

PRIVACY POLICY

Registrar

FSOE Oy (3516158-4)
Later in this report *Company*

Data protection officer and/or contact person

Jesse Sormunen
0504061000
info@fsoe.fi

Name of the personal register

FSOE customer and marketing register

This privacy policy applies to the processing of personal data related to our websites, marketing and customer relationship management, and the products and services we offer.

Personal data collected and data sources

We collect personal data necessary to manage the customer relationship.

Data group	Examples of information content
Identification and contact information	The name and contact information of the customer and/or representative, as well as the personal identification number, for the purpose of implementing the agreement.
Information regarding products and services, their orders and customer communications	Information about orders, delivery time of orders, and information related to contracts, invoicing, customer communications, and complaints.
Information related to marketing (including direct marketing) and events, as well as consents and prohibitions given by the data subject	Contact information for marketing purposes, as well as information collected in connection with events and occasions. Consents and prohibitions regarding direct marketing.
Websites and other electronic services usage information	IP address, electronic communication identification information, search and browsing information, browser and operating system information, and registration information

We collect personal data from the data subject themselves, as well as from publicly available registers maintained by authorities and other external sources, such as the trade register or other

from the corresponding public business register. In addition, we collect information from those who fill out contact forms and use it for the above-mentioned purposes related to maintaining the customer relationship.

Purpose of use and basis for processing personal data

Personal data is processed within the limits permitted by applicable law for the following purposes:

- delivering products and services and concluding customer contracts (contractual relationship or its preparation)
- managing customer relationships (legitimate interest)
- providing information and advice about services (legitimate interest)
- testing of the web service (legitimate interest)
- development of products and services (legitimate interest)
- collection and analysis of user statistics (consent, legitimate interest)
- improving the user experience of our website and other services (consent, legitimate interest)
- invoicing, credit decisions and debt collection (legitimate interest)
- marketing communications (legitimate interest)
- direct marketing, including electronic direct marketing and telemarketing, as well as planning and measuring the effectiveness of advertising and marketing, and combining and updating personal data for direct marketing purposes (legitimate interest, consent)
- managing stakeholder relations and subcontracting and working with service providers cooperation (legitimate interest, contractual relationship or its preparation)
- internal reporting and other administrative measures (legal obligation compliance)
- handling warranty and defect liability issues, as well as handling complaints and litigation and handling official procedures (legitimate interest)
- preventing and investigating abuses, as well as protecting information, people and property ensuring safety (legitimate interest)
- fulfilling other statutory obligations (e.g. accounting and tax-related activities) and reporting obligations

and, when the processing of personal data is based on the consent given by the person, the person may withdraw their consent at any time by notifying the contact person mentioned above.

The processing of personal data may be necessary to implement the legitimate interests of the customer relationship between the Company and the data subject. The Company has a legitimate interest in processing personal data for marketing, service and customer analyses and service testing. Marketing purposes may also involve profiling. The data subject has the right to object to the processing of personal data. When personal data is processed based on a legitimate interest, we have assessed the benefits and potential disadvantages of the processing for the data subject and assess that the rights and interests of the data subject do not override the legitimate interest. We will provide further information on the processing of personal data based on a legitimate interest upon request.

Personal data processors

Only persons responsible for customer relationship management and marketing have access to personal data.

Recipients of personal data

Various service providers and other third parties may also be used to process personal data, such as providers of technical solutions or server space, or providers of accounting and financial management services. We ensure that we have agreements with the parties we use to process personal data as required by data protection legislation.

Personal data may be disclosed to third parties in situations where required by law or authorities, or to investigate abuses, and to ensure security. In addition, personal data may have to be disclosed in connection with lawsuits or similar legal proceedings.

If the Company is involved in a merger, business transaction or other corporate arrangement, personal data may be disclosed to the parties to the arrangement or to parties assisting in the arrangement.

We will provide additional information about the recipients of personal data upon request.

Transfer of personal data outside the European Economic Area

Personal data will not be transferred outside the European Union or the European Economic Area unless it is necessary for the technical implementation of the service. In any situations where data is disclosed and transferred, the level of data protection required by data protection legislation and other necessary security measures will be observed.

Upon request, we will provide additional information regarding the transfers of personal data and the protection mechanisms used.

Cookies

We use cookies and other similar technologies on our website. A cookie is a small text file that is stored by the browser on the user's device. Cookies contain an anonymous, unique identifier that allows us to recognize and count the different browsers that visit our website.

The purpose of using cookies and other similar technologies is to analyze and further develop our services to better serve users and to target advertising. The user can manage their consent through the cookie tool on our website.

Personal data protection

We protect personal data using appropriate technical and organizational methods. The data is collected in databases that are protected by firewalls, passwords and other technical security measures. Databases and their backups are located in locked and guarded facilities and only certain, pre-designated persons have access to the data.

Retention period and destruction of personal data

Personal data will be stored for as long as it is needed for the purpose for which it was collected and processed, or for the performance of a contract, or as long as required by law and regulations. After this, the personal data will be appropriately destroyed.

Data subject rights

The data subject has the following rights:

1. Right to access personal data. The data subject has the right to receive confirmation as to whether the data subject's personal data is being processed and other information in accordance with data protection legislation on the processing of personal data. The data subject has the right to receive a copy of the personal data.
2. The data subject may request correction of data if the data is incomplete or incorrect.
3. The data subject may request the deletion of data when there is no reason for its processing referred to in data protection legislation and independent of the data subject's consent.
4. The data subject has the right to restrict the processing of personal data if the accuracy or lawfulness of the data so requires, or in accordance with the right to object, the data subject requests that the processing of personal data be limited to the storage of the data only. The data subject has the right to object to the processing of data for direct marketing purposes based on the Company's legitimate interest.
5. The data subject may request the transfer of data to another controller. The right to transfer applies in principle to personal data that the data subject has provided to the controller in a structured and machine-readable format, and the processing of which is based on the data subject's consent or agreement, and/or the processing of which is carried out automatically.
6. Right to withdraw consent. If the processing of personal data is based on the consent given by the data subject, the data subject has the right to withdraw his or her consent to the processing of personal data concerning him or her. Withdrawal of consent does not affect processing carried out before the withdrawal.
7. The data subject must send requests regarding their rights in writing or by email to the following contact details:

Inspection/other personal data request
info@fsoe.fi

The identity of the requester may be verified before processing the request. The company will respond to requests within 1 month of the request being submitted, unless there are special reasons to extend the response time.

The data subject has the right to lodge a complaint with the competent data protection authority if the data subject believes that his or her personal data has been processed in violation of data protection legislation.

The contact information for the Finnish Data Protection Authority is [here](#).