25.05.2023

# PRIVACY POLICY

#### 1. DATA CONTROLLER

Resand Oy (Business ID 2557551-3) Pruukinraitti 8–12 31160 Nuutajärvi, Finland email: info@resand.eu

### 2. CONTACT PERSON IN MATTERS CONCERNING THE REGISTER

Veli-Jukka Leppänen, veli-jukka.leppanen@resand.eu, +358 44 554 8292

#### 3. NAME OF THE REGISTER

Customer, partner, and marketing register

#### 4. PURPOSE AND GROUNDS FOR PROCESSING PERSONAL DATA

The purpose of processing personal data is to enforce the rights and obligations related to a rental, service or other agreement between the data controller and the customer/partner, as well as to implement measures prior to the conclusion of the agreement and/or the realisation of the data controller's legitimate interests.

The register processes the personal data of contact persons working in companies or communities that act as the data controller's customers and partners. Personal data is used for sending the data controller's newsletters, event invitations and other marketing-related bulletins, for informing about services and events, for communicating with potential and current customers, and for managing, maintaining and developing customer/partner relationships.

### 5. PERSONAL DATA PROCESSED

The register processes the following data, among others:

- name and position of the person
- company/organisation and its web address
- contact information (phone number, email address, address)
- information related to the customer or cooperation relationship, such as information related to services subscribed and information in the contract
- billing and payment information
- information related to communication, such as correspondence with a contact person
- information related to sending event invitations
- information related to market research, such as information about the participant in the market research and the answers given

### 6. SOURCES OF INFORMATION

Data is collected from the data subject himself/herself, e.g., from an agreement with the data controller or orally or in writing when contacted. Data is also collected in connection with registration and participation in events or feedback/contact or later during the customer relationship or cooperation relationship. Personal data may also be collected and updated from the registers of partners and from authorities and companies providing services related to personal data.

# 7. DISCLOSURE OF DATA

The data controller does not regularly disclose data in the register to third parties. The data controller may disclose personal data within the limits permitted and required by law, for example to authorities.

The data controller may use external processors in the processing of the personal data referred to in this document and may disclose data for this purpose to its partners who process the data on behalf of the controller and in accordance with instructions. The data controller always ensures the appropriate processing of data and that the processors have implemented appropriate technical and organisational measures to ensure that the data is processed confidentially and at a sufficient level of data security. There is a personal data processing agreement between the data controller and the external processor.

Data will not be processed or transferred outside the European Union or the European Economic Area unless it is necessary for the technical implementation of data processing.

### 8. DATA PROCESSING

The personal data of data subjects will not be processed for purposes other than those for which the personal data in question was originally collected. In addition, the data controller strives to ensure that no unnecessary, outdated, or incorrect personal data is stored of data subjects in relation to the purposes of processing.

Personal data is stored for as long as it is necessary for processing the personal data. As a rule, data collected on a contractual basis can be stored for ten (10) years from the end of the contractual relationship.

Personal data may be stored in a third-party service selected by the data controller that has been found to be secure and complies with good data protection practices. The data controller and the third party in question ensure the confidentiality and data security of personal data and their processing.

Only those employees of the data controller and persons of authorised partners who have the right to process the data in this register on behalf of their work and/or duties are entitled to use the system containing personal data.

The data is collected in databases that are protected by firewalls, passwords, and other technical means. Physically, the databases are in locked and monitored facilities.

## 9. RIGHTS OF THE DATA SUBJECT

The data subject has the right to, in accordance with applicable data protection legislation and under the conditions laid down:

- be informed of the processing of their personal data
- check what information concerning them has been stored in the register
- request the rectification of incorrect or incomplete data
- request restriction of processing or erasure of their personal data
- object to the processing of their personal data
- prohibit the use of their data for direct marketing

Requests related to the exercise of the rights of the data subject must be sent in writing and signed to:

Resand Oy Pruukinraitti 8–12 31160 Nuutajärvi, Finland

If necessary, the data controller may request the data subject to specify their request in writing and verify the identity of the data subject before processing the request. The data controller may refuse to execute the request on the grounds laid down in data protection legislation.

The data subject has the right to lodge a complaint about the data controller's processing of personal data with the competent data protection supervisory authority.