

Insta Group Oy

Customer register privacy statement

Insta respects every person's privacy and personal data protection and is committed to keeping personal data safe as required by law. This privacy statement describes the policies that are applied to the personal data Insta collects and processes from its customers.

1. Controller

Name: Insta Group Oy

Business ID: FI01540885

Address: Sarankulmankatu 20, FI-33901 Tampere

Telephone: +358 20 771 7111

Email: security.support@insta.fi

Identity and contact information of the controller's representative:

Responsible person: Tero Leppänen, Chief Security Officer, Insta Group Oy

Tel. +358 40 772 3002 (tel. +358 20 771 7111)

Email: tero.leppanen@insta.fi

PO Box 80, 33900 Tampere, FINLAND

2. Purposes of personal data processing

The purpose of the customer register processing is to:

- manage customer relationships and customer service
- meet the rights and obligations of both the customer and the controller
- process personal data in accordance with the applicable data protection legislation for purposes related to the controller's products and services, such as their development, offering, execution, marketing, maintenance and technical support
- channel the controller's advertising and/or direct marketing (including newsletter) based on customer data via the controller's communications media and services. The purpose of the advertising and contacting is to enable the high-quality marketing of Insta Group Oy's and its group companies' products and services to potential customers and partners by such means as newsletters.
- process data pertaining to representatives of customer organisations that participate in the controller's training events and courses

3. Legal basis for personal data processing

The legal bases for personal data processing are agreement, consent and the controller's legitimate interest.

The controller's legitimate interest is the basis for processing when the data subject and controller have a relevant connection. Such a relevant connection is formed when the data subject contacts the controller on his or her own initiative, or when the controller processes the data subject's personal data in conjunction with business or collaboration operations between the data subject's employer and the controller, for example.

Based on its legitimate interest, the controller may also record in the customer register data related to such potential customers' contact persons and representatives whom the controller may justifiably assume to be interested in acquiring services or products offered by the controller.

The controller's electronic direct marketing is sent in compliance with the applicable data protection legislation to data subjects who have given their voluntary consent to direct marketing (opt-in), or to whom the controller's products and services have a relevant connection considering the recipient's area of responsibility and work duties (opt-out). When the data subject is asked to give his or her consent to electronic direct marketing, they are notified at the same time that they can cancel their consent easily and at any time. The consent can be cancelled by notifying the controller or by clicking the cancellation option available with each marketing message (the "Unsubscribe" function), in which event the data subject's data is removed from the controller's subscriber list for electronic direct marketing.

4. Personal data groups processed

The register contains data on the following individuals:

- Representatives and contact persons of the controller's customers (customer, agreement or collaboration relationship)
- Potential customers (relevant connection, legitimate interest)

The following data, related to the data subject and necessary for the purposes mentioned above, is processed:

- Name
- Email address
- Telephone number
- Company and position
- Company address
- Additional information provided by the person him/herself
- Customer relationship-based data, such as contact history, feedback and monitoring data

Student registers contain the following additional data:

- grades and completion dates
- if needed, the student's date of birth for identification purposes

The customer register also contains names of the controller's responsible people.

It is necessary for the controller to collect and/or process the above-mentioned personal data to be able to maintain a customer, business, collaboration and/or agreement relationship with the party on behalf of which the data subject is in contact with the controller (such as the data subject's employer).

It is not obligatory for the data subject to provide his or her personal data to the controller as such, but neglecting to do so may complicate the above-mentioned relationship between the controller and the party represented by the data subject as described above.

5. Regular information sources for the register

Personal data has been collected from the following information sources:

- directly from the data subject him/herself
- publicly/openly available sources (such as the Internet and trade registers)
- the data subject's employer or a representative of another party that is in a customer, business, collaboration or agreement relationship with the controller
- Suomen Asiakastieto Oy's registers are used for checking company data in business contexts, and these reports may also contain data on company representatives

6. Recipients of personal data

In addition to the parent company Insta Group Oy, the Insta group consists of Insta DefSec Ltd, Insta Automation Oy and Insta ILS Oy. Due to internal administrative reasons, personal data included in the controller's customer register may be processed within the Insta group based on legitimate interest.

By default, the controller shall not disclose data subjects' personal data to parties external to the Insta group, unless lawfully required to do so by authorities or if necessitated by compelling legislation.

Notwithstanding the above, the controller uses reliable service providers in conjunction with the technical execution of its services, and these service providers process personal data on behalf of the controller by virtue of a data processing contract made between the controller and the service providers and required by the applicable data protection legislation. The service providers process the personal data according to the controller's responsibility and their documented instructions. The service providers used by the controller include CRM system service providers, a training platform service provider and a marketing and newsletter service provider.

Student register data may be disclosed to a customer organisation with whom the student has participated in training and, with the data subject's permission, for purposes for which the data subject has given his or her permission when joining the register.

7. Personal data storage period

The controller shall only process and store data for as long as necessary for the pre-specified purpose of use of the personal data. The personal data included in the customer register shall be processed for the duration of the active customer relationship.

Any personal data that has become obsolete and the register keeper no longer has grounds to store or process shall be removed on a regular basis (at two-year intervals at the latest) according to the controller's own data protection policies. Personal data becomes obsolete when, for example, the customer, business, collaboration or agreement relationship with the controller has ended, with the exception of cases where legislation requires that the personal data is stored.

8. Rights of the data subject

A data subject has the following, case-specifically applied rights:

Right to withdraw consent

By virtue of Article 7 of the EU general data protection regulation (679/2016, "GDPR"), the data subject has the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Right of access by the data subject

By virtue of Article 15 of the GDPR, the data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her is being processed, and, where that is the case, access to the personal data and specific information on the processing of personal data as further specified in the article.

Right to rectification

By virtue of Article 16 of the GDPR, the data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Right to erasure

By virtue of Article 17 of the GDPR, the data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the grounds specified in the article applies.

Right to restriction of processing

By virtue of Article 18 of the GDPR, the data subject shall have the right to obtain from the controller restriction of processing where one of the grounds specified in the article applies.

Right to data portability

By virtue of Article 20 of the GDPR, the data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit this data to another controller without hindrance from the controller to which the personal data has been provided, where the processing is based on consent or on a contract and the processing is carried out by automated means.

In exercising his or her right to data portability pursuant to the above, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

Right to object

By virtue of Article 21 of the GDPR, the data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her where based on the legitimate interests pursued by the controller, including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Where personal data is processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

Right to lodge a complaint with a supervisory authority

If the data subject finds that the controller is in breach of the applicable legislation on personal data processing and data security, the data subject shall have the right to lodge a complaint with a supervisory authority.

Responsibilities of the controller pursuant to data subjects' rights

The controller shall communicate to the data subjects the actions taken pursuant to a request made by virtue of articles 15–22 without undue delay and no later than a month from receiving the request. If necessary, the due time may be extended by two months at the most, considering the complexity and number of requests. The controller shall notify the data subject of any such extensions within a month of receiving the request and communicate the cause of the delay. If the data subject submits his or her request electronically, the data must be delivered electronically if feasible, unless the data subject requests otherwise.

If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

Exercise of rights

You may exercise your rights as a data subject as described above by contacting the controller according to the contact information provided in paragraph 1 of this privacy statement. We strive to respond to you as quickly as possible and, if needed, we will provide further instructions or ask additional questions based on your request.

Please note that we have the right and obligation to verify your identity before executing the request, and we therefore need to be able to adequately identify you.

If your request is evidently groundless or unreasonable, we may either charge a reasonable fee for executing the request based on administrative expenses or refuse to execute the requested action.

9. Personal data processing and profiling

The controller does not only use automatic decision-making, such as automatic profiling, as part of its personal data processing.

The customer register is used for maintaining and making use of data required by customer relationship management and development. The student register is used for maintaining data on training attendants and their performance as required by customer contracts.

The marketing and contact register is used for sending newsletters, for example, and newsletter reading activity and the readers' interests are monitored for the purpose of content development and targeted marketing and sales measures.

10. Further processing of personal data

The controller shall not process personal data for other purposes than those described in this privacy statement.

Should the controller further process personal data for any other purpose, it is obliged, pursuant to data protection legislation, to communicate such a purpose to the data subjects before the further processing. In this event, the controller must also provide all additional information related to the matter.

11. General description of the controller's appropriate technical and organisational security measures

Access to the customer register has only been given to such specified employees working in the controller's customer relations and sales functions who have signed appropriate non-disclosure agreements.

The controller has given its employees binding written instructions and orders regarding personal data processing and data security, and the employees have undertaken to obey them.

The data security of information systems has been arranged appropriately by means of encryption and technical constraints, for example.

The controller audits its personal data processing measures and the systems and equipment used in them on a regular basis and, among other things, assesses the risks involved in its personal data processing measures when adopting new technology, for example.

12. Changes to the privacy statement

The controller may change this privacy statement. The controller shall let the data subjects know of any significant changes to this privacy statement and processing measures in reasonable time before the effective date on its website and/or other appropriate means to provide the data subjects with reasonable time to assess the consequences of the changes.