

Customer Register Description of Ilves Solutions Ltd and Ilves Valmisohjelmistot Ltd

The General Data Protection Regulation (EU) 2016/679 obligates the Data controller to clearly inform the registered subject. This statement fulfils this obligation.

1. Data controller

Ilves Solutions Ltd

Mailing address: Ruoholahdenkatu 8, 00180 Helsinki

Visiting address: Ruoholahdenkatu 8, 00180 Helsinki

Business ID: 2398203-5

Phone: +358 29 00 74 911

Ilves Valmisohjelmistot Ltd

Mailing address: Ruoholahdenkatu 8, 00180 Helsinki

Visiting address: Ruoholahdenkatu 8, 00180 Helsinki

Business ID: 2827842-6

Phone: 02900 74911

2. Contact person in matters relating to the register

Name: Anne-May Ingnatiew

E-mail: info@ilvessolutions.fi

3. Name of the register

Ilves Solutions Ltd's and Ilves Valmisohjelmistot Ltd's customer register.

4. Registered subjects

Subject to registration are clients and potential clients i.e. those party to co-operation negotiations.

5. Purpose of processing data

The purpose of the register:

- a. Personal data is processed on the basis of customer relations
- b. Personal data is processed based on consent

The processing of personal data and purpose of the register:

Personal data is processed only for these following predetermined purposes:

- c. Establishing, developing and maintaining customer relationships
- d. Marketing, sales, maintenance, implementation and invoicing of Ilves Solutions Ltd's products and services
- e. Sending customer letters, marketing messages and notices
- f. Opinion polls, marketing and other researches

- g. Developing products and services

6. Data content

Following information is included in the register:

- a. Enterprise data
 - o enterprise's name, business ID, business area, address, phone number, personnel classification, revenue classification, purchases and other business transactions with Ilves Solutions Ltd
- b. Personal data
 - o first and last name, enterprise, phone number, e-mail, position in enterprise, information received from the customer, information relating to the customer relationship, gender, and other information relating to the person's tasks and position in business world
- c. Marketing prohibition

7. Regular data sources

- a. Customer's own disclosure (phone, internet, e-mail or otherwise)
- b. Business and other transactions with customers and other related organizations
- c. Information recorded to the register by Ilves Solutions Ltds employees

8. Regular destinations of disclosed data

- a. Data from the register is not normally disclosed to third parties without the prior consent of the data subject.
- b. Ilves Solutions Ltd and other companies belonging to the same group of companies (Ilves Valmisohjelmistot Ltd) additionally have the right to use and disclose data from the register for founded purposes (such as direct advertising, distance selling and other direct marketing and opinion polls and market research) as stipulated in the Personal Data Act.

We have made sure that all of our service providers comply with data protection legislation. We use the following service providers on a regular basis:

- a. Edustustili / Online-tilitoimistot
- b. hubspot.com
- c. mailchimp.com
- d. Connection House Ltd / Lead Desk Ltd
- e. Equinix (Finland Oy)

9. Transferring data outside EU or EEA

- a. If and to the information data contained in the register is stored outside EU, this storage shall take place as stipulated in the EU-US Privacy Shield agreement.

10. Duration of processing

As a rule, personal data is processed for as long as there is an ongoing customer relation.

The registered subject can easily unsubscribe from our marketing messages through a link provided in every marketing message.

11. Handlers of personal data

The Controller and its employees handle personal data.

We may also outsource the handling of data to a third party, in which case we ensure that personal data is processed in accordance with data protection legislation and otherwise in an adequate manner.

The personal data in our customer register is handled by the employees of our accountant firm.

12. Data subject's rights

The subject has certain below mentioned rights. Requests shall be sent to info@ilvessolutions.fi, if not otherwise stated.

Right to access

The data subject has the right to access data concerning themselves, which has been stored to the register. Notices concerning the access right must be made in writing, signed and sent to the address set forth under Section 1.

Right to rectification

In case of errors in the registered data, data subject may submit a request to rectify the incorrect data to the contact person set forth under the Section 2.

Right to prohibit

The data subject has the right prohibit the data controller from processing personal data relating to the data subject for direct advertising, distance selling, other direct marketing, market research, opinion polls as well as public registers and genealogical research.

Right to be removed

The data subject has the right to ask for removal of registered data. After having processed the request, we either remove the data or inform the subject on what basis the data cannot be removed.

Withdrawal of consent

When it comes to processing of personal data based on consent, the subject has the right to withdraw consent for processing of such data at any point.

Right to limit the process

The data subject has the right to request that we limit the processing of controversial data until the matter has been settled.

Right to transfer

The data subject has the right to request that the subject's personal data is transferred to another system

Right to appeal to supervising authority

If the data subject has grounds for suspecting that we are in not complying with effective legislation regulating data protection, the subject has the right to make an appeal to the Data Protection Ombudsman. The Data Protection Ombudsman's contact information:

<https://tietosuojafi/en/office-of-the-data-protection-ombudsman>

13. Principles of securing the register

Manual content

There is no manual content.

Electronically stored data

Only those employees, who due to their positions have the right to process customer information, are authorized to use the customer register.

Each user has its own user identification and password. Access to the working space is monitored by access permits. Data is collected to databases, which are protected by firewalls, passwords and other technical measures. Data bases and their back-ups are located in locked facilities and only predefined persons have access to the data.

The register description is available at Ilves Solutions Ltd's customer service (reception), Ruoholahdenkatu 8, 00180 Helsinki, Finland and online at <https://ilveshaku.fi/about/fi/register/>.

This customer register description was last updated 24.5.2018.