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# **PRIVACY STATEMENT**

The purpose of this privacy statement is to provide data subjects with the information required by the information obligation of the EU General Data Protection Regulation (2016/679).

Date of creation 24 May 2018.

## 1. Controller

Kopiosto ry (0414755-2) Hietaniemenkatu 2, FI-00100 Helsinki tel. +358 (0)9 431 521, kopiosto(at)kopiosto.fi

Contact person in matters concerning the registry: Kirsi Ruotsalainen Hietaniemenkatu 2, FI-00100 Helsinki tel. +358 (0)9 431 521, kirsi.ruotsalainen(at)kopiosto.fi

Contact person in matters concerning data protection: Sami Kokljuschkin Hietaniemenkatu 2, FI-00100 Helsinki tel. +358 (0)9 431 521, sami.kokljuschkin(at)kopiosto.fi

## 2. Name of the registry

Customer registry of Kopiosto

#### 3. Data subjects

Kopiosto's customers and contact persons for Kopiosto's customer communities.

## 4. Purposes and legal basis of the processing of personal data

The personal data are processed only for the following pre-defined purposes.

The personal data recorded in this registry are used for the establishment and maintenance of the customer relationship, invoicing as well as other management of the customer relationship.

The processing of data subjects' personal data is based on a customer relationship (agreement or order and the implementation thereof). Direct marketing targeted at companies is also carried out based on the controller's legitimate interest.

Based on specific consent from the data subject, contact information may also be used for other marketing by Kopiosto.

#### 5. Data content of the registry

The data stored about a customer community may include the community's name, address, business ID and invoicing details.

The personal data stored may include the contact person's name, job title, phone number, fax number and email address.

#### 6. Retention period of the personal data

The personal data will be stored for the duration of the customer relationship (of the customer community). The personal data will be removed if they are outdated or changed and the controller is informed about this.

## 7. Rights of the data subject

Data subjects have the right to inspect any personal data on them stored in the registry and request the controller to rectify or complete any inaccurate or incomplete data.



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Data subjects using Kopiosto's e-services may also access and rectify the personal data stored about them by logging in to the service with their user credentials.

Data subjects have the right to have any personal data on them removed from the registry. However, this does not apply to such personal data that are necessary for implementing the purposes of this privacy statement as defined by the controller or personal data the storage of which is required by law.

Data subjects have the right to object to or restrict the processing of their personal data by the controller if the data subject considers this to violate the data protection law or occur without the authorisation to process certain personal data.

Data subjects have the right to receive the personal data submitted to the controller in a structured, commonly used and machine-readable format. Data subjects have the right to transfer these data to another controller if the legal basis of the processing of personal data is consent or an agreement and the data are processed automatically.

If the data subject is of the opinion that the controller has processed personal data on them in violation of the data protection law, the data subject has the right to lodge a complaint with the competent supervisory authority (Office of the Data Protection Ombudsman).

Data subjects may exercise the rights defined in this section in person at the controller's office or by sending a letter signed in person to the contact person specified in Section 1.

#### 8. Regular sources of information

The data stored in the registry are obtained from the customer communities and the data subjects themselves. Information may be added to the registry from sources permitting the disclosure of data.

# 9. Transfers of personal data to third parties and the processors of personal data

Kopiosto does not transfer personal data to third parties.

The controller may outsource the processing of personal data to a third party in part, in which case contractual agreements will ensure that the processing of personal data is performed appropriately and in compliance with the current data protection law. For example, a third party may be used in the implementation of direct marketing.

Furthermore, we have entered into agreements with certain service providers that contain clauses concerning the processing of personal data on behalf of Kopiosto. Such agreements are typically related to software development, maintenance, server and ICT support services, for instance.

## 10. Transfers of personal data outside the EU or EEA

The personal data are not transferred outside the EU or the European Economic Area.

# 11. Automated decision-making and profiling

We do not use the personal data for the purposes of automated decision-making or profiling.

## 12. Registry protection principles

The data stored in the registry are always processed confidentially and in compliance with the current data protection law.



Data stored in the registry in electronic format are stored in the controller's systems that are secured from unauthorised access by means of firewalls, access control systems and other technical measures. Access to the personal data in the registry is restricted to only those employees and administrators who require access due to their responsibilities. Access to the systems requires the user to at least enter a personal user ID and password. The employees of the controller are bound by a commitment to observe confidentiality concerning the personal data. The systems are located in locked premises within the European Economic Area that are inaccessible for unauthorised persons.

The manual materials to be processed are stored in a locked and guarded area.

#### 13. Amendments to the privacy statement

Kopiosto reserves the right to amend this privacy statement. All amendments are published on the Kopiosto website.