

PRIVACY STATEMENT- CUSTOMER AND MARKETING REGISTER

The General Data Protection Regulation (GDPR) (EU) 2016/679

Drafted 21.05.2018

Amended 26.1.2022

This document is biannually reviewed and, as appropriate, amended and adopted by the Management Team. The reviewed document shall replace the outdated document, and subsequent to any change, the data subjects shall be notified.

1. Name of register

Customer and marketing register (Register for customers and representatives of potential customers)

2. Data controller

Name

Gaia Consulting Oy

Address

Bulevardi 6 A, 00120 Helsinki, Finland

e-mail address: info@gaia.fi

Switchboard tel.no. +358 (0)9 6866620

3. Point of contact in matters related to register

Name

Operations Manager Mia Wikgren

4. Purpose of personal information processing and basis for processing

Personal information is dealt when dealing with enabling business-to-business collaboration and sales. The juridical basis for processing for a customer is the need for making and fulfilling a contract. The juridical basis for processing for a potential customer is as mentioned above.

5. Data content of register

Personal information:

Name, e-mail address, phone number

Other information:

Position, title and role in the organization

6. Regular sources of data

Information is received from persons themselves as well as from public registers and data sources.

7. Recipients and recipient categories

Personal information is not disclosed to third parties. In case personal data is being transferred outside EU/EEA, appropriate measures will be taken to ensure protection of the personal data.

8. Personal information dealing platform

Webropol Oy, Visma Consulting Oy, Real Humap Software Oy

9. Principles for protecting the register

A. Access to register

Gaia's personnel has access to the register. Personnel is trained to use of the register and usage is followed through reviews.

B. Processing personal information

The contracts about appropriate processing of the data that are required by the regulation are made with the data processors, and the parties are responsible for following the contract in their operations.

C. Manual material

Any material to be retained manually is exceptional. Every employee with access to the material takes care of the data with precaution and makes sure that the data is not disclosed to third parties. Accordingly, when the data is it is not any more needed it will be erased.

D. Data processing in the operating system

The employees handling personal information are responsible for their own acts and operations according to the agreements and confidentiality obligations they have undertaken.

Employees having access to the operating system will follow Gaia's ICT safety policy when dealing with data. According to the ICT safety policy personal information is not dealt in public places or sites. Electronic data content of the register is not copied unless exceptionally and specifically determined. Electronic copies are stored appropriately and destroyed immediately when they are not needed.

10. Definition of retention period of personal information

Information is gathered when contracts are made and as part of Gaia's sales and marketing duty. Data is kept in the register as long as the client relationship exists, and erased once the client relationship no longer is valid. The data is also erased and no longer processed if the data subject has withdrawn his or her consent.

One of the register use cases is the sending of email newsletters. Newsletter is always sent so that it is possible to cancel the subscription to the newsletter. Cancelling of the subscription does not remove the person from the customer and marketing register.

11. Data subject's rights

11.1. Right to obtain access to the personal information

The data subject shall have the right to require a confirmation about whether his or her personal information is processed or not. If personal information is processed, the data subject has the right to obtain access to the personal information to acquire all other information written in this statement. The request to obtain the named access shall be done to the contact person of the data controller.

11.2. Right to require the rectification of data

The data subject shall have the right to require the data controller, without any undue delay, to rectify deficient or erroneous piece of information found in the register related to the data subject. Moreover, the data subject has the right to receive an extract of the personal information rectified and completed for example by receiving a supplement from the data controller.

The data subject has the right to acquire correction of his or her information in the register. Correction request shall be done to the contact person of the data controller.

11.3. Right to erase of data ("right to be forgotten")

If the data subject objects the processing of their personal information, the data is removed from the data content.

Under the above-named circumstances, the claim of the data subject to be erase their personal shall be submitted in written to the contact person of the data controller.

11.4. Right to restriction of processing

The data subject shall have the right to require the data controller to restrict the processing of their personal data for instance in the following circumstances is:

- a) data subject claims that their personal information is inaccurate. In this case the data processing of the personal data is restricted for a period during which the data controller can make sure the accuracy of the data.
- b) processing of data is against law and the data subject objects the erasure of personal data and instead claims restriction of data processing.
- c) data controller does not any more have need of the personal data in the original purpose, but the data subject needs the data to be claimed, presented or defended when lodging a complaint.

d) data subject has objected the processing of personal information against 21 Art. 1 awaiting the proof to verify if the justification of the data controller overrules the justified grounds of the data subject.

Under this circumstance the claim by the data subject to restrict data processing shall be submitted in written and with justification to the contact person of the data register.

11.5. Right to object to the processing of personal information

The data subject shall have the right, in connection with their personal specific circumstances, to object to processing measures of the data controller at the data subjects' personal information. The data controller may not extent the data processing unless the data processing can be proved to be based upon the data controller's legitimate ground and that there lies a significant, justified reason which overrules the interests, rights and exemption of the data subject or that the act is necessary for grounds stipulated under a juridical claim or defense.

Under this circumstance the claim by the data subject to restrict data processing shall be submitted in written and with justification to the contact person of the data register.

11.6. Right to data portability

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format, and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided when applicable according to the Art. 20 of GDPR.

12. Right to lodge a complaint with the supervisory authority

Every data subject has right to lodge a complaint with the supervisory authority. In Finland the complaint it to be submitted to the office of the Data protection Ombudsman.

Office of the Data Protection Ombudsman

PO Box 800

00521 Helsinki, Finland

E-mail: tietosuoja@om.fi

Switchboard: +358 (0) 29 56 66700

Fax: +358 (0) 29 56 66735

13. Risks related to the personal information with the data controller

The content of the register is not particularly vulnerable, and the register is not subject to significant risks considering current methods of handing registered data as well as the operating model.

As part of the design and development of operations, the idea of built-in security is implemented in the selection of systems and in the planning of the processing of registers.