

# Privacy Policy

Customer and partner register

This is a Privacy Statement that fulfills the information obligation for registered customers and partners under Article 13 of the Data Protection Regulation (General Data Protection Regulation (EU) 2016/679).

## 1. Data controller

KPY Novapolis Oy  
Business ID: 2682876-2  
Address: Viestikatu 7, 70600 Kuopio

## 2. Data Protection Officer

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## 3. Register name

Customer and partner register.

## 4. Legal basis and purpose of the processing of personal data

The processing of personal data shall be based on the implementation of the rights and obligations arising from the lease and / or service agreement between the controller and its customer or the supplier agreement or communication between the controller and the third party, and the implementation of pre-contractual measures.

The purposes of personal data include managing, maintaining, developing, analyzing, maintaining customer relationships between the data controller and the customer (including potential customers), customer communications, organizing events, taking customer experience measurements, identifying customer users and managing partnerships. In addition, personal data is used to target the registrar's (including electronic newsletters) online advertising, to develop and design the registrar's products and services.

## 5. Data content of the register and groups of data subjects

The decision-makers and contact persons of the registrar's current and potential customers, suppliers and partners, subscribers to newsletters and senders of maintenance or contact requests are entered in the register of customers and partners.

The register contains the following personal data:

- first name
- last name

- position in the organization (title)
- language of business
- company
- business address
- email address
- telephone number
- username and password for any electronic services
- contact information (eg e-mails and electronic transaction forms) information related to marketing and promotion (eg targeted information)
- marketing activities, participation in events)
- information about the use of electronic services (for example, browsing and search information, IP addresses and cookies)
- consents and prohibitions on direct marketing
- any other information provided by the data subject himself

## **6. Regular sources of information**

Information about the data subject is regularly obtained and collected from customers (including potential customers) and partners themselves by telephone, e-mail, online, in meetings, during the conclusion of the contract and during the contractual relationship.

Personal information may also be collected and updated from public and private registries, such as the population register, other authorities, credit information companies, contact service providers and other similar trusted parties.

## **7. Regular disclosures**

The data is not regularly disclosed to parties outside the register. The controller will use external subcontractors to carry out the tasks described in this report, in which case the service providers will act on behalf of the controller. Subcontractors, ie groups of recipients of personal data, include, for example, marketing and communications agencies, event organizers, information system suppliers and partners providing real estate and business premises services. In addition, the controller may disclose the contact details of data subjects to its subcontractors for the marketing of its services.

We may disclose personal information to third parties in the following cases:

- 1) When required by law.
- 2) To the Service Provider for the technical implementation and development of the Service.
- 3) Personal data may also be disclosed to the Service Provider's partners who provide products, services or other benefits through the Service (such as the delivery of a product to a registrant). If the registrant participates in the competitions through the Service, the contact information may be provided to the partner for delivery and contact.
- 4) When we believe in good faith that the disclosure is necessary to safeguard our rights, the data subject and others, to investigate fraud or to respond to requests from authorities.

## **8. Data transfer outside the EU or the EEA**

The controller seeks to implement the services and process personal data only with the benefit of operators and services located in the EU or EEA. Activities and services may

however, in some individual cases it may be necessary to use operators located elsewhere, services and servers.

The controller will not transfer or transfer personal data outside the European Union or the EEA without legal grounds. Some third-party service or software providers may store information outside the EU or the European Economic Area. In that case, the controller shall apply the necessary contractual safeguards for the transfer of personal data to such service providers.

## **9. Storage of data**

Personal data will be kept for as long as is necessary for the purpose for which the personal data are used. However, the data controller always has the right to store personal data or otherwise process them in situations permitted by the legislation in force at the time (such as the retention periods to be complied with under the Accounting and Advance Collection Act). The personal data of decision-makers will be stored permanently for direct marketing purposes within the limits permitted by law.

Information relating to a customer or partnership relationship is, in principle, retained for the duration of the customer relationship or partnership or for the duration of the employment relationship of the customer or partner's personnel representative (whichever is earlier). The data shall be deleted within a reasonable time after the end of the contractual relationship, unless otherwise required by the controller's legal obligations (such as accounting) or contractual obligations.

The controller shall regularly assess the need for the retention of personal data and shall take reasonable steps to ensure that personal data which are incompatible, out of date or inaccurate with regard to the purposes for which they are processed are not retained in the register.

## **10. Data Security**

Personal data is protected by the Service Provider from unauthorized access to the data and from accidental or illegal processing by adequate technical and organizational measures. Electronic data is protected by a firewall, usernames and passwords. Access to the data is restricted to those persons employed by the controller who need the data in the course of their duties.

## **11. Rights of the data subject**

Rekisteröidyllä on oikeus:

- access the personal data and learn what information is stored, for what purpose, to whom the data is possibly disclosed, and for how long it is stored;
- request that his or her personal data be corrected, complemented or deleted;
- limit the processing of his/her personal data;
- object to the processing of his/her personal data;
- request that the personal data provided for the data files be returned for transfer to another controller; and
- prohibit the use of his/her personal data for direct marketing purposes and certain other situations specified in the EU Data Protection Regulation.

Data subjects may send their requests related to the exercise of their rights in writing to the controller of the data file to the address indicated above. Please note that the data controller is required, in certain cases, to ask for additional information necessary to verify the identity of the data subject submitting the request.

If a data subject requests access to his/her personal data, the controller will provide copy of the data stored in the data file in a hardcopy or electronic format or indicate a site on which the stored data is available without undue delay and no later than within one month of the submission of the request. If necessary because of the complexity or number of requests, the controller may extend the time limit up to two months provided that the data subject is duly informed of such extension.

If a data subject considers that his/her legal rights have been infringed, they have the right to lodge a complaint with a national data protection authority or other data protection authority in the European Union or the European Economic Area.

Processing of personal data is overseen and supervised and related advice provided by the Data Protection Ombudsman. Contact details: Office of the Data Protection Ombudsman, PL 800, 00521 Helsinki, Finland.

## **12. Amendments**

The data controller has the right to update the privacy statement at any time by publishing the updated version on the Novapolis website. Up-to-date information can always be found on this particular website. When we update, we will also change the date of the privacy statement at the top of the page. The new modified or revised Privacy Statement will take effect from the date of the update. We encourage you to register regularly for the privacy statement.