

DATA PROTECTION DESCRIPTION OF HELTTI'S DIRECT 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

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3 NAME OF THE REGISTER

Heltti's Direct Marketing Register

4 BASIS AND PURPOSE OF PROCESSING THE PERSONAL DATA

The grounds for processing personal data are Heltti's legitimate interest (purpose of direct marketing), customer relationship between the data subject and Heltti or the data subject's consent.

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

Direct marketing, remote marketing, profiling purposes (as described in more detail under Section 11), opinion or marketing surveys or other equivalent addressed deliveries.

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, year of birth, sex, language, address, telephone number, e-mail address and other necessary contact information.

Information on desired channels for contacting, channel-specific direct marketing consent and prohibition data, based on consent or customer relationship.

Other identification data relating to marketing and applicable to the data subject, and the changes in this information.

6 STORAGE TIME OF PERSONAL DATA

Heltti will store the personal data in Heltti's Direct Marketing Register, unless the data subject has prohibited direct marketing. In such case, information on the prohibition of direct marketing will be maintained in the register.

7 REGULAR SOURCES OF INFORMATION

Information is received primarily from the following sources:

Personal data is gathered in connection with marketing campaigns, registering to Heltti's services or otherwise directly from the data subject.

Personal data can also be collected and updated from the other registers of Heltti, the Population Register Centre, prohibition registers maintained by the Finnish Direct Marketing Association or other corresponding registers. No information is collected from Heltti's Patient Register.

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 PROFILING

As part of the processing activities of personal information stored in Heltti's Direct Marketing Register, Heltti can also utilise the information for purposes of profiling. Profiling is implemented by creating a member ID for the data subject for the purpose of combining various data on the data subject created during the use of the service. After this, a profile created as described above can be, inter alia, compared to profiles created on other data subjects.

The purpose of profiling is to enable better targeting of marketing.

12 THE DATA SUBJECT'S RIGHT TO PROHIBIT THE PROCESSING OF PERSONAL DATA

The data subject has the right to prohibit her or his profiling and other processing activities which Heltti may direct on the data subject's personal data to the extent that the grounds for the processing of information is the customer relationship between Heltti and the data subject. The data subject may present his or her demand regarding the prohibition in accordance with Section 15 of this data protection description. In connection with the request, the data subject is required to identify the special situation, on the basis of which she or he objects to the processing of data. Heltti may refuse to implement the request for prohibition on statutory grounds.

13 THE DATA SUBJECT'S RIGHT TO PROHIBIT DIRECT MARKETING

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

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

14.1 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 Direct Marketing Register. Such an inspection request must be made in accordance with Section 15 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.

14.2 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 15 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.

14.3 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 Direct 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.

14.4 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.

14.5 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 15 of this data protection description.

15 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.