

Register Description and Privacy Policy

This is a statement under the EU's General Data Protection Regulation which explains how Desigence Oy processes the personal data of its customers and partners in its operations and what the rights of data subjects are.

Data controller

Desigence Oy
Lemuntie 3-5 B
00510 Helsinki
contact@desigence.com

Contact person in matters concerning the register

Arto Ruokonen
Lemuntie 3-5 B
00510 Helsinki
arto.ruokonen@desigence.com
040 501 7095

Name of register

Desigence Oy's customer register

Purpose and legal basis of processing of personal data

The personal data of customers/partners are processed and maintained on the basis of customer/contractual relationship for the following purposes:

- maintenance and development of customer/contractual relationship
- implementation of customer/partner projects
- sales invoicing and monitoring of receivables
- marketing, sales and communication measures

Personal data of customers/partners are not processed except for the aforementioned purposes. Data are not used for automated decision-making or profiling.

Data content of register

Data to be stored in the customer register are:

- name and contact information of person (telephone number, email address, address)
- position/title of person
- name and contact information of company
- domain names of websites
- commission agreements and confidentiality agreements
- other agreements

- invoicing data
- contact information
- monitoring data of newsletters

Regular sources of data

Data to be stored in the register are obtained from the customer, such as from messages sent by online forms, by email, from agreements, customer meetings and other circumstances in which the customer discloses his or her data, or from public websites.

Retention periods of data

Personal data are kept only for the period of time needed for carrying out the purposes of the data processing. After the time limit, the data are removed entirely or anonymized.

The time limits are:

- the personal data of a customer/partner are kept for the duration of a valid customer relationship/contractual relationship
- agreement, project and invoicing data related to ordered services are retained permanently

Regular disclosures of data

Personal data are disclosed only to parties who are legally authorized to receive the data for a specified purpose. These parties include various authorities in a manner separately provided for by law.

Desigence may use reliable subcontractors or cloud services in the processing of personal data. We have verified that all of our service providers take appropriate security measures and make sure that processing is in compliance with requirements of the General Data Protection Regulation. We regularly use the following service providers.

- Taimer (CRM)
- Basecamp (project management)
- Gylling Accounting (monitoring of receivables)
- Apsis (newsletters)

Transfer of data outside of the EU or EEA

The data of the Basecamp online service to be used in project management are stored on servers of the service provider located in the United States. Basecamp is part of the Privacy Shield system and the company has its own [privacy policy](#).

Principles of protecting the register

Access to personal data, devices and services are limited to those people whose work requires it. Data are processed by people who have committed to maintain confidentiality.

If a service provider is used to process personal data, data protection legislation and otherwise proper processing of personal data is ensured by contractual arrangements.

Employees are provided with operational guidelines and training on processing of personal data. Compliance with the principles of personal data processing is monitored by means of internal auditing.

Desigence maintains a high level of security in internal networks. Server computers to be used for processing data and locked cabinets containing manual material are located in facilities protected by means of access control and security systems.

Data are backed up regularly. The confidentiality, integrity, usability, data access and fault tolerance of processing systems and services are ensured by, among other things, security updates and by regularly auditing the systems.

Rights of data subjects

Data subjects have the following rights; please submit requests to exercise these rights to the address contact@desigence.com.

Right to review

The data subject may review the personal data we retain.

Right to rectify data

Data subjects may request that inaccurate or incomplete information about them be rectified.

Right to object

The data subject may object to the processing of personal data if he or she believes the personal data have been processed unlawfully.

Direct marketing ban

The data subject has the right to prohibit the use of data for direct marketing.

Right to erasure

The data subject has the right to request the removal of data if the processing of data is not necessary. We process the removal request, after which we either remove the data or give a justified reason for why the data cannot be removed.

It should be noted that the data controller may have a legal or other right to not remove the requested data. The data controller has the obligation to retain accounting records according to the period of time (10 years) specified in the Accounting Act (Chapter 2, Section 10). Therefore material related to accounting cannot be removed before the time limit expires.

Withdrawal of consent

If the processing of personal data related to a data subject is based solely on consent, and not on a customer relationship or a membership, for instance, the data subject may withdraw consent.

A data subject may appeal a decision to data protection ombudsman

A data subject has the right to request that we limit the processing of disputed data until it the matter is settled.

Right of appeal

The data subject has the right to submit a complaint to a data protection ombudsman if he or she believes that we are in violation of valid data protection legislation in our processing of personal data.

Contact information of data protection ombudsman: www.tietosuoja.fi/fi/index/yhteystiedot.html