

PRIVACY POLICY FOR A CUSTOMER REGISTER

This is WS-Expogroup Oy Ltd's register and privacy policy according to the Finnish Personal Data Act (Sections 10 and 24) and the EU's General Data Protection Regulation (GDPR). Prepared on 25 May 2018. Latest revision on 25 May 2018.

1. Controller

WS-Expogroup Oy Ltd, Hannuksenpelto 1, 02270 Espoo, Finland.

2. Contact person responsible for the register

Paul Franzén, paul.franzen@wsexpogroup.fi, tel. 041 5370 101.

3. Name of the register

WS-Expogroup Oy Ltd's customer register.

4. Purpose of the processing of personal data

Personal data are processed for purposes related to the management, administration and development of customer relationships, the provision and delivery of services, the development of the services, and invoicing. Personal data are also processed for purposes required by the resolution of any customer complaints and other demands.

In addition, personal data are processed in communications directed at customers, such as for information and news reporting purposes and in marketing, where personal data are processed for purposes related to direct marketing and electronic direct marketing.

Customers have the right to prohibit direct marketing aimed at them.

5. Legal bases for processing

The legal bases for processing are the following grounds according to the EU's General Data Processing Regulation (hereinafter also the "GDPR"):

(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes (GDPR, Article 6, point 1a);

(b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (GDPR, Article 6, point 1b);

(c) processing is necessary for compliance with a legal obligation to which the controller is subject (GDPR, Article 6, point 1f).

The aforementioned legitimate interest of the controller is based on the relevant and appropriate relationship between the data subject and the controller, which is a consequence of the fact that the data subject is a client of the controller, and when processing takes place for purposes that the data subject can reasonably have expected at the time of the collection of the personal data and in the context of the appropriate relationship.

The data will not be used for automated decision-making or profiling.

6. Information contents of the register

Details stored in the register include: the person's name, company/organisation, contact details (telephone number, email address, address), information about services ordered and changes in them, invoicing details, other details related to the customer relationship and the services ordered.

7. Regular sources of data

Information stored in the register is obtained from customers, such as from contacts made with a Web form through the website www.wsexpogroup.fi maintained by WS-Expogroup, via email, by phone, through social media services, from contracts, from meetings with customers, and from other situations in which customers disclose their data.

The information can be updated from details obtained from authorities, organisations and enterprises that provide updating services, from public registers, and from other public sources.

8. Storage period of personal data

Data collected for the register are only stored for the period and in the scope necessary in relation to the original or compatible purposes for which the personal data have been collected.

9. Regular disclosure of data and data transfer outside the EU or EEA

No data will be regularly disclosed to other parties. Data can be published to the extent this has been agreed on with the customer.

No data will be disclosed outside the EU or EEA.

10. Principles for the protection of the register

Care is observed in the processing of the register, and data processed by means of information system are protected appropriately. The controller ensures that data stored, access rights to servers, and other details critical for the security of the personal data are processed confidentially and only by employees whose job description includes such processing.

Data in the register are stored in the controller's system that is protected by means of protection software in the operating system. Access to the system requires the entry of a username and password. The system is also protected by firewalls and other technical means. Data included in the register are located in locked and guarded facilities.

11. Right of inspection and right to demand correction of data

Every person in the register has the right to verify and receive the personal data concerning him or her, which are stored in the register, in a structured, commonly used and machine-readable format, and to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her, or to have incomplete personal data completed. If a person wishes to verify data stored on him or her or demands that they be rectified, such a request must be sent to the controller in writing. The controller can ask the person submitting the request to verify their identity, if necessary. The controller will provide a response to the customer within the time limit provided in the EU's General Data Processing Regulation (within one month as a rule).

12. Other rights related to the processing of personal data

Any 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's General Data Protection Regulation, such as the right to restriction of processing in certain situations. Such requests must be sent to the controller in writing. The controller can ask the person submitting the request to verify their identity, if necessary. The controller will provide a response to the customer within the time limit provided in the EU's General Data Processing Regulation (within one month as a rule).