

## 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 potential customers 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 marketing register

### **Purpose and legal basis of processing of personal data**

Personal data of potential customers are processed and maintained on the basis of legitimate interest for the following purposes:

- marketing, sales and communication measures

Personal data of potential customers 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 marketing register are:

- name and contact information of person (telephone number, email address, address)
- position/title of person
- name and contact information of company
- contact information
- monitoring data of newsletters

## **Regular sources of data**

Data to be stored in the register are obtained from the customer, including from chats, messages sent by online forms, through newsletters, by email, by telephone or from outside sources such as commercial providers of registers of companies 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:

- when a person's position and job assignments change so that there is no legitimate interest for marketing (data are reviewed at least every 3 years)
- when a person prohibits direct marketing

## **Regular disclosures of data**

Personal data are not disclosed outside of Desigence Oy for marketing purposes.

Desigence may use reliable 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)
- Apsis (newsletters)

## **Transfer of data outside of the EU or EEA**

Personal data are not transferred outside of the EU/EEA.

## **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](mailto: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](http://www.tietosuoja.fi/fi/index/yhteystiedot.html)