

# PRIVACY POLICY

## Description of file and privacy policy in accordance with Section 10 of the Personal Data Act (523/1999) and the EU's General Data Protection Regulation (GDPR)

### Data controller

Name: Lingsom Oy

Address: Aarnintie 5 B 13, 95420 Tornio, Finland

### Contact person in matters relating to the file

Cyrus Jebraeil, [lingsom@lingsom.com](mailto:lingsom@lingsom.com)

### Name of register

Customer file

### Updated

28.8.2019

### Purpose of processing of personal data

The legal basis under the EU's General Data Protection Regulation for the processing of personal data is the legitimate interest of the data controller (customer relationship).

With regard to customers, the purpose for the processing of personal data is to fulfil orders, manage customer relationships, obtain statistics, carry out opinion surveys (such as customer satisfaction surveys etc.), as well as to carry out tasks related to sales, marketing, invoicing, and the development of services.

### Data content of file on customers and their staff

Data subject's name, email address, telephone number, invoicing address, organisation, detailed order data provided by the data subject, and all other data entered into the system by the data subject him/herself.

### Regular sources of data

Data sources include customer relationships and agreements, the appendices thereof, and tendering documents.

### Confidentiality

All staff of Lingsom Oy and the ERP system's administrator are bound by a written non-disclosure agreement. All data are processed confidentially.

### Transfer of data outside the EU or EEA

The server of the ERP system of Lingsom Oy is located in the EU/EEA. All data in the system are transmitted via an encrypted secure connection.

Lingsom Oy also uses a cloud service to store personal data, the server for which is located outside the EU/EEA. The server meets the requirements of the GDPR (Privacy Shield).

### Data storage

Essential data are stored for a maximum of 10 years following the termination of a customer relationship. However, customers' contact details may be kept for a longer period for marketing purposes, provided that the person has not prohibited direct marketing.

### File protection principles

Care is exercised in data processing, and data processed using information systems are duly protected.

Due care is paid to the physical and digital data security of hardware.

Stored data are treated confidentially and processed only by employees with relevant authorisation.

### A. Manual material

Agreements, the appendices thereof, and tendering documents.

## **B. Electronically processed data**

The administrator of the ERP system has access to the system, and the administrator is also bound by a written non-disclosure agreement.

The personal data of customers or their staff are not transferred outside the ERP system.

All passwords in the ERP system are encrypted and are not stored anywhere in an unencrypted form.

### **Data subjects' rights**

Data subjects (customers or their staff) can see their data directly in the ERP system.

System users can independently amend data on them, such as contact details. Data subjects are entitled to request rectification of data on them.

Data subjects are entitled to prohibit the data controller from processing data on them for the purposes of direct marketing, distance sales and other direct marketing as well as market and opinion surveys. Requests may be made by email to [lingsom@lingsom.com](mailto:lingsom@lingsom.com).