

## PRIVACY POLICY AND REGISTERS

Date 17.2.2020

### 1. Controller

Almgren & Sankamo Ltd – Law Offices

Business-ID FI-3118762-2

Kirkkokatu 10 A, P.O. Box 188, 48101 Kotka, Finland

### 2 Contact Person for Register Queries

LL.M. Ville Mielonen

Telephone +358-5-2234 900

e-mail: [info@almgren-sankamo.fi](mailto:info@almgren-sankamo.fi)

### 3 Name of the Register

*Almgren & Sankamo and Perintäkarhut*, customer register

### 4 Purpose of Processing the Personal Data

The primary grounds for processing the personal data is the customer relationship between on Almgren & Sankamo and its customer, the customer's consent details, the customer's commission, or another relevant association.

In Customer register can also be stored other personal data which is directly linked to customer assignments, which may be customers opposite parties, co-operation partners and theirs lawyers and advisors.

Personal data can be processed for the following purposes: Managing customers assignments, implementing, and monitoring a customer relationship, and related communications and marketing.

### 5 Register's Data Content

Information stored on the data subject may include, for example, the following:

Name, education, employer, work status, identity code, customer number, language, address, telephone number, e-mail address, and other necessary contact information.

Information on the use and purchase of services and payments and notices. Information on the data subject's insurance (if any) and similar. Other information related to the customer relationship. Information necessary for the use of authentication and verification tools and services. Information on the processing of data, such as the storage date and the information source.

## **6 Storage Time of Personal Data**

Almgren & Sankamo stores personal data in the customer register until the customer relationship between the data subject and Almgren & Sankamo is considered to have ended. The ending time is determined from the last service contact or other contact of the data subject, which is then added 10 years. Legislation may require that some data is stored even longer.

## **7 Regular Sources of Information**

The data subject him/herself, and his or her customer relationship, use of services, communications and transactions related thereto. Parties offering services related to authentication, verification, address data, updates, credit information, or similar services.

Also information provided by Almgren & Sankamo's and Customers partners, such as insurance companies, can be added to the register.

## **8 Regular Disclosure or Transfer of Personal Data Outside the European Union or the European Economic Area**

Customer data will not be disclosed to parties other Almgren & Sankamo's employees, except when based on an agreement, separate consent given by the customer and/or explicit regulations.

Customer information shall not be transferred outside the European union or the European Economic Area.

## **9 Description of the Principles in Accordance with which the Data File Has Been Protected**

Any physical material is stored in a locked space to which only people with particular rights have access.

Digital material can only be accessed by employees specifically entitled to do with a personal user ID and password.

## **10 Profiling**

Almgren & Sankamo shall not make any profiling of the customer data.

## **11 The Data Subject's Right to Prohibit the Processing of Personal Data and Direct Marketing**

With regard to a personal special situation, a data subject has the right to prohibit his or her other processing activities which Almgren & Sankamo may direct on the data subject's personal data to the extent that the grounds for the processing of information is the customer relationship between Almgren & Sankamo and the data subject.

The data subject may present his or her request for the prohibition in accordance with Section 13 of this data protection description. In connection with the request, the data subject must identify the special situation on the basis of which he or she objects to the processing of data. Almgren & Sankamo may refuse to implement the request for prohibition on statutory grounds.

## **12 Other Rights of the Data Subject Regarding the Processing of Personal Data**

### **12.1 The Data Subject's Right of Access to the Data (Inspection Right)**

The data subject has the right to inspect Almgren & Sankamo's customer register with respect to the stored data concerning him or her. Such an inspection request must be made in accordance with Section 13 of this data protection description. The right to inspection may be declined on statutory grounds. In principal, there shall be no charge for exercising the right to inspect.

### **12.2 The Data Subject's Right to Demand Rectification or Erasing of Data or a Restriction on Processing Data**

The data subject or customer can request the rectification, erasing, or supplementing the erroneous, unnecessary, incomplete or obsolete personal data. The rectification request shall be made in accordance with Section 13 of this data protection description.

The data subject also has the right to demand the controller to restrict the processing of his or her personal data, for example, in a situation where the data subject is waiting for Almgren & Sankamo's response to his or her request to rectify or erase data.

### **12.3 A Data Subject's Right to Transfer Data From One System to Another**

Insofar as the data subject him/herself has provided information in the customer register for processing on the basis of the data subject's consent or commission, the data subject has the right to access such data mainly in machine-readable format and the right to transfer such data to another controller.

### **12.4 A Data Subject's Right to Make a Complaint to the Supervising Authorities**

A data subject has the right to make a complaint to the competent supervising authorities, if the controller in its operations has not followed the applicable data-protection regulations.

### **12.5 Other Rights**

If the personal data is being processed on the basis of the data subject's consent, the data subject has the right to cancel the consent by notifying Almgren & Sankamo of this in accordance with Section 13 of this data protection description.

## **13 Contacts**

In all matters related to the processing of personal data and all situations regarding the exercising of one's own rights, the data subject should contact Almgren & Sankamo by:

- by e-mail: [info@almgren-sankamo.fi](mailto:info@almgren-sankamo.fi)
- by post at the address: Almgren & Sankamo, PL 188, 48101 Kotka, Finland

Almgren & Sankamo can request the data subject to further define their request in writing, and, if needed, the identity of the data subject can be authenticated before initiating any other measures.