

## 1 INTRODUCTION

This privacy policy aims that you as a consumer or contact at a corporate customer shall be provided with information about how ENKOM ACTIVE OY (“**the Company**”) handles your personal data, and that you should feel reassured that the processing will occur in accordance with the General Data Protection Regulation and other applicable personal data legislation. The privacy policy also describes your rights in relation to us and how you can exercise your rights.

## 2 WHO IS THE CONTROLLER?

The Company is the controller for the processing of the personal data collected from contacts at corporate customers that buy products.

You will find the Company’s contact details below.

ENKOM ACTIVE OY, FI01831252

UPSEERINKATU 1, FI-02600 ESPOO, FINLAND

+358 10 204 0000

In connection with questions about the Company’s processing of your personal data, please contact Sari Heikkinen at [info@enkom-active.fi](mailto:info@enkom-active.fi).

## 3 TYPES OF PERSONAL DATA THAT ARE BEING PROCESSED

The Company processes the following information about you as a contact at a corporate customer or private business owner:

- Name
- Company
- Delivery Address (not mandatory)
- Phone Number (not mandatory)
- E-mail address

## 4 WHAT DOES THE COMPANY USE YOUR DATA FOR?

### *Customer administration*

Your personal data are processed so that the Company is able to administer your orders (or those of the company you represent) and handle any returns, warranty claims and similar customer administration. The legal ground is that the processing is necessary for the Company to be able to fulfill the agreement with you as a consumer or private business owner. If you are a contact at a client company, the processing is carried on with a balancing of interests as a legal ground, where the Company’s legitimate interest is to be able to exercise its rights and obligations under the agreement with the client company.

### *Direct marketing*

The Company also processes your e-mail address for marketing and product information purposes. Newsletters and marketing e-mails are sent only on the condition that you have not opposed such marketing, and you may choose to unsubscribe at any time from our newsletters and marketing e-mails. In order to unsubscribe, please contact the Company at [info@enkom-active.fi](mailto:info@enkom-active.fi) or use the

unsubscribe link provided in each newsletter/e-mail. The marketing occurs based on a so-called balancing of interests as a legal ground, where the Company's legitimate interest is to market its products.

## **5 WHICH RECIPIENTS ARE WE GOING TO SHARE YOUR DATA WITH?**

The Company may transfer your personal data to delivery companies and system suppliers. These recipients only have the right to process your personal data on behalf of the Company in connection with performing a service for the Company, e.g. delivering ordered goods to you or sending marketing/newsletters. The Company takes all reasonable legal, technical and organisational measures in order to ensure that your data is handled securely and with an adequate level of protection during transfer to or sharing with such selected third parties.

The Company can also provide your personal data to public authorities e.g. the Finnish Tax Agency, if we are obliged to do so by law. In the case that all or parts of the Company's operations are sold, the Company can transfer your personal data to a potential buyer of the operations.

## **6 TRANSFER OF PERSONAL DATA OUTSIDE THE EU/EEA**

Your personal data will only be processed in the EU/EEA with the exception of email direct marketing system (email addresses only). Email marketing system provider is compliant with the General Data Protection Regulation (GDPR).

## **7 HOW LONG WILL WE SAVE YOUR DATA FOR?**

Your personal information is processed for as long as it is necessary for the Company to administer the purchase and any return of the goods. In the case where there is a warranty period on the purchase, your contact details and purchasing history will be saved during the warranty period so that the Company will be able to fulfill any warranty commitments.

Provided you have not opposed the receipt of newsletters and marketing e-mails, or request your data to be deleted we will use reasonable efforts to assure that incorrect and outdated personal data is deleted or corrected without undue delay.

In the event that the Company becomes aware that your employment at a client company is ending or you cease to be the corporate customer's contact for some other reason, we will remove your data.

The Company can save your personal data for a longer period if it is necessary to meet a legal obligation that needs to be processed by applicable law, or in order for the Company to be able to establish, exercise or defend legal claims, for example related to the Company's contractual relationship with the client company.

## **8 YOUR RIGHTS**

You have certain statutory rights that you can exercise in relation to the Company. A summary of these rights follows below. For complete information about your rights, please see the General Data Protection Regulation, Chapters 3–5.

- **Right to access/extract from register.** You have the right to get answers about whether the Company processes personal data about you. If this is the case, you have the right to information about, among other things, what personal data are being processed, the purpose of the processing, which external recipients receive your personal data and how long we will save your personal data for.
- **Right to data portability.** You have the right to request a copy of the personal data, which you have provided to the Company, in a structured, commonly used and machine-readable

format. You also have the right to request that the Company transfer these personal data to another controller. The right to data portability applies to personal data, which is processed in an automated manner, and which is based on your consent or on an agreement you are party to.

- **Rectification of inaccurate data.** You have the right to request that the Company rectify inaccurate or incomplete information about you.
- **Erasure of certain data.** You have the right to request that the Company erase your personal data under certain circumstances, e.g. if the personal data are no longer necessary for the purpose that we collected the personal data for.
- **Right to object to the Company's processing of personal data.** You have the right under certain circumstances to object to the Company's processing of your personal data.
- **Right to object to direct marketing.** You have the right to object at any time to the Company processing your personal data for direct marketing. If you object to such processing, the Company without delay shall cease all direct marketing to you.
- **Right to restriction of processing your personal data.** You have the right to request a restriction of the Company's processing of your personal data in certain cases. For example, if you have contested the accuracy of your personal data, you can request a restriction of the processing during a period of time to enable the Company to verify the accuracy of the personal data.
- **Complaints.** If you have a complaint about the Company's processing of your personal data, you have the right to lodge such a complaint with the Finnish Data Protection Authority.

If you want to make a request for an extract from the register, data portability, rectification, erasure, objection or restriction, please contact the Company at [info@enkom-active.fi](mailto:info@enkom-active.fi)

## 9 CHANGES TO THE PRIVACY POLICY

The Company reserves the right to make changes to this privacy policy. If such changes are made, notification of this will be provided via website.

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