



KAINUUN ETU

Privacy Policy: Customer Registry

EU's General Data Privacy Regulation (679/2016)
Personal Data Act (523/1999) 10§ ja 24§

Updated 28.05.2019

1. Registry keeper

Kainuun Etu Ltd.
Business ID: 0784050-4

Seminaarinkatu 2, Intelli-building, PL 10
FI-87100 Kajaani, Finland

2. Contact person for registry related matters

Kati Moilanen
Management's secretary
+358 44 551 4602
kati.moilanen@kainuunetu.fi

3. Registry name

Kainuun Etu Ltd.'s customer registry

4. Purpose and legal justification of processing the personal data

Personal data is processed in order to handle the customer and other appropriate relations as well as to develop and plan operations of Kainuun Etu Ltd. and of the projects that Kainuun Etu Ltd. administrates. Personal data is also processed for customer communications purposes that can be done also electronically and by the means of targeting.



5. Registry contents

The registry may contain the following information

- Organisation
- Business ID
- VAT-identifier
- Post address
- Billing address
- Domain identifier
- Social Media accounts
- Sector
- Turnover
- Personnel amount
- Amount of the De Minimis -support
- Country
- Contact person
- Job title
- Email address
- Phone number
- Allergies

6. Regular data sources

The data is received when the customer joins the customer relationship as well as from the services that the customer orders during the customer relationship. In addition, personnel data can be collected either orally or literally during contact.

Personal data can be collected and updated from Kainuun Etu Ltd. or from the projects, that Kainuun Etu Ltd. administrates, cooperation partners registries as well as from companies that offer services related to personal data.

Personal data can also be collected through websites with their consent.

7. Disclosure to third parties

Personal data can be disclosed to the cooperation partners of Kainuun Etu Ltd. or of the projects that Kainuun Etu Ltd. administrates within the legal regulations.

In addition, the data can be disclosed to officials in legal cases.



8. Transfer of data outside of European Union or European Economic Area

Data is not transferred outside of EU or EEC.

9. Registry's protection principles

Personal data is stored as confidential. Only employees who have signed a non-disclosure agreement have access to personal data.

Electronic data

Network and hardware that contains the registry is protected with firewalls, passwords as well as with other approved technical measures.

Manual material

Documents containing personal data are kept in the business premises, in locked cabinet, to which the entry has been blocked from outsiders.

10. Preservation of personal data

The data collected to the registry will be stored as long and in the extent that is necessary related to the original or compatible purposes, for which the data was collected. The legal justification and the processing needs will be evaluated at least every five (5) years.

The registry keeper evaluates the preservation need according to its practice regulations. In addition, the registry keeper will implement all reasonable actions to ensure that all misinformation is corrected, and old personal data will be deleted.

11. Rights of the registered person

Requests to implement the rights of the registered person will be directed to the contact person mentioned in this document.

The right to check the data and correct it

The registered person has a right to receive confirmation if data related to him is processed, and if so, the person has a right to receive a copy of the personal data.



The registered person has a right to demand Kainuun Etu Ltd. to correct the person's inaccurate or incorrect information, as well as to fill in the missing information without unnecessary delays.

Right to delete the data

The registered person has a right to demand the deletion of the data without unnecessary delays, presuming that:

Rekisteröidyllä on oikeus tietojen poistamiseen ilman aiheetonta viivästystä edellyttäen että:

- The personal data is no longer needed for the purposes that they were collected/processed for;
- Registered person cancel his consent, to which the processing has been based, and there is no other legal justification;
- The personal data has been processed against the law.

Right to restrict processing and the right to contest

The registered person has a right to demand that the registry keeper restricts the data processing if:

- Registered person denies the accuracy of the personal data
- Processing is against the law and registered person contests the deletion of data
- The registry keeper no longer requires personal data in question for the processing purposes
- Registered person has contested the processing of personal data by invoking the 21st article's section 1.

The registered person has a right to contest the processing of his/her personal data at any time.

Right to cancel consent

Registered person has a right to cancel the consent that they have given for the data processing without affecting the legality of the processing that happened before the person cancelled the consent.

Right to transfer data from one system to another

The registered person has a right to receive the personal data in organised, commonly used and mechanically readable form, and the right to transfer the personal data in question to another registry keeper.



KAINUUN ETU

Right to appeal to the supervising authority

The registered person has a right to appeal to the supervising authority, if the person sees that the data privacy regulation is being broken during the processing of the personal data.

12. Additional information

For further information, the registered person can contact the contact person mentioned in section 2, if the person so wishes.