



## DATA PROTECTION POLICY

### Registry controller

Company: Sointu Group Oy  
Company ID: 2808119-9  
Address: Puronsuuntie 5 a  
Postcode: 80910  
Post Town : Kulho

### Person responsible for registry matters

Name: Juha-Pekka Hirvonen  
Tel. number: +358 5044 22154  
Email: jp@sointu.com

### Processing of your personal data

We collect and process your personal data to be able to conduct business and to provide the services you have ordered, to target marketing and to otherwise serve you. The personal data we collect may be used for managing customer relationships, for keeping statistics on the usage of our services, for enhancing and researching the user experience and for other re-search with the aim of improving our website or services. We may also analyse customer feedback. The personal data may also be used for customer relationship communications and for managing marketing and contacts. We may also use the data for the purposes of conversion tracking and targeted marketing.

We process your personal data according to the requirements of the GDPR. Personal information is collected, processed and used with the customer's consent for the purpose of managing, dealing with, maintaining, communicating and marketing customer relationships with Sointu Group Oy. Personal information is also used to identify the customer and manage access. In addition, the data can be used for statistical and service development purposes.

### Personal data we collect and our sources of data

Information is collected for customer relationship purposes. The Customer Data is collected and processed with the Customer's consent, or for the purpose of implementing a contract with the Customer. Personal data will be processed to the extent permitted and required by the Personal Data Act and the Privacy Act. Personal data will be retained for as long as is necessary to implement a contract with the customer or to improve customer service.



We may collect the following information:

- Personal information such as name, address, telephone number, email address
- Business ID or VAT code, name of organization, and contact person if the order is from a company, association or other organization
- Usernames and passwords associated with the service
- The IP address from which the services are accessed
- Information required to provide the Services, such as billing and payment information, credentials, authorizations, contacts and other communications, emails, call records, chat conversations
- Marketing consent information, newsletter sign-up and similar subscription information
- Cookies
- Other mandatory information related to the provision of the service

In addition, we collect information from you in connection with your use of the Services. This could be, for example:

- Order and Invoice History
- Information related to the maintenance of the Services
- Tracking information related to marketing and page navigation
- Customer analysis information
- Other information generated during the use of the service

In addition, we may also collect other information that we have obtained from you upon your consent.

For example, you can be our source of information when, for example, you do business with us when you order and use our services, you do business with us on our website, you contact us, or you subscribe to newsletters, for example. We also collect information by observing the use of the service. Sources of information may include, but are not limited to, email, contact form, customer service chat, or log information.

Our external sources of information may also include, for example, publicly accessible registers, purchased marketing registers or the like, as well as various services such as Facebook, LinkedIn, Instagram, Twitter, Google Analytics, Google Ads, Google AdSense and LinkedIn.

We may also use information derived from the information we collect, such as inferences that may relate, for example, to potential interests.

### **Retention period of data**

Personal data will be retained for as long as is necessary to implement a contract with the customer or to improve customer service.



### **Regular disclosures and transfers of information outside the EU or the EEA**

Information may be disclosed, at the controller's discretion, to our partners, to the extent permitted by and in accordance with applicable law, unless the data subject has opted out the extradition. Disclosure of information to partners is only for purposes that support the registry's mission statement.

Names and addresses will not be disclosed from the customer register for direct marketing purposes. In addition, the information will not be disclosed outside the EU or the European Economic Area for any purpose.

### **Registry protection**

The data is transferred over an SSL secure connection.

Electronic information is protected by a firewall, usernames and passwords. Manual material is generated, for example, in the form of a completed lottery ticket or an offer request form. After storing the data in an electronic database, manual material is destroyed with a shredder.

Only those persons employed by the controller who need the information in the course of their duties shall have access to the information.

### **Rights of the data subject**

The data subject shall have the right to verify what information concerning him or her has been entered in the personal data register. A written request for verification must be sent and signed to the person responsible for registry matters. The right of inspection shall be free of charge once a year.

The data subject has the right to request the correction or deletion of incorrect or outdated data or the transfer of data from one system to another. He also has the right to restrict or object to the processing of his data in accordance with Articles 18 and 21 of the EU Data Protection Regulation. The data subject has the right to complain to the supervisory authority if he/she feels that the processing of personal data is contrary to the GDPR.

### **Use of cookies**

A cookie is a short text file sent by a server to an incoming user's browser. The cookie in question is stored on the user's hard disk. Cookies are used to ensure the functionality of the service, such as logging on to the site. In addition, cookies are used to track marketing, generate traffic statistics, research, monitor, and improve UI usage. Cookies also ensure the safe use of the service and user-friendliness. Cookies may also be used in third party services such as visitor tracking or marketing.



The user of the service may give his consent or refuse the use of cookies in the browser settings. Cookies are considered allowed unless explicitly blocked by the user in the browser settings. However, the pages do not function cannot be guaranteed if the use of cookies is prohibited. Unless you allow cookies, you will not be able to place an order and log in to the site. Cookies are blocked in your browser settings. For instructions on how to disable cookies, visit the browser manufacturer's support pages or other manufacturer-specific instructions.