

Customer register – Privacy Statement

Drawn up on	24 April 2021
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Contact person in matters concerning the file	Heli Ahonen Piiskakuja 7, FI-20380 Turku +358 46 851 2316 heli.ahonen@mastermark.fi
Name of file	Customer register
Legal basis and purpose of personal data processing. Whether the provision of data is a statutory or contractual requirement	<p>The file's purpose of use is to maintain the organisation's customer register, to manage, archive and process customers' orders and to manage the customer relationship. The data can be used for developing operations, statistical purposes and for providing more personalised content in our online services. Personal data is processed within the limits permitted and required by the General Data Protection Regulation.</p> <p>The data in the file can be used in the organisation's own registers, for example, for targeting marketing without disclosing personal data to third parties. The organisation may use co-operation partners for maintaining the customer and service relationship, in which case parts of the data in the file may be transferred to the co-operation partner's servers due to technical requirements.</p> <p>Data is processed only for the purpose of maintaining the controller organisation's customer relationship through technical interfaces.</p> <p>The organisation has the right to publish data contained in the customer register as an online or written list, unless expressly prohibited by the customer. In this case, list refers to, for example, mailing labels for direct advertising or similar. The customer has the right to prohibit the publication of the data by notifying the controller thereof through the customer service, by email (email address) or through the contact person for the file.</p>
Basis for legitimate interest	The legal basis for the processing is a contract
Personal data categories involved	Name, represented organisation, contact information, invoicing information
Recipients and recipient groups	The controller's personnel and outsourcing partners (financial administration) as applicable
Consent	The processing is based on a contract.
Data content of file	<p>The personal data register contains the following information:</p> <ul style="list-style-type: none"> - The person's first and last name - The entity the person represents - Email address - Postal address - Telephone number - Website address - IP number - Information on previous orders

<p>Regular sources of data</p>	<p>Data is obtained from registrations by the customer and from notifications by the customer during the customer relationship. Updates of names and contact information are also obtained from authorities and companies that provide updating services.</p> <p>Data can also be obtained from subcontractors related to the use or provision of the service.</p> <p>Information on the customer's other activities in a digital environment can also be obtained from the co-operation partners' websites, information systems or other digital sources to which users log in through an electronic invitation (link), through cookies or by using the credentials given to the customer.</p> <p>The data in the customer register is only accessed by the organisation, except where an external service provider is used to either provide a value added service or support a credit decision.</p> <p>Data is not disclosed to parties outside the organisation or to its co-operation partners, except for matters pertaining to a credit application, collection or invoicing and where required by legislation.</p> <p>Personal data is not transferred outside the European Union unless it is necessary to ensure the technical implementation by the controller or its co-operation partner. The data subjects' personal data is destroyed at the user's request unless legislation, outstanding invoices or collection measures prevent the erasure of the data.</p>
<p>Retention period for personal data</p>	<p>10 years starting at the end of the customer relationship.</p>
<p>Regular disclosure of data</p>	<p>The data in the customer register is only accessed by the organisation, except where an external service provider is used to either provide a value added service or support a credit decision.</p> <p>Data is not disclosed to parties outside the controller or to its co-operation partners, except for matters pertaining to a credit application, collection or invoicing and where required by legislation.</p> <p>The data subjects' personal data is destroyed at the user's request unless legislation, outstanding invoices or collection measures prevent the erasure of the data.</p>
<p>Transfer of data outside the EU or EEA</p>	<p>Personal data is not transferred outside the European Union unless it is necessary to ensure the technical implementation by the organisation or its co-operation partner.</p>
<p>File protection principles A: Manual materials</p>	<p>Contact information collected at customer events and other documents that contain customer data and are processed manually are kept in locked and fire-safe storage spaces after initial processing.</p> <p>Only designated employees who have signed a non-disclosure agreement have the right to process manually saved customer data.</p> <p>The provisions and principles laid down in the Finnish Data Protection Act, authorities' regulations and good data processing practices are complied with in protecting the data in the file.</p>
<p>File protection principles B: Activities processed using automatic data processing</p>	<p>Only designated employees of the organisation and the companies acting on its behalf have the right to access the customer owner and customer register and maintain its data. Each designated user has a personal user ID and password.</p> <p>Each user has signed a non-disclosure agreement. The system is protected by a firewall that protects it from intrusions.</p> <p>The provisions and principles laid down in the Finnish Data Protection Act, authorities' regulations and good data processing practices are complied with in protecting the data in the file.</p>

<p>Cookies</p>	<p>We use cookies on our website. A cookie is a small text file that is sent to the user's computer and stored there. Cookies do not harm users' computers or files. The primary purpose of using cookies is to improve and adapt the visitor's user experience on the website and to analyse and improve the website's functionality and content.</p> <p>The data collected with the help of cookies can also be used in targeting communications and marketing and in optimising marketing measures. Visitors cannot be identified based on cookies only. However, data obtained through cookies can be associated with other data possibly obtained from the user in another context, for example when the user fills in a form on our website.</p> <p>Cookies are used to collect the following data:</p> <ul style="list-style-type: none"> - visitor's IP address - time of the visit - browsed pages and browsing times - visitor's browser <p>Your rights</p> <p>Users visiting our website have the opportunity to block the use of cookies anytime by changing their browser settings. Most browsers allow disabling cookies and removing cookies that have already been saved.</p> <p>Disabling cookies may affect the website's functionality. GOOGLE ANALYTICS Usage statistics data is collected from the website for the Google Analytics service for tracking the website traffic, developing the website and planning marketing. Individual users or persons cannot be identified based on the collected data.</p> <p>In addition, the website uses Google Analytics Demographics to collect data on users' age and gender and topics of interest, among other things. You can change the settings related to the collection of this data in your Google account at https://www.google.com/settings/ads.</p> <p>If you wish, you can disable the Google Analytics tracking with the Chrome opt-out browser add-on.</p>
<p>Automatic processing and profiling</p>	
<p>Right of access to personal data.</p>	<p>The data subjects have the right to know what information concerning them is stored in the file. The access request must be made in writing by contacting the controller's customer service or the file's contact person in Finnish or English. The access request must be signed.</p> <p>The data subjects have the right to prohibit the processing and disclosure of their personal data for purposes of direct advertising, distance selling and direct marketing, as well as for market research and opinion polls, by contacting the controller's customer service point.</p>
<p>Right to data portability from one system to another</p>	<p>The data subjects have the right to transfer their data from one system to another. The transfer request can be addressed to the file's contact person.</p>
<p>Right to rectification</p>	<p>Any personal data contained in the file that is unnecessary for the purpose of processing, erroneous, incomplete or obsolete must be rectified, erased or completed.</p> <p>The rectification request must be made by addressing a written request, signed by the data subject personally, to the organisation's customer service or the party maintaining the personal register.</p> <p>The request must specify what data is requested to be rectified and on what grounds. The rectification shall be carried out without delay.</p>

	<p>Notification of rectification shall be sent to the party who provided the inaccurate data or to whom the data was disclosed.</p> <p>If the rectification request is rejected, the person responsible for the file will issue a written certificate detailing the grounds for the rejection.</p> <p>The concerned party can request that the rejection be resolved by the Data Protection Ombudsman.</p>
Right to restrict	<p>The data subjects have the right to request the restriction of the processing of their data if, for example, the personal data in the file is inaccurate. For this, the person responsible for the file should be contacted.</p>
Right to object	<p>The data subject has the right to obtain the personal data concerning him or her and the right to request the rectification or erasure of his or her personal data. The requests can be addressed to the file's contact person.</p> <p>If you act as the company's or organisation's contact person, your data cannot be erased during that time.</p>
Right to file an appeal with the supervisory authority	<p>If you consider that the processing of your personal data is in breach of the General Data Protection Regulation, you have the right to file a complaint with the supervisory authority.</p> <p>You can also file the complaint in the member state in which you have a permanent residence or workplace.</p> <p>Contact information of the national supervisory authority: Office of the Data Protection Ombudsman P.O. Box 800, Ratapihantie 9, 00521 Helsinki, Finland Tel. +358 29 56 66700 tietosuoja@om.fi www.tietosuoja.fi</p>
Other rights related to personal data processing	<p>The data subject has the right to prohibit the disclosure and processing of his or her personal data for direct advertising and other marketing, demand the anonymisation of his or her data as applicable and the right to be forgotten.</p>