

# Privacy policy

Account of the processing of personal data in accordance with the EU General Data Protection Regulation (679/2016)

## Controller

Ruthon Group Oy  
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e-mail: asiakaspalvelu@ruthon.fi

## Contacts regarding data protection matters

For any questions related to the processing of personal data and in situations related to exercising their rights, the data subject must contact the controller in writing by sending an e-mail to the customer service at asiakaspalvelu@ruthon.fi.

## The basis for and the purpose of processing personal data

The legal basis for the processing of personal data is the controller's legitimate interest based on the legal bases for the processing of personal data, which are the following bases complying with the EU General Data Protection Regulation:

- (aa) the data subject has given consent to the processing of their personal data (GDPR Art. 6 1.a);
- (bb) 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 Art. 6 1.b);
- (cc) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (GDPR Art. 6 1.f).

The controller's legitimate interest mentioned above is based on a significant and appropriate relationship between the data subject and the controller that is created when the data subject downloads, installs and/or otherwise uses the controller's product or service or a product or service of the controller's client or service producer, and when the processing is carried out for purposes that the data subject may have reasonably expected at the time of the collection of the personal data and in connection with the appropriate relationship.

The purposes of processing personal data:

Personal data will be processed for purposes that are related to creating, taking care of and maintaining a client relationship between the controller and the data subject. In accordance with this, the personal data will be processed for marketing, selling and developing the products and services provided by the controller. The personal data will not be processed by means of automatic decision-making.

The controller will process the data itself and utilise subcontractors operating on the controller's behalf in the processing of personal data.

## **Regular sources of information**

The information entered into the personal data register will be obtained regularly from the data subject.

## **Items of personal data processed**

The controller will only collect data from the data subjects that is essential and necessary for the purposes described in this privacy policy. The data entered into the register will be collected from the client by e-mail, by telephone, via social media services, from agreements, from client meetings and from other situations in which the client discloses personal data, etc.

*The following items of data pertaining to the data subjects will be processed:*

Identifying and contact information, as well as specifying additional information such as the name, address, telephone number and e-mail address, of the clients and/or their representatives or other persons purchasing and/or using the controller's products and/or services.

## **Disclosure of personal data**

Personal data will not be disclosed to external parties unless such an obligation is set by law. In other words, data may be exceptionally disclosed to the authorities or other parties when required so by law.

If necessary, data in the register will be disclosed to other companies within the group in order to carry out procedures related to the provision and production of the controller's products and services, or due to similar common reasons.

## **Transfer of personal data to third countries**

Personal data will not be transferred outside the EU and the EEA.

## **Protection of personal data**

The controller will process personal data in a manner that aims to ensure appropriate personal data safety, including protection from unauthorised processing and accidental loss, destruction or damage.

The database containing personal data is on servers located in Kuopio, Finland, in a data centre administrated by Kuopion Ykköstilit Oy. The controller will take appropriate technical and organisational precautions in order to ensure the attainment of this goal, including the use of firewalls, encryption techniques and secure IT areas, appropriate access control, careful management of the user accounts of the information systems and the provision of instructions to the staff participating in the processing of personal data.

Based on the Employment Contracts Act (55/2001) and complementary non-disclosure agreements, all employees processing personal data are required to observe confidentiality regarding matters related to the processing of personal data.

## **Profiling**

Personal data will not be used for profiling or other automatic decision-making.

## **Data subject's rights**

### *The right to access the personal data*

The data subject has the right to obtain confirmation of whether their personal data is processed, and if so, the right to receive a copy of said personal data.

### *The right to have data corrected*

The data subject has the right to request corrections to any inaccurate or erroneous personal data pertaining to them. The data subject also has the right to have any incomplete personal data completed by submitting the necessary additional data.

### *The right to have data removed*

The data subject has the right to request that personal data pertaining to them be removed, if:

- a. the personal data is no longer needed for the purposes for which it was collected; or
- b. the personal data has been processed unlawfully.

### *The right to limit the processing*

The data subject has the right to limit the processing of personal data pertaining to them, if:

- a. the data subject denies the accuracy of their personal data;
- b. the processing is unlawful, and the data subject objects to the removal of their personal data and instead demands that its use be limited; or
- c. the controller no longer needs the personal data for the original purposes of the processing, but the data subject needs it in order to create, present or defend a legal claim.

### *The right to object*

The data subject has the right to object to the processing of their personal data at any time on a basis related to their personal situation.

The controller must thereby no longer process the data subject's personal data, unless the controller is able to show that there is a considerably important and justified reason that supersedes the data subject's interests, rights and liberties, or it is necessary for creating, presenting or defending a legal claim.

If the personal data is processed for direct marketing, the data subject has the right at any time to object to the processing of personal data pertaining to them for such marketing, including profiling when it relates to such direct marketing.

### *The right to transfer data from one system to another*

The data subject has the right to obtain the personal data pertaining to them and submitted by them in a structured, commonly used and machine-readable form, as well as the right to transfer the data in question to another controller.

*The right to file a complaint to the supervisory authority*

The national supervisory authority in personal data matters is the Office of the Data Protection Ombudsman operating in connection with the Ministry of Justice. You have the right to have your matter processed by the supervisory authority if you are of the opinion that the processing of personal data pertaining to you is in breach of the legislation pertaining to it.