

# Antti-Teollisuus Oy

## Customer Data Protection Statement

Updated 24 May 2018

### 1. General

Antti-Teollisuus Oy (Business ID 0207354-5, Koskentie 89, 25340 Kanunki, Finland) has undertaken to protect the personal data it processes and process such data in a careful and appropriate manner. We process personal data in compliance with data protection laws and with best practices regarding data management and processing, and ensure that customers' privacy is not compromised.

The processing of personal data helps us provide better services for you. We collect and use personal data in order to offer you our products and services and to develop new services. This allows us to better meet your needs. Data protection policies can be modified in line with changes in the services or the relevant legislation.

This data protection statement includes more detailed sections on

- the types of data collected about our customers and users of our online services
- the purpose of collecting such data
- how long such data is stored
- how the service makes use of cookies
- on the ways in which customers and users can influence the above processes
- who personal data can be shared with

We encourage you to familiarize yourself with the contents of this statement. By using our services, the user accepts the conditions specified in the data protection statement.

When processing the personal data of our customers, we comply with the basic principles contained in the Data Protection Regulation:

- personal data must be processed in a legal and appropriate way that is transparent in respect of the data subject ("legality, moderation and transparency")
- personal data must be collected for a specific purpose under the relevant legislation, and such data must not be processed later in a way incompatible with these purposes ("purpose limitation")
- personal data must be appropriate, relevant and limited to that which is necessary with respect to the purposes for which it is processed ("data minimization")
- personal data must be accurate and, when necessary, updated. All reasonable steps must be taken to ensure that personal data that is inaccurate and/or erroneous with regard to the purposes of the data processing is deleted or corrected without delay ("accuracy")
- personal data must be stored in a form that only allows the data subject to be identified as long as is necessary to fulfil the purposes of the data processing ("storage limitation")

## 2. For what purposes do we collect personal data?

We collect personal data so that we can offer you quality products and services as well as better customer service. Your personal data may be used in the development of our products, services, customer service as well as sales and marketing. Your personal data may be used to offer products and services, answer your requests and questions, carry out sales and purchase contracts, process orders, deliver products and complete other comparable actions.

We also use your personal data in communications with customers. We may, for example, send you newsletters and notifications of changes to our products and services. We may use your personal data in product and service marketing and market research with your permission or when this is otherwise permitted. We may additionally use your personal data to target our products and services to you, e.g. by recommending or displaying targeted content in our service.

Within the rules laid down by the relevant laws, we may also connect data collected in the context of a particular product and/or service with data collected in the context of another product and/or service.

We process data on the basis of the following principles laid down in data protection legislation:

- **Contract:** We process your data in order to fulfil the contract regarding a service or product that you have ordered
- **Consent:** We may process data you have provided or observed data on the basis of your consent or of a legitimate interest in order to e.g. carry out marketing actions. We may also request your consent if the purposes of the data processing change.
- **Legitimate interest:** We process your data in the context of providing and developing customer service, verifying customer transactions, operating services, business development, preventing and investigating misuse, and marketing. We see these applications as indispensable to our business and thus justified as legitimate interests.
- **Legal obligation:** We may be obligated to store some of your personal data in order to comply with legislation pertaining to accounting or other obligatory requirements. In this case the processing of your data is based on compliance with a legal obligation.

## 3. What data do we collect?

We only collect personal data identified as necessary for predetermined uses. The use determines the type of data to be collected in each given situation.

**Data provided by the user or personally identifiable data:** We collect data provided by users e.g. in order to deliver and invoice an order or service, manage and develop customer relations, as well as for marketing and opinion surveys. Without contact and billing information we are unable to deliver the product or service. We may also collect other data provided by the user in order to customize content and marketing to better align with the customer's preferences. Data provided by the user or other personally identifiable data includes:

- data that identifies an individual, such as his/her name,
- contact information, such as home address, phone number and email address
- login information required to use a digital account, such as username, screen name, password and other possibly identifiable information

- data pertaining to the customer relationship, such as billing and payment information, product and order information, customer feedback and communications, and cancellation information
- data provided by the customer regarding his/her profile and interests
- permissions and authorizations
- data pertaining to offer blocking
- data provided in the context of surveys and studies
- data required by law
- other data collected with the user's consent

**Data collected from the use of our services:** Using cookies and other comparable technologies, we automatically collect data that helps us understand how many users our services have, which content or advertising are popular and how long users spend looking at content or advertising. With this data we can develop our services and business, tailor content based on the probable interests of the user, target advertising and marketing communications, and prevent and investigate misuse. Such data includes

- data pertaining to the use and browsing of the service's features
- page from which the user came to our site
- model of the user's device
- individual device and/or cookie ID
- browser and browser version
- IP address
- length and time of session
- operating system
- other data collected with the user's consent

**Data derived from the use of services:** Based on analytics data and/or data provided by the user, we can draw conclusions about the user's possible interests and other such factors, and segment users into groups. We use this data for statistical and analytical purposes, developing our services and business, and customizing content, advertising and marketing messages.

In case data is used for any other purpose than those mentioned above, we shall ensure that data processing is compatible with the purpose for which the data was originally collected.

## 4. How do we collect personal data?

We primarily collect personal data directly from you, either orally or in writing. Your personal data is collected e.g. when you become a customer, when you buy or use our products, in the context of marketing campaigns or surveys, and during other interactions with us. You provide us with your data when requesting services, participating in surveys or campaigns or responding to questions in the context of the services we offer. Data may also be observed or derived from the use of our services. The data may be collected by us or by partners acting on our behalf.

In addition, we collect data from registers maintained by authorities, registers on credit data and customers' payment defaults and other trustworthy public or private registers such as the Business Information System (YTJ).

We may use cookies on our sites (small text files stored on the device) in order to ensure that our services function as well as possible.

## **Use of cookies:**

We use cookies to offer and develop our services. When you use our online services, they collect data including IP address, links clicked on, advertising and other content seen, site you are coming from and sites you visit, time of the browsing, type of application or browser, and other such data. Our sites and services may contain cookies of third parties.

We use session and persistent cookies. Session cookies only exist during a single session, and are automatically deleted when the user closes the browser. Persistent cookies exist for a predetermined amount of time, and remain on the computer after the session ends, unless the user deletes them before then.

Cookies do not damage your device or files.

Cookie settings can be changed for example in your browser's settings menu. More information on cookies can be found in the data protection documentation and instructions of each browser.

## **5. How do we process your personal data?**

We process your personal data in compliance with the Data Protection Regulation in a way that respects your rights and freedoms. We ensure that data protection principles are observed at all stages of data processing.

Your data will be processed only by the authorized personnel of Antti-Teollisuus Oy or its partners. Your personal data may be processed in a number of different information systems, which are administered by Antti-Teollisuus Oy or its partners.

We have valid Data Protection Regulation -compliant contracts with our partners. In accordance with these, we have been given sufficient guarantees from those processing personal data that this processing fulfils the requirements of the Data Protection Regulation.

## **6. How do we protect your personal data?**

As a rule, we do not share your personal information.

Antti-Teollisuus Oy may purchase certain personal data processing services from partners. We have only selected as partners data processors who apply best personal data processing practices with the help of the appropriate technical and organizational measures, meet the requirements of the Data Protection Regulation, and are capable of ensuring that your rights are observed.

Personal data may also be shared with the competent authorities or other actors as specified by the applicable legislation.

## **7. Do we disclose your personal data to parties outside the EU or the EEA?**

As a rule, we only process your data within the EU or EEA.

If, in exceptional circumstances, we move your data outside the EU or EEA, we ensure that the level of data protection is sufficient by, for example, stipulating that data confidentiality and processing complies with the relevant legislation, such as by using standard contractual clauses approved by the European Commission, and otherwise so that personal data processing is carried out in accordance with this data protection statement.

## **8. How long do we store your personal information?**

Storage times are based on relevant legislation and the company's data protection principles. We only store your data as long as is necessary in order to fulfil the purposes specified in this data protection statement, in compliance with the applicable legislation.

We store your data at least as long as you are a customer. Thereafter the storage time depends on the data in question and the purpose for which it is used (warranties, compensation, after-sales management). In order to comply with legislation pertaining to accounting or other obligatory matters, it is possible that we are obligated to store certain data also after the end of the customer relationship or other basis for the processing of personal data.

We aim to keep personal data in our possession up to date by deleting unnecessary information and updating out-of-date information.

## **10. Your rights**

You have the right to examine your personal data, require that inaccurate or incomplete information be corrected or that information which is unnecessary or outdated with regard to the purpose of the data processing be erased.

You also have the right to opt out of having your data used in direct marketing, market research and opinion surveys by contacting the controller of the register.

On the basis of the rights specified in the Data Protection Regulation, you have the right to be given a copy of your personal data. There is no specified format for such a request. If necessary, we may ask you for additional information in order to verify your identity. Such requests can, as a rule, be made free of charge.

The register controller shall respond to the customer within the timeframe specified in the EU Data Protection Regulation (usually within one month).

The Data Protection Regulation guarantees, with certain exceptions, data subjects the right of rectification and erasure (the so-called 'right to be forgotten') of their data.

You also have the right to revoke consent given at an earlier date, on which the data processing has been based.

If the data that is to be rectified or erased is controlled by one of our partners, we shall request that they take the steps detailed above.

In accordance with the Data Protection Regulation, you have the right to transfer your data from one system to another. In practice, you have the right to receive your personal data in a commonly used transmission format and transfer it to another register controller. The law requires that processing be based on consent or a contract, and that the processing take place automatically.

On the basis of a specific personal situation, you have the right, at any time, to oppose the processing of your personal data. This right does not extend to public sector registers, whose maintenance is based in law.

You have the right to not be subject to a decision that is based solely on automatic processing, such as profiling, and that has legal effects on you or affects you in a comparably significant way.

We are obligated to personally inform data subjects of data security violations by which they are affected. This obligation is applicable if the violation in question is likely to present a significant risk with regard to the individual's rights or freedoms, such as in the form of identity theft, payment fraud or other criminal activity.

## **11. Contact information**

Should you have any questions regarding our data protection practices or personal data processing, or if you would like to exercise the rights detailed under heading 10, please contact us at the following address: [antti@antti-teollisuus.fi](mailto:antti@antti-teollisuus.fi).