#### PRIVACY POLICY / DESCRIPTION OF PERSONAL DATA FILE



Stakeholder register

# 1. Controller

Cerion Solutions Oy Läntinen Rantakatu 53 A, 20100 Turku Tel. +358 2 230 1212

www.cerion.fi

Business ID: 2000757-6

# 2. Person responsible for the register

CEO Altti Raali, tel. +358 40 5573 047, altti.raali@cerion.fi.

# 3. Name of the register

Cerion Solutions Oy's stakeholder register.

# 4. Purpose of processing data

The data contained in the register are used for communication, sales and direct marketing purposes between organisations, taking into account the data subjects' positions and responsibilities in companies. The data are also used for managing contract-related matters and communicating with our partners.

# 5. Content

The register includes the following information:

# Organisation:

- organisation's name
- organisation's branch of activity
- organisation's address
- organisation's business ID
- organisation's telephone number
- organisation's web address
- organisation's role: Cerion Solutions Oy's customer / partner / collaborating organisation.

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#### Organisation's contact person:

- name
- telephone number
- address
- e-mail address
- title and area of responsibility
- information about orders and events.

#### 6. Data sources

Data are collected at Cerion Solutions Oy's customer, trade fair and marketing events as well as from companies' public websites, Cerion Solutions Oy's website and customer and supplier contracts.

# 7. Disclosure of data

Data are disclosed to partners for sales and marketing purposes. No data will be disclosed to operators outside the EU/EEA.

# 8. Protection of data

The register is protected by user identification, password and access rights. Access rights are managed according to user groups by the register's main users. The data cannot be accessed without the necessary access rights. Only the register's owner is authorised to request the granting or removal of access rights. The data that are subject to processing are located in the EU.

#### More information:

- https://products.office.com/fi-fi/business/office-365-trust-center-welcome
- https://support.valueframe.fi/aloitus/valueframe-ja-gdpr/

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# 9. Right of access to personal data

• The data subject has the right to access their personal data contained in the register. Written copies of the data will be provided upon request. Access to and copies of the data are free of charge, if at least one year has passed since the previous instance of providing the data subject with access to the data (Finnish Personal Data Act 523/1999, section 26). The right of access may only be denied for reasons set out in law. Access may be refused, for example, if providing access to the data would cause serious danger to the health or treatment of the data subject or to the rights of someone else. If access to the data is refused, the customer will be issued a written certificate to this effect and the customer may bring the matter to the attention of the Data Protection Ombudsman:

Office of the Data Protection Ombudsman, P.O. Box 315, 00181 Helsinki, Finland.

- The Ombudsman may order the controller to realise the customer's right of access (Personal Data Act 523/1999, section 27).
- A request to have access to one's data shall be made to the person responsible for the register by a personally signed or otherwise comparably verified document or by appearing personally on the controller's premises (Personal Data Act 523/1999, section 28).

Requests should be sent or delivered to:

Cerion Solutions Oy Läntinen Rantakatu 53 A, 20100 Turku, Finland

# 10. Right to rectification

- The controller shall, on its own initiative or at the data subject's request, without undue delay rectify, erase or supplement any unnecessary, incomplete or obsolete personal data contained in the register (Personal Data Act 523/1999, section 29).
- The data subject has the right to request the rectification of inaccurate data. For example, according to section 30 of the Personal Data Act, the data subject has the right to prohibit the processing of their personal data (e.g. for marketing purposes).
- If rectification is refused, the customer will be issued a written certificate to this effect and the customer may bring the matter to the attention of the Data Protection Ombudsman: Office of the Data Protection Ombudsman, P.O. Box 315, 00181 Helsinki, Finland. The Ombudsman may order the controller to rectify the inaccurate data. (See Personal Data Act 523/1999, section 29.)

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- Rectification requests shall be made in writing and addressed to the person responsible for the register. The request should specify in detail and justify the data that the data subject wishes to have rectified, the correct form in which the data should appear and the preferred method of rectification.
- Rectification requests should be sent to:

Cerion Solutions Oy Läntinen Rantakatu 53 A, 20100 Turku, Finland

# 11. Contact details for Cerion's data protection officer

tietosuoja@cerion.fi

# 12. Processing of personal data

Stakeholders' personal data are processed by persons authorised to access the sales and marketing support system.

# 13. Electronic systems in use

Sales and marketing support system, invoicing system, ERP system and intranet system.

#### 14. Manual material in use

None.

# 15. Storage period

The data will be stored for as long as necessary for the purposes of Cerion's business activities.