



**KAINUUN ETU**

# Privacy Policy: Marketing Registry

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

Updated 28.05.2019

## 1. Keeper of the Registry

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. Name of the Registry

Kainuun Etu Ltd.'s marketing registry

## 4. Purpose and the Legal Justification of Processing the Personal Data

Personal data is processed for the direct marketing of Kainuun Etu Ltd.'s and the project's, that Kainuun Etu Ltd. administrates, services and events as well as for opinion and market research, development and planning of operations. Personal data is also processed for customer communications purposes that can be done also electronically and by the means of targeting.

Personal data is processed based on the consent or a possible assignment given by the registered.



## 5. Contents of the Registry

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. Sources of the Data

Personal data is collected either orally or literally during contact. During events, seminars, trainings, trade-fairs and other similar events organised by Kainuun Etu Ltd. or the project's Kainuun Et Ltd. administrates, participant information is collected.

Personal data can be collected and updated from Kainuun Etu Ltd.'s or from the project's, that Kainuun Etu Ltd. administrates, cooperation partner's 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 project's 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 the European Union or the European Economic Area

Data is not transferred outside the European Union or the European Economic Area.



## **9. Protection Principles of the Registry**

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 Time of the 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**

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

### **Right to Check the Data and Correct It**

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

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



## **Right to Delete the Data**

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

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

## **Right to Restrict Processing and Right to Contest**

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

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

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

## **Right to Cancel the Consent**

Registered has a right to cancel the consent that he/she has given for the data processing without affecting the legality of the processing that happened before he/she cancelled the consent.

## **Right to Transfer Data from One System to Another**

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

## **Right to Appeal to the Supervising Authority**

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

## **12. Additional information**

For further information, the registered can contact the contact person mentioned in section 2 of this document, if he/she so wishes.