has the right to prohibit direct marketing directed at him/her.

The controller processes the data himself/herself and utilizes subcontractors acting on behalf and for the account of the controller in the processing of personal data.

#### 4. Legal bases for the processing

The legal bases for the processing of personal data are the following in accordance with the EU General Data Protection Regulation (hereinafter also referred to as the "GDPR"):

1. the data subject has consented to the processing of his or her personal data for one or more specific purposes (Article 6 1.a of the GDPR);
2. processing is necessary for the performance of a contract to which the data subject is a party or in order to take pre-contractual measures at the request of the data subject (Article 6 (1b) GDPR);
3. processing is necessary for the legitimate interests of the controller or of a third party

(Article 6 (1f) GDPR).

The above legitimate interest of the controller is based on a relevant and appropriate relationship between the data subject and the controller, resulting from the fact that the data subject is a customer of the controller and when the processing is for purposes which the data subject could reasonably have expected at the time the personal data were collected and in the context of an appropriate relationship.

## **5. Data content of the registry (categories of personal data to be processed)**

The registry contains, in principle, the following personal data on all registered persons:

1. basic information and contact details of the person: first name, surname, address, telephone number, e-mail address;
2. information related to the person's company or other organization and the person's position or job title in question in the company or organization;
3. personal marketing authorizations and prohibitions.
4. marketing classification information (e.g., newsletter subscriber, campaign participant, industry, etc.)

## **6. Regular sources of information**

Personal information is collected from the registered person himself/herself.

Personal data shall also be collected and updated, within the limits of the applicable law, from publicly available sources related to the performance of the customer relationship between the controller and the data subject and through which the controller fulfills his/her responsibilities for the maintenance of the customer relationship.

## **7. Retention period of personal data**

The data collected in the registry shall be kept only for as long and to the extent necessary in relation to the original or compatible purposes for which the personal data were collected. The need to retain personal data shall be assessed annually, and in any case, the data relating to the data subject shall be deleted from the registry five years after the end of the data subject's customer relationship with the controller and the fulfillment of the customer relationship obligations and measures. For example, accounting documents are kept for five years from the end of the financial year.

The controller shall regularly assess the need for data retention in accordance with his/her internal code of conduct. In addition, the controller shall take reasonable steps to ensure that personal data which are inaccurate, incorrect, or out of date for the purposes of processing are deleted or rectified without delay.

## **8. Recipients of personal data (groups of recipients) and regular disclosures of data**

Personal data will not be disclosed to third parties.

## **9. Data transfer outside the EU or the EEA**

Personal data contained in the registry will not be transferred outside the EU or the EEA.

## **10. Registry protection principles**

Materials containing personal data shall be kept in locked premises accessible only to designated and authorized persons.

The database containing personal data is held on a server, which is stored in a locked state, which can only be accessed by designated and authorized persons. The server is protected by an appropriate firewall and technical protection.

Access to databases and systems is only possible with separately issued personal usernames and passwords. The controller shall limit the access rights and authorizations to the information systems and other storage media so that the data can be viewed and processed only by persons who are necessary for their lawful processing. In addition, access to databases and systems is logged in the log data of the controller's IT system.

The employees of the controller and other persons have undertaken to observe professional secrecy and to keep confidential the information they receive in connection with the processing of personal data.

## **11. The rights of the data subject**

The data subject has the following rights under the EU General Data Protection Regulation:

1. the right to obtain from the controller confirmation that personal data concerning him or her are being processed or not to be processed and, if such personal data are being processed, the right to have access to the personal data and the following information: (i) the purposes of the processing; (ii) the categories of personal data concerned; (iii) the recipients or groups of recipients to whom the personal data have been or are intended to be disclosed; (iv) where applicable, the intended period for which the personal data will be stored or, if that is not possible, the criteria for determining that period; (v) the right of the data subject to request the controller to rectify or delete personal data concerning him or her or to restrict or object to the processing of personal data concerning him or her; (vi) the right to lodge a complaint with the supervisory authority; (vii) if personal data are not collected from the data subject, all available information on the origin of the data (Article 15 GDPR). This described basic information (i) - (vii) will be provided to the registrant on this form;

2. the right to withdraw consent at any time without prejudice to the lawfulness of the processing carried out prior to the withdrawal (Article 7 of the GDPR);
3. the right to have inaccurate and incorrect personal data concerning the data subject rectified by the controller without undue delay and the right to have incomplete personal data supplemented, inter alia, by providing additional information taking into account the purposes for which the data were processed (Article 16 GDPR);
4. the right to have the controller delete personal data concerning the data subject without undue delay, provided that (i) personal data are no longer needed for the purposes for which they were collected or for which they were otherwise processed; (ii) the data subject withdraws the consent on which the processing is based, and there is no other legal basis for the processing; (iii) the data subject objects to the processing on the basis of his or her specific personal situation and there is no valid reason for the processing or the subject data objects to the processing for direct marketing purposes; (iv) personal data has been processed unlawfully; or (v) personal data must be deleted in order to comply with a legal obligation applicable to the controller under Union law or national law (Article 17 GDPR);
5. the right to have the processing restricted by the controller if (i) the data subject denies the accuracy of the personal data, in which case the processing shall be limited to the period during which the controller can verify their accuracy; (ii) the processing is unlawful, and the data subject opposes the deletion of personal data and instead requests that their use be restricted; (iii) the controller no longer needs such personal data for the purposes of the processing, but the data subject needs them to establish, present or defend a legal claim; or (iv) the data subject has objected to the processing of personal data on the basis of his or her specific personal situation pending verification that the data subject's legitimate grounds override the data subject's grounds (Article 18 GDPR);
6. the right to have access to personal data concerning him or her provided by the data subject to the controller in a structured, commonly used, and machine-readable form and the right to transfer such data to another controller without prejudice to the controller to whom the personal data have been transmitted, provided that the processing is based on the consent referred to in the Regulation and is processed automatically (Article 20 GDPR);
7. the right to lodge a complaint with the supervisory authority if the data subject considers that the processing of personal data concerning him or her violates the general EU data protection regulation (Article 77 GDPR).

Requests for the exercise of the data subject's rights shall be addressed to the controller's contact person referred to in paragraph 1.

## **12. Cookies and other tracking techniques**

Our website uses cookies. By clicking the "I accept cookies" button, you accept the use of cookies. Cookies make using our website easy, fast, and user-friendly.

A cookie is a small text file that is stored on a user's device by an Internet browser. Cookies are set on the user's terminal only with the site invited by the user. Only the server that sent the cookie can later read and use the cookie. Cookies or other technologies do not damage the user's terminal or files and cannot be used to access programs or spread malware. The user cannot be identified by cookies alone.

The uses of cookies are to enhance analytics, marketing, and communication. Cookies are divided into subgroups: functional cookies, product development and business reporting, advertising reporting, and advertising targeting.

There are some third-party tools or plug-ins that are required for the service to function. Examples of such tools include embedding social media or video services on sites or social media sharing and liking capabilities. In addition, such third-party plug-ins may collect information about users of online services, for example, to recommend content or track traffic.

We use cookies to customize the content and ads we provide, to support social media features, and to analyze our traffic. In addition, we share information about how you use our site with our social media, advertising, and analytics partners. Our partners may combine this information with other information you have provided to them or collected after you have used their services.

The services below collect IP information and cookie information:

- Google Analytics, Facebook

### **13 Targeted Marketing**

Based on your visit to the site, we may run targeted advertising on the following services

- Google Ads, Instagram, Facebook

If you wish, you can prevent your browser from using cookies, delete stored cookies, or request a notification of new cookies from your browser. Instructions for deleting cookies can be found at: <https://www.aboutcookies.org/> or <https://preferences-mgr.truste.com/> or <https://optout.aboutads.info/>. Blocking or deleting cookies may interfere with some features of our website.

The services may include third-party advertisements that deliver cookies to your device in order to track the content you use and the advertising you target. A list of third-party marketing platforms is available upon request. Visit the following links: <https://www.networkadvertising.org> or <https://www.youronlinechoices.com/> for more information on how to opt-out of the use of cookies for more relevant advertising.

We reserve the right to update our cookie policies, for example, due to service developments or mandatory legislation.