

19.6.2019

Deltagon Group Oy's Customer Register Privacy Policy

1. General

This Customer Register Privacy Policy describes how Deltagon Group Oy (hereinafter referred to as “**Deltagon**”) processes the personal data of the representatives of Deltagon's customers for the purposes related to maintaining the customer relationship.

2. Controller and contact person of the register

Name: Deltagon Group Oy
Address: Tekniikantie 4 B
02150 Espoo, Finland
Phone: +358 9 685 0320
Business ID: 0948181-6

Contact person: Jussi Ranta
Email address: compliance@deltagon.com

3. The purpose and basis for processing personal data

The basis for processing personal data is fulfilling a contract between the data subject's employee and Deltagon or Deltagon's legitimate interest (maintaining customer relationship).

The purpose of processing personal data is to maintain contact with Deltagon's customers and other maintenance of the customer relationship.

4. The processed personal data

Deltagon processes the following personal data of the representatives of its customers or potential customers:

- the person's name and occupation;
- the person's contact details (email address and telephone number); and
- data on the contacts and communication between the parties.

5. Regular data sources

Personal data are collected directly from the data subject (for example, the data subject's contact requests via Deltagon's website and the data subject's business cards) and from the customer contracts between the data subject's employer and Deltagon.

6. Regular disclosures of personal data

Personal data are not disclosed to third parties.

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7. Transfer of personal data outside the EU or EEA

Personal data are not transferred outside the European Union or the European Economic Area.

8. Data protection principles

Manual documents are stored in a locked space that only designated persons can access. Digitally processed personal data are protected and stored in Deltagon's data system that has restricted access to only such persons who need the data in question to perform their work duties. The persons in question have personal user IDs and passwords.

The personal data sent outside of Deltagon are encrypted.

9. Storage period of personal data

Personal data are stored for as long as the customer relationship is in force. Once the customer relationship is terminated, personal data are stored for a maximum of one year after the termination of the customer relationship. Personal data can be stored for longer than this if the applicable law or Deltagon's contractual obligations towards third parties demand a longer storage period.

10. Rights of the data subject

According to the applicable data protection legislation, a data subject has the right at any time to:

- control what data on the data subject Deltagon processes;
- demand the rectification, completion or erasure of personal data;
- object to the processing of personal data on grounds relating to their particular situation, if the basis for processing is Deltagon's legitimate interest;
- demand the restriction of processing of the data subject's personal data; and
- receive their personal data in a machine-readable format and transfer the data in question to another controller, provided that the data subject has supplied the personal data to Deltagon themselves, that Deltagon processes the personal data in question on the grounds of a contract, and that the processing is carried out by automated means.

The data subject can make a request based on the aforementioned rights by contacting Deltagon personally, by letter or via email to the address referred to in section 12 of this privacy policy. Deltagon may ask the data subject to clarify the request in writing and to prove their identity before processing the request. Deltagon may refuse to fulfil the request on the grounds provided for in the applicable law.

The data subject has the right to lodge a complaint to a competent supervisory authority if the data subject considers that Deltagon has not processed the personal data according to the applicable data protection legislation.

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11. Contact

Requests for using the data subject's rights, questions on this privacy policy and other contacts should be made via email to compliance@deltagon.com. The data subject may also contact Deltagon personally or send a letter to:

Deltagon Group Oy
Compliance
Tekniikantie 4 B
02150 Espoo
FINLAND

12. Changes

This privacy policy may be updated from time to time if, for example, the legislation changes. This privacy policy was updated on 12 February 2019.