

Electronic communications register

Privacy Notice

Controller

LINK Design and Development Oy (Business ID 2251285-9)
Tekniikantie 12, Innopoli 1
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Contact person for matters concerning the register

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Register

Electronic communications register

Date of preparation

17 November 2020

Legal basis for processing

Consent

Purpose of the processing of personal data

The purpose of the register is to enable the controller to communicate by email.

The data obtained (the email address as well as any contact details or other personal data contained in the messages themselves and in their attachments) is used to establish and maintain customer relationships and for the controller's other communication needs.

The basis for processing is legitimate interest.

Basis for legitimate interest

Communication with the organization's customers, stakeholders and potential customers, marketing and sales.

The controller's legitimate interest in processing the personal data collected and used is based on direct marketing needs and the freedom to conduct a business.

Direct marketing constitutes a legitimate interest of the controller under the EU General Data Protection Regulation.

Recipients and categories of recipients

The controller's personnel and outsourcing partners where applicable (financial administration, IT administration, etc.), as well as the parties to the communications.

Data content of the register

The personal data register contains the following data:

- The person's first name and surname
- The organization represented
- The person's role in the organization represented
- Email address
- Postal address
- Telephone number
- Information on previous orders
- Records of discussions between the communicating parties
- Other personal data contained in any attachments

Regular sources of data

Data is obtained from email messages received from the customer.

Data may be obtained from other stakeholders, for example through mass communications, messaging groups, forwarded messages or similar communication situations.

Data will not be disclosed outside the organization maintaining the register or for the use of its partners, except in matters relating to credit applications, debt collection or invoicing, and where required by law. Personal data will not be transferred outside the European Union unless this is necessary to ensure the technical implementation of the controller's or its partner's services.

A data subject's personal data will be destroyed at the data subject's request, unless legislation, the management of the customer relationship, outstanding invoices or debt collection measures prevent the erasure of the data.

Retention period of personal data

Data is retained for 10 years.

Regular disclosures of data

The data on the email list is used solely by the controller, except when an external service provider is used either to produce a value-added service or to support a credit decision.

Data will not be disclosed outside the controller or for the use of its partners, except in matters relating to credit applications, debt collection or invoicing, and where required by law.

A data subject's personal data will be destroyed at the data subject's request, unless legislation, the management of the customer relationship, outstanding invoices or debt collection measures prevent the erasure of the data.

Transfers of data outside the EU or EEA

Personal data will not be transferred outside the European Union unless this is necessary to ensure the technical implementation of the controller's or its partner's services.

Principles of register security A: Manual material

Documents containing customer data that are processed manually (e.g. printed emails or their attachments) are stored, after initial processing, in locked and fireproof storage facilities. Only designated employees who have signed a confidentiality undertaking are authorized to process manually stored customer data.

Principles of register security B: Electronic material

Only designated employees of the organization and of companies acting on its behalf are authorized to use email and to maintain its data. Each designated user has a personal user ID and password. Every user has signed a confidentiality undertaking.

The system is protected by a firewall, which protects the system against connections from outside.

Access to any multifunction devices, such as scanners, and to the data stored on them is restricted where applicable.

Cookies

We use cookies on our website. A cookie is a small text file that is sent to and stored on the user's computer. Cookies do not damage users' computers or files. The primary purpose of using cookies is to improve and personalize the visitor's experience on the website and to analyze and improve the functionality and content of the website.

Information collected by means of cookies may also be used to target communications and marketing and to optimize marketing measures. A visitor cannot be identified by means of cookies alone. Information obtained through cookies may, however, be combined with information that the user may have provided in another context, for example when completing a form on our website.

The following information is collected by means of cookies:

- the visitor's IP address
- the time of the visit
- the pages viewed and the time spent on each page
- the visitor's browser

Your rights

A user visiting our website may at any time prevent the use of cookies by changing their browser settings. Most browsers allow the cookie function to be disabled and cookies that have already been stored to be deleted.

Blocking the use of cookies may affect the functionality of the website.

GOOGLE ANALYTICS

Usage statistics are collected from the website into the Google Analytics service for the purpose of monitoring and developing the website and planning marketing. The data collected cannot be used to identify an individual user or person.

In addition, the website uses the collection of audience and interest data (Google Analytics Demographics), which records information about the user such as age, gender and areas of interest. You can change the settings relating to the collection of this data in your own Google account at <https://www.google.com/settings/ads>

If you wish, you can opt out of Google Analytics tracking, for example by using a browser add-on for Chrome.

Right of access to personal data

The data subject has the right to check what data concerning them is held in the register. A request for access must be made in writing by contacting the controller's customer service or the contact person for the register, in Finnish or in English. The request for access must be signed.

The data subject has the right to prohibit the processing and disclosure of their data for the purposes of direct advertising, distance selling and direct marketing, as well as market research and opinion polls, by contacting the controller's customer service point.

Right to data portability

The data subject has the right to transfer their own data from one system to another.

A request for data portability may be addressed to the contact person for the register.

Right to rectification

Any personal data in the register that is inaccurate, unnecessary, incomplete or outdated for the purposes of the processing must be rectified, erased or completed.

A request for rectification must be submitted in writing, personally signed by the data subject, to the customer service of the organization maintaining the register or to the administrator of the personal data register.

The request must specify which data is to be rectified and on what grounds. Rectification will be carried out without undue delay.

The rectification of an error will be notified to the party from whom the inaccurate data was obtained or to whom the data has been disclosed. If a request for rectification is refused, the person responsible for the register will issue a written certificate stating the reasons for the

refusal. The person concerned may refer the refusal to the Data Protection Ombudsman for a decision.

Right to restriction of processing

The data subject has the right to request that the processing of their data be restricted, for example if the personal data held in the register is inaccurate. Requests should be addressed to the person responsible for the register.

Right to object

The data subject has the right to request access to the personal data concerning them, and the data subject has the right to request the rectification or erasure of their personal data. Requests may be addressed to the contact person for the register.

If you act as the contact person for a company or organization, your data cannot be erased during this period.

Right to lodge a complaint with a supervisory authority

If you consider that the processing of personal data concerning you infringes the General Data Protection Regulation, you have the right to lodge a complaint with a supervisory authority.

You may also lodge the complaint in the Member State of your habitual residence or place of work.

The contact details of the national supervisory authority are:

Office of the Data Protection Ombudsman

P.O. Box 800, FI-00531 Helsinki (visiting address: Lintulahdenkuja 4, 00530 Helsinki)

Tel. +358 29 566 6700

tietosuoja@om.fi

www.tietosuoja.fi

Other rights relating to the processing of personal data

The data subject has the right to prohibit the disclosure and processing of their data for the purposes of direct advertising and other marketing, to request the anonymization of their data where applicable, and the right to be forgotten.