

19.6.2019

Deltagon Group Oy's Marketing Register Privacy Policy

1. General

This Marketing Register Privacy Policy describes how Deltagon Group Oy (hereinafter referred to as "**Deltagon**") processes the personal data of the representatives of Deltagon's customers and potential customers for marketing purposes.

2. Controller and contact person of the register

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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 grounds for processing personal data is Deltagon's legitimate interest to implement direct marketing. The grounds for sending electronic direct marketing messages is consent from the data subject.

The purpose of processing personal data is marketing Deltagon's products and services to customers and potential customers. Deltagon may carry out profiling of personal data to target marketing.

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

5. Regular data sources

Personal data is collected from:

- the data subject (for example, the data subject's contact requests via Deltagon's website and the data subject's business cards);
- other employees of the company that the data subject represents;
- through networks and events;

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- from publicly available sources; and
- purchased direct marketing registers.

6. Regular disclosures of personal data

Personal data are not disclosed to third parties.

7. Transfer of personal data outside the EU or EEA

Some of the data in the marketing register is at the Hubspot Inc. server in the United States. Hubspot Inc. is registered in the Privacy Shield system, so the basis for transfer is the European Commission's adequacy decision regarding the level of data protection.

Deltagon may also use other service providers that are outside the European Union or the European Economic Area for the processing of personal data. The transfer of personal data outside the European Union or the European Economic Area is always implemented based on one of the legal grounds mentioned below:

- the European Commission has decided that an adequate level of data security has been confirmed in the recipient country in question;
- Deltagon has implemented appropriate protection measures for the transfer of personal data by using standard data-protection clauses approved by the European Commission. Therefore, the data subject has the right to receive a copy of the standard clauses in question by contacting Deltagon according to the methods referred to in section 14; or
- the data subject has given their explicit consent to the transfer of personal data, or there is another legal basis for transferring the personal data.

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 is stored in the direct marketing register for as long as the data subject is active in duties that the marketed product or service relates to and provided that the data subject has not refused direct marketing. In this case, it is, however, possible to store data on the refusal of direct marketing in the direct marketing register. Once Deltagon is notified that the person is no longer in the duty that would fulfil the grounds for processing personal data, the person will be marked as "Not active" in the system and then removed from the system.

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10. Profiling

Deltagon may implement automated profiling of the data subject as a part of the processing of personal data. Due to the profiling, the data subject will receive marketing messages that are better targeted at them.

Profiling can be done based on occupation, business sector or the size of the company. Communication may also be targeted based on what the data subject has shown an interest in.

11. Right to object to the processing of personal data

The data subject has the right to object to the processing of personal data for direct marketing purposes and the right to object to profiling at any time.

The data subject can make a request for the implementation of the right to object by contacting Deltagon personally, by letter or via email to the address referred to in section 14 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.

The data subject may give Deltagon channel-specific consents and bans (for example, ban email marketing messages but consent to marketing messages by post).

12. Other 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;
- withdraw their consent as far as the processing of personal data is based on the data subject's consent;
- 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 14 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.

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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13. 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

14. 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.