## **Contract register - privacy policy**

Creation date	8.6.2021
Data controller	DataPartner Oy Raatihuoneenkatu 8 A +358-19-54 10 100 info@datapartner.fi
Contact person in matters related to the filing system	Jens Westerbladh Raatihuoneenkatu 8 A +358-19-54 10 100 jens.westerbladh@datapartner.fi
Name of filing system	Contract register
Purpose of personal data processing	The purpose of use for the filing system is to maintain, manage, archive, and process contracts signed with customers and other interest groups as well as to maintain customer relationships.  Information can be used to improve the company's operation, for statistical purposes, and for producing more personalised content. Personal data are processed in accordance with the requirements of the Personal Data Act.  Data in the filing system can be used in the company's own filing systems for example for targeted advertising without disclosing personal data to external parties. The company may use partners to maintain customer and
	service relations, which means that part of the data held within the filing system may be transferred onto a partner's server due to technical requirements. These data will be processed solely for the purpose of maintaining the company's customer relations using technical interfaces.
Legitimate interest basis	
Categories of personal data in question	
Recipients and recipient groups	
Concent	The consent can be withdrawn by sending an free form e-mail to info@datapartner.fi.
Data content of filing system	Contract register contains the following information: - First and last name of person - Community represented - Business ID - Email address - Postal address - Phone number - Ordered services - Other jointly agreed upon business matters
Regular data sources	Phone and other electronic methods of communication.  Data can also be obtained from subcontractors related to the use or production of a specific service.  Data on the customers' other activities in the digital environment can be obtained from partner websites, data systems or other digital sources using electronic sign-in (link), cookies or customer-specific identifiers.

	Data in the contract register are used solely by the company, except when an external service provider is used either to provide added value services or to support credit-related decision-making.  Data will not be disclosed to external parties or to the company's partners except for purposes related to credit applications, debt collection or invoicing as well as in situations required by law. A data subject's personal data will be removed upon the data subject's request unless such removal is prohibited by legislation, outstanding invoices, or debt collection.
Storage time	Archived after 10 years.
Regular disclosure of data	Data in the filing system are used solely by the company, except when an external service provider is used either to provide added value services or to support credit-related decision-making.  Data will not be disclosed to external parties or to the company's partners except for purposes related to credit applications, debt collection or invoicing as well as in situations required by law.  A data subject's personal data will be removed upon the data subject's request unless such removal is prohibited by legislation, outstanding invoices, or debt collection.
Transferring data outside the EU or the EEA	Personal data will not be transferred outside the European Union unless necessary for ensuring the technical implementation of the company's or its partners' activities.
Filing system's principles of protection A: Manual material	Contact information collected during customer events and other manually processed documents containing customer data are stored in a locked and fireproof space after initial processing. Only specific employees who have signed confidentiality agreements have the right to process manually stored customer data.
Filing system's principles of protection B: Electronically processed functions	Only specific employees working for or on behalf of the company have the right to use the contract register and maintain data stored in it. Each specific user has his or her personal username and password. Each user has signed a confidentiality agreement. The system is protected by a firewall to prevent external attacks on the system.
Rights of the data subject	
Cookies	
Information source	e-mail, calls, form in webshop, visits and letters.
Automatic processing and profiling	
Right of access	The data subject has the right to check what data has been stored about him or her in the filing system. A request for data access must be given in writing by contacting the company's customer service or the filing system's contact person either in Finnish, Swedish or English. The request for data access must be signed. The data subject has the right to prohibit the processing of his or her data and its disclosure for the purposes of direct marketing, distance marketing or opinion polls by contacting the company's customer service.
Right to lodge	

Right of portability	
Right to rectification	Taking into account the purposes of processing, any data stored in the filing system that is inaccurate, unnecessary, incomplete, or outdated must be erased or rectified.  A written request for rectification, signed by hand, should be sent to the company's customer service or the personal data filing system's administrator.  The request should specify what information should be rectified and on what grounds. Rectification shall be carried out without delay.  Notification of rectification will be sent to the party who provided the inaccurate data or to whom the data were disclosed.  If a request for rectification is denied, the responsible person of the filing system will provide a written document stating the grounds for the denial of the request for rectification. The data subject concerned may then pass the matter along to the Data Protection Ombudsman.
Other rights related to the processing of personal data	Right to restrict processing The data subject has the right to request that the processing of their personal data is restricted for example if data stored in the filing system is erroneous. Requests should be sent to the responsible person of the filing system.  Right to object The data subject has the right to request for personal data pertaining to them, and the data subject has the right to request for the rectification or erasure of said data. Request can be sent to the contact person of the filing system.  If you are acting as the contact person of a company or organisation, your data cannot be erased during this time.  The data subject has the right to prohibit the disclosure of processing of personal data for the purposes of direct marketing or other marketing, the right to demand the anonymization of data where applicable, as well as the right to be completely forgotten.