

DATA PROTECTION DESCRIPTION OF HELTTI'S CUSTOMER AND MARKETING REGISTER

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1 CONTROLLER

Heltti Oy

Business ID: 2544593-8

Mannerheimintie 12 A, 00100 Helsinki

www.heltti.fi

2 CONTACT PERSON FOR REGISTER QUERIES

Data Protection Manager Timo Lappi

Mannerheimintie 12 A, 00100 Helsinki

timo.lappi@heltti.fi

3 NAME OF THE REGISTER

Heltti's Customer and Marketing Register

4 BASIS AND PURPOSE OF PROCESSING THE PERSONAL DATA

The primary grounds for processing personal data is the customer relationship between Heltti and the data subject's employer, Heltti's justified interest (marketing purposes) or the data subject's consent.

Data on Heltti's existing and potential future customers' contact persons will be stored to Heltti's Customer and Marketing Register.

Personal data in Heltti's Customer and Marketing Register may be processed for the following purposes:

Managing, developing, targeting and monitoring marketing, communications and sales activities of Heltti and its co-operation partners.

Analyzing of customer relationships and customer service.

Analyzing, grouping, reporting and other purposes relating to the development of customer relationship and Heltti's business.

Collecting and processing of customer feedback.

Implementation of marketing research and opinion surveys.

Recording customer service centre calls in order to authenticate service events, ensuring and development of legal protection and security, and for training purposes.

Processing tasks can be outsourced to external service providers in accordance with and within the limits set by the data protection legislation.

5 REGISTER'S DATA CONTENT

Information stored on the data subject may include, inter alia, the following:

Name, position, sex, language, telephone number, e-mail address and other necessary contact information of the contact person.

Information on channels for contacting and mailing lists.

Information on offering, purchasing, using and development of services as well as on marketing and sales.

Other information relevant for maintaining and development of customer relationship.

6 STORAGE TIME OF PERSONAL DATA

Heltti will store the personal data in Heltti's Customer and Marketing Register, unless the data subject's employer had terminated its customer relationship with Heltti and/or the data subject has prohibited direct marketing. In such case, the prohibition of direct marketing will be maintained in the register.

7 REGULAR SOURCES OF INFORMATION

Information is received primarily from the following sources:

The data subject herself or himself.

Heltti, Heltti's interest groups and external service providers, such as database service providers and public registers.

Other appropriate sources.

8 REGULAR DISCLOSURE OF DATA AND THE RECIPIENT GROUPS

Data will not be disclosed to parties other than those participating in the production, development, or maintenance of services or communications of Heltti or on its behalf, except when based on an agreement, separate consent, and/or explicit regulations.

9 TRANSFER OF DATA OUTSIDE THE EU OR THE EEA

Personal information can be transferred outside the European union or the European Economic Area, for example, to the United States, in accordance with the data protection legislation and the restrictions set therein.

10 PRINCIPLES IN ACCORDANCE WITH WHICH THE DATA FILE HAS BEEN PROTECTED

A Physical material

The register contains no physical material.

B Electronically processed data

Digital data can only be accessed by employees, practitioners or co-operation partners specifically entitled to do so with a personal user ID and password. There are different levels of access rights, and each user is issued sufficient rights, though as limited as possible, to complete her or his work tasks.

11 THE DATA SUBJECT'S RIGHT TO PROHIBIT DIRECT MARKETING

The data subject may give to Heltti channel-specific consent or prohibitions of direct marketing.

12 OTHER RIGHTS OF THE DATA SUBJECT REGARDING THE PROCESSING OF PERSONAL DATA

12.1 The data subject's right of access to the data

The data subject has the right to inspect what information on him or her has been stored in Heltti's Customer and Marketing Register. Such an inspection request must be made in accordance with Section 13 of this data protection description. The right to inspection may be declined on statutory grounds. As a general rule, there shall be no charge for exercising the right to inspect.

12.2 The data subject's right to demand rectification or erasing of data or a restriction on processing data

If the data subject can act herself or himself, after having been informed of an error in the data or having detected such an error herself or himself, the data subject is required, without undue delay, on her or his own initiative, rectify, erase, or supplement the erroneous, unnecessary, incomplete or obsolete personal data.

To the extent the data subject cannot rectify the data herself or himself, the rectification request is made in accordance with Section 13 of this data protection description.

The data subject also has the right to demand the Heltti to restrict the processing of her or his personal data, for example, in a situation where the data subject is waiting for Heltti's response to her or his request to rectify or erase data.

12.3 The data subject's right to transfer data from one system to another

To the extent the data subject herself or himself has provided information to Heltti's Customer and Marketing Register for processing on the basis of the data subject's consent, the data subject has the right to access such data mainly in machine-readable format and the right to transfer such data to another controller.

12.4 The data subject's right to make a complaint to the supervising authorities

The data subject has the right to make a complaint to the competent supervising authorities, if the controller has not followed the applicable data protection regulations in its operations.

12.5 Other rights

If Heltti processes the personal data on the basis of the data subject's consent, the data subject has the right to cancel the consent by notifying Heltti of this in accordance with Section 13 of this data protection description.

13 CONTACTS

In all matters related to the processing of personal data and all situations regarding the exercising of one's own rights, the data subject should contact Heltti in the MyHeltti Service, by e-mail at privacy@heltti.fi, in person at a Heltti service point, or by post at the address: Heltti Oy / Data Protection, Mannerheimintie 12 A, 00100 Helsinki, Finland. When required, Heltti can request the data subject to further define their request in writing, and, if needed, the identity of the data subject can be authenticated before initiating any other measures.