

PRIVACY STATEMENT FOR THE PERSONAL DATA REGISTER OF THE KASVUCRM CUSTOMER RELATIONSHIP MANAGEMENT SYSTEM

This privacy statement concerns the practices associated with the personal data register of the KasvuCRM customer relationship management system. The statement explains how users of the KasvuCRM system (later referred to as Joint Controllers) process the personal data of their current and potential customers' contact persons as part of their customer relationship and marketing activities.

The Joint Controllers undertake to comply with the data protection and personal data legislation valid in Finland, including the EU General Data Protection Regulation (GDPR) as well as any other acts and statutes applicable to their activities that direct the processing of personal data, and to process personal data in accordance with good data management and processing practices.

REGISTER NAME

Personal data register of the KasvuCRM customer relationship management system

JOINT CONTROLLERS AND THEIR CONTACT POINTS FOR DATA PROTECTION ISSUES

The KasvuCRM customer relationship management system is a joint system in which the parties who store data in the personal data register each serve as controllers of their data and are responsible for ensuring that the data they have saved are correct and up to date.

The Joint Controllers and their data protection officers can be contacted about issues relevant to this personal data register through the contact points listed below:

Organisation & data protection officer's contact details	Contact point for data protection issues
ELY Centre and TE Offices tietosuoja.keha@ely-keskus.fi	https://www.ely-keskus.fi/web/ely/kirjaamojen-yhteystiedot
Ministry for Foreign Affairs tietosuoja@formin.fi	kirjaamo.um@formin.fi
Finnish Safety and Chemicals Agency TUKES tietosuoja@tukes.fi	tietosuoja@tukes.fi
Business Finland innovation funding centre, business ID: 0512696-4 tietosuoja@businessfinland.fi	tietosuoja@businessfinland.fi
Business Finland Oy, business ID: 2725690-3 tietosuoja@businessfinland.fi	tietosuoja@businessfinland.fi
Finnvera, business ID 1484332-4 tietosuojavastaava@finnvera.fi	www.finnvera.fi -> Online Service -> Messages; heading Other

PURPOSE AND DATA CONTENT OF THE REGISTER AND GROUNDS FOR PROCESSING DATA

The data in the KasvuCRM system are used in the customer relationship and marketing activities of the controllers' current and potential customers for business promotion purposes. The register may be used to save and process public data associated with companies. The following data on a

company's contact persons and officers may also be saved in the register; all the data listed below may not be recorded on all persons:

- Identifiers: name, home country, domicile, postal address, e-mail address, telephone number as well as the person's title and role in the company
- Additional information: Alias; name, address and title in native language; address and title; the country in which the person works; industrial sector; capital investment profile; expert classification; work description; other description
- Information on business advice or other services provided for the person and identifiers of a person for whom service has been provided
- Data on any changes to the data listed above

The register may also contain other notes related to data subjects and their potential customer relationships as well as other information needed for the proper management of a customer relationship. This information may include data on the data subject's past or future participation in events or contact requests, or data on services ordered by the data subject, their delivery and billing.

Depending on the case, the processing of personal data will be based on one of the following:

- Processing is needed to prepare or perform a contract to which the data subject is a party.
- Processing is needed to fulfil the controller's legal obligation.
- Processing is needed for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
- Processing is needed for the purposes of a controller's legitimate interests; only in cases when this is considered to also be in the data subject's interest.

The KasvuCRM system is owned by the Ministry of Economic Affairs and Employment, which is responsible for the system's general functioning as well as the user interface for saving, combining, disclosing and other processing of data, the usability of the system, and the integrity, protection and storage of the data contained in it.

DATA SOURCES

The personal data in this register are obtained either from

- a national customer information warehouse for business services (ATV),
- directly from the data subject,
- from the data subject collected by a third party in connection with events, or
- from public data sources.

STORAGE PERIOD OF PERSONAL DATA

The data collected in the register are stored for no longer than and only to the extent that this is necessary and allowed under legislation with regard to the original purpose for which the personal data were collected, or compatible purposes. Personal data that mainly concern natural persons are stored for no more than five years after they were last processed for the purposes of providing services. Data will not be deleted, however, if preserving them is necessary in order to perform a statutory obligation or due to a pending matter.

In addition, the Joint Controllers will take every reasonable step to ensure that personal data which are inaccurate or outdated having regard to the purposes for which they are processed are rectified or deleted without delay.

PRINCIPLES OF REGISTER PROTECTION

The Joint Controllers have taken the appropriate technical and organisational measures to ensure that the personal data are protected against accidental or unlawful loss, disclosure, misuse, alteration, destruction or access.

Instructions for using the register have been issued within the Joint Controllers' organisations, and access to the register has been restricted by means of user rights, ensuring that the personal data saved in the system can only be accessed and used by employees who have the right to do so because of their tasks and who need this data in their duties.

The information system used to process personal data has been sufficiently protected by technical measures, and access to it is protected by appropriate methods, including personal user IDs and passwords. Backup copies are made of the data in the register, and they can be recovered safely if necessary. Materials containing personal data are destroyed securely.

DISCLOSURES AND TRANSFERS OF DATA AND AUTOMATED DECISIONS

The keeping of this register is based on the Act on the customer information system for business services (laki yrityspalvelujen asiakastietojärjestelmästä, 293/2017), under which data in the register may be disclosed, in addition to the Joint Controllers, to the Ministry of Agriculture and Forestry and the Agency for Rural Affairs.

Otherwise personal data will be disclosed to parties other than the Joint Controllers and the system owner in a format in which individual users could be identified in the following exceptional situations only: if obliged to do so under an act or an official order or by a court order, or if this is otherwise necessary to prevent or investigate suspected violations of an act, the terms of online service use or good practices, or to protect the rights of the Joint Controllers or third parties.

The personal data in the file will not be transferred or delivered to non-EU or EEA countries. No automated individual decisions or profiling will be carried out based on the personal data in the file.

DATA SUBJECT'S RIGHTS

After providing details necessary for finding the data, a data subject has the right to know what data on them have been saved in the KasvuCRM system personal data register, or whether or not the register contains data on them. An access request may be made once a year free of charge. The data subject may demand that any incorrect, incomplete or outdated data on them be corrected.

A request for access and/or corrections should be addressed to one of the Joint Controllers whose contact details are given at the beginning of this statement. Each Joint Controller will respond to the information request individually for the part of the data they administrate. An effort will be made to respond to an access request within a month of it being made.

The data subject has the right to file a complaint concerning matters related to the processing of their personal data to a supervisory authority. The data subject also has the right to request that their personal data be removed from the file, provided that the data are no longer needed for the purpose for which they were collected or for which they were otherwise processed, or that no legal obligations applicable to the Joint Controllers are associated with their processing or preservation. The data subject also has the right to request that the processing of their personal data is restricted,

or oppose the processing of personal data on them, for example for direct marketing purposes or profiling associated with such marketing.

PRIVACY STATEMENT UPDATES

This privacy statement was last updated on 28 May 2018.

The Joint Controllers will monitor any changes to data protection legislation and strive for continuous improvement of their activities. They thus reserve the right to update this privacy statement.