## Customer register - privacy policy

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Contact person in matters concerning the register	Tiina Jyllilä Teollisuuskatu 8 +358 500 565 003 tiina.jyllila@relicomp.fi
Name of register	Customer register
Legal basis and purpose of processing personal data. Is the provision of data a legal or contractual requirement?	The purpose of the register is to maintain the organisation's customer register, to manage customer orders, to perform archiving and processing, and to manage customer relationships. Data can be used to develop operations, for statistical purposes, and to produce more-personal targeted content for our online services. Personal data is processed within the limits permitted and required by the GDPR.
	Data in the register can be used in the organisation's own registers, for purposes such as the targeting of advertising, without disclosing personal data to third parties. The organisation may use partners to maintain customer and employment relationships, in which case some register data may be transferred to the partner's servers due to technical requirements.
	Data is processed solely for the purpose of maintaining the customer relationship managed by the controller organisation via technical interfaces. The organisation has the right to publish data contained in the customer register as an electronic or printed list, unless specifically prohibited from doing so by the customer. In such a case, 'list' may refer to e.g. the following: mailing labels for direct advertisements or similar. The customer has the right to prohibit the publication of data by notifying the controller's customer service thereof by email (email address), or by contacting the register contact person.
	The legal basis for processing is a contract
Basis of legitimate interest	The legal basis for processing is a contract
Categories of personal data concerned	Name, represented organisation, contact information, invoicing information
Recipients and groups of recipients	Controller's personnel and outsourcing partners, where applicable
Consent	
Data content of register	The personal register contains the following data: - Person's first and last name - The organisation which the person represents - Email address - Postal address - Telephone number - WWW address - IP address

	- Data on previous orders
Regular data sources	Data is obtained from registrations made by the customer, and notifications made by the customer during the customer relationship. Updates to name and contact information are also obtained from authorities and companies that provide update services.
	Data may also be obtained from subcontractors involved in the use or
	provision of the service. Data on customers' other activities in the digital environment may be obtained from partners' websites, information systems or other digital sources, to which customers sign in via an electronic invitation (link), via cookies or by using the IDs provided to customers.
	Data on the customer register is available only to the organisation, except when an external service provider is used to provide a value added service, or to assist in making a decision on whether to grant credit.
	Data is not disclosed outside the organisation or for the use of partners, except in matters related to credit applications, debt collection or invoicing, and when required by law. Personal data is not transferred outside the European Union unless this is necessary to ensuring a technical implementation by the controller or its partner. The data subject's personal data will be destroyed at the user's request, unless legislation, unpaid invoices or debt collection procedures prevent the erasure of such data.
Retention period of personal data	10 years from the end of the customer relationship.
Regular disclosures of data	Data on the customer register is available only to the organisation, except when an external service provider is used to provide a value added service, or to assist in making a decision on whether to grant credit.
	Data is not disclosed outside the controller's organisation or for the use of partners, except in matters related to credit applications, debt collection or invoicing, and when required by law. The data subject's personal data will be destroyed at the user's request, unless legislation, unpaid invoices or debt collection procedures prevent the erasure of such data.
Transfer of data outside the EU or EEA	Personal data is not transferred outside the European Union unless this is necessary to ensure a technical implementation by the organisation or its partner.
Principles of register security, A: Manual material	Contact information collected at customer events and other documents containing manually processed customer data are stored in locked and fireproof storage facilities after initial processing.
	Only certain employees, who have signed a non-disclosure agreement, have the right to process manually stored customer data.
	The protection and processing of data in the register complies with the provisions and principles of the Data Protection Act, regulations issued by the authorities, and good data processing practices.
Principles of register security, B: Functions to be processed using IT	Only designated employees of the organisation and of the companies acting on its behalf have the right to use and maintain the customer-owner and customer register. Each designated user has a personal username and password.
	Each user has signed a non-disclosure agreement. The system is protected by a firewall, which protects external contacts made to the system.
	The protection and processing of data in the register complies with the provisions and principles of the Data Protection Act, regulations issued by the authorities, and good data processing practices.

Cookies	We use cookies on our website. A cookie is a small text file sent to and stored on the user's computer. Cookies do not harm users' computers or files. The primary purpose o using cookies is to improve and adapt the visitor's user experience on the site, and to analyse and improve the functionality and content of the website.
	Data collected through cookies can also be used to target communications and marketing, and optimise marketing activities. A website visitor cannot be identified solel on the basis of cookies. However, data obtained through cookies may be connected to data obtained from the user in another context, for example when the user fills out a form on our website.
	Cookies are used to collect the following types of data:
	<ul> <li>visitor's IP address</li> <li>date and time of visit</li> <li>browsed pages and page viewing times</li> <li>visitor's browser</li> </ul>
	Your rights A user visiting our website has the option to block the use of cookies at any time, by changing their browser settings. Most browsers allow the user to turn off the cookie function and delete cookies that have already been saved.
	Blocking cookies may affect the functioning of the website. GOOGLE ANALYTICS The website collects usage statics for Google Analytics for the purpose of monitoring and developing the website, and for the planning of marketing activities. The data collected cannot be linked to an individual user or person.
	In addition, the website uses Google Analytics Demographics, which stores the user's age, gender and topics of interest. You can change the settings related to the collection of such data from your Google Account at https://www.google.com/settings/ads
	You can use the Chrome browser Opt-out Add-on to disable Google Analytics tracking.
Automated processing and profiling	
Right of inspection, i.e. right of access to personal data.	The data subject has the right to check what data the register holds concerning the data subject. An inspection request must be made in writing by contacting the controller's customer service or the contact person of the register, in either Finnish or English. The inspection request must be signed. The data subject has the right to prohibit the processing and disclosure of their data for direct advertising, distance selling and direct marketing purposes, as well as market surveys and opinion polls, by contacting the controller's customer service point.
Right to have data transferred from one system to another	The data subject has the right to have their own data transferred from one system to another. A transfer request can be addressed to the register's contact person.
Right to demand rectification of data	Personal data in the register that is incorrect, unnecessary, incomplete or outdated with regard to the purpose of processing must be rectified, deleted or supplemented.

	<ul> <li>A request for rectification must be made by means of a written request signed by the data subject and submitted to the customer service of the organisation, or to the administrator of the personal data register.</li> <li>Such a request must specify the data to be rectified and on what basis. Data must be rectified without delay.</li> <li>The person from whom the incorrect data was obtained, or to whom it was disclosed, must be notified of the error's rectification.</li> <li>The person responsible for the register must issue a written certificate concerning any refusal to rectify data, citing the reasons for refusing the request.</li> <li>The person concerned may refer a refused request to the Data</li> </ul>
Right of restriction	The data subject has the right to request restrictions on data processing, e.g. if the personal data in the register is incorrect. Please contact the person in charge of the register.
Right to object	<ul><li>The data subject has the right to object to the processing of personal data concerning them, and to request the rectification or erasure of personal data. Such a request can be addressed to the register's contact person.</li><li>If you act as a contact person for your company or organisation, your data cannot be deleted during your time as the contact person.</li></ul>
Right to lodge a complaint with the supervisory authority	<ul> <li>If you consider that the processing of personal data concerning you has violated the General Data Protection Regulation, you have the right to lodge a complaint with the supervisory authority.</li> <li>You can also lodge a complaint in a Member State where you have a permanent place of residence or job.</li> <li>The contact details of the national supervisory authority are: Office of the Data Protection Ombudsman P.O. Box 800, Ratapihantie 9, 00521 Helsinki Tel. +358 (0)29 56 66700 tietosuoja@om.fi www.tietosuoja.fi</li> </ul>
Other rights related to the processing of personal data	The data subject has the right to prohibit the disclosure and processing of their data for direct advertising and other marketing purposes; to require anonymisation of the data, where applicable; and to be completely forgotten.