



## **GRM-SERVICES OY'S CORPORATE CUSTOMER REGISTER PRIVACY POLICY**

GRM-services Oy is committed to ensuring the confidentiality and data protection of personal data in its possession and to complying with the applicable data protection legislation. This Privacy Policy applies to the processing of personal data of GRM-services Ltd's business customer contact persons. The Privacy Policy will be updated as necessary, for example, in case of changes in legislation.

### **1. The controller**

GRM-services Oy, Katriinantie 3 D 29, 01740 VANTAA, business ID 2738190-7

### **2. Contact person responsible for the register**

Antti Kivinen, antti.kivinen@grm-services.fi, +358 40 539 4224

### **3. Name of the register**

GRM-services Oy's customer register

### **4. Grounds for and purposes of the processing of personal data**

The processing of personal data is based on a legitimate interest of GRM-services Oy, a legal obligation, a contract, the consent of the data subject or any other material connection derivable from the aforementioned grounds. The purpose of the processing is the management of the customer relationship and the exercise of the rights and obligations of the customer and GRM-services Ltd. The data may also be used to plan and develop GRM-services Ltd's business and services.

### **5. Data content of the register**

The following information may be stored in the register for GRM-services Oy's business customers:

- contact person's first and last name, position, company/organization, customer's business ID, contact details for the workplace (phone number, e-mail address, address).
- information relating to the provision, purchase, use and development of services, marketing and sales.
- other information relevant to the management or development of the customer relationship.

The register may also contain personal data of potential customers.

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

The information in the register is collected from the customer himself in connection with the conclusion of a contract or other transactions. Information is obtained by e-mail, telephone, contracts, meetings with customers and other situations where the customer provides his or her data.

Information from representatives of businesses and other organizations can also be collected from public sources such as websites. Information may also be obtained from directory services and other businesses.

## **7. Disclosures and recipients of data**

Data is not regularly disclosed to other parties. However, data may occasionally be disclosed to public authorities in accordance with Finnish law, in order to comply with the controller's legal or regulatory obligations or in response to requests for disclosure by public authorities under the law.

In relation to the processing of personal data, data may also be transferred by the controller outside the EU or EEA to entities (e.g. cloud services) that are committed to complying with the requirements of the General Data Protection Regulation in ways that ensure adequate protection of personal data processing.

## **8. Principles of register protection and retention period**

The register is processed with due care and the data processed by the information systems are adequately protected. Access to personal data is restricted to those persons whose duties require them to process the personal data recorded in the register. Access to digital material is only possible with the personal user name and password of the authorized employee. Any manual material is kept in a locked room, accessible only to authorized persons.

When the data is stored on Internet servers, the physical and digital security of the hardware is adequately ensured. GRM-services Ltd will ensure that the stored data, as well as server maintenance identifiers and other information critical to the security of the service, are handled confidentially and only by those employees whose job description includes this.

The data collected in the register will be kept for as long as necessary to fulfil the purpose of the register, taking into account any retention periods required by law (such as the Accounting and Prepayment of Taxes Act).

## **9. Right of inspection and right to request correction of information**

Every person in the register has the right to check the information stored in the register and to request that any inaccurate or incomplete information be corrected or completed. If a person wishes to check or request a correction of the data recorded about him or her, the request must be made in person or by means of a signed or other authenticated document. GRM-services Ltd may, if necessary, ask the person making the request to prove his or her identity. GRM-services Ltd will respond to the customer within the time limits laid down in the EU General Data Protection Regulation.

## **10. Other rights of the data subject**

A person in the register has the right to request the erasure of personal data concerning him or her from the register ("right to be forgotten"). Data subjects also have other rights under the EU General Data Protection Regulation, such as the right to object to the use of personal data for direct electronic marketing and the right to restrict the use of personal data in specific situations as defined in the General Data Protection Regulation. Where personal data are processed on the basis of the data subject's consent, the data subject has the right to withdraw his or her consent by giving notice. Requests must be made in the course of a personal visit or by means of a signed or otherwise authenticated document. GRM-services Ltd may, if necessary, ask the applicant to prove his/her identity. GRM-services Ltd will respond to the customer within the time limits set by the EU General Data Protection Regulation.