



# PRIVACY POLICY

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# PRIVACY POLICY

Our company Niini & Co Oy (hereinafter Niini) and the associated company Koopia Niini & Rauam OÜ store and process personal data according to the requirements of the General Data Protection Regulation of the EU. The content of this privacy policy may be amended by publishing an updated version online. Thus, we recommend that you refer to our privacy policy at regular intervals.

Controller:

Niini & Co Oy

0199332-3

Höyläämötie 2 (main office), Helsinki, Finland

Tel. +358 (0)10 6803 000

Person in charge of matters concerning the register:

Quality Manager and Data Protection Officer Heikki Juvonen

email: [heikki.juvonen@niini.fi](mailto:heikki.juvonen@niini.fi)

Niini is committed to compliance with the Finnish Personal Data Act and its regulations and to maintaining the security of your personal data. This privacy policy describes how Niini collects, uses, stores, and protect your personal data as you use the services provided by Niini. By referring to You in the privacy policy, we mean the clients of Niini, either potential or existing, associated partners, employees or other similar parties, such as beneficiaries or other responsible persons.

This privacy policy covers all registers included in the scope of the Finnish Data Protection Act that include information that contains personal data. The personal data is processed within a register related to the management of customer relationships (customer register), a register created within marketing and other similar activities (marketing register), a supplier register consisting of sub-contractors, and a personnel register (employee register as a sub-register), which in turn is used to manage aspects related to the employees of the company, such as payroll etc.

Sections of the privacy policy:

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# 1

## What personal data regarding you is collected by Niini and what purposes is the data used for?

While processing and registering personal data, Niini operates according to the requirements of the Finnish Personal Data Act. Use of the online services provided by Niini is only possible by registering as a user of the service. By registering as a user of an online service, the personal data provided by the user is stored into the customer register of Niini. The collection of personal data is performed with the consent of the data subject using various methods. These methods can include, for example, requests for quotation, various surveys, studies, competitions, visiting a website and accepting cookies. Niini does not collect or process sensitive data referred to in the Personal Data Act. You can prevent the use and/or disclosure of your personal data at any time by notifying the Data Protection Officer of Niini at [rekisteriseloste@niini.fi](mailto:rekisteriseloste@niini.fi). However, certain information must be stored legally under the laws that have laid them down, such as the Accounting Act. More information regarding the right of verification is included in section 4. Register descriptions and the right of verification.

We process personal data for the purposes of managing customer relationships or relationships based on other relevant connections, analysis, statistics, producing and developing services/products, and marketing. For example, a relevant connection may refer to identifying customers in an online service, providing individually specified services or processing related to the management of service operations.

Our operation is based on legitimate business thus we also comply with EU legislation regarding the storage of personal data:

- With regard to processing, the personal data stored by us is legal, reasonable and transparent. This means that it is possible to access Your data at any time. Section 4 includes information regarding the register descriptions and how You can verify data in practice.
- Data is limited by purpose – for example, the personal data we collect are only used for certain purposes. We do not disclose your information to third parties, unless there is a proper reason to do so. A proper reason could, for example, be a mailing list provided to a sub-contractor for product delivery. The sub-contractor belongs to the cooperation network of Niini and dedicated contracts have been concluded with these parties regarding personal data, which include, among other things, stipulations for the destruction of registers or the use of the register on a wider level.
- We minimize the stored data – we only store data that is necessary and required for use.
- We attempt to maintain the accuracy of our data and update our

register as often as possible and whenever requested by the customer.

- We limit the storage of data – all data have a specified lifespan, after which they are deleted either automatically or routinely, unless there is a legal basis for continued storage.

- We store complete and reliable data, secured with back-up copies, for example.

### The data content of the customer and marketing registers

Our customer and marketing registers primarily contain the following data:

- First name
- Last name
- Title/Screen name (used in online services)
- Name of the company
- Contact information, such as street address, postal address, city, country, telephone number, email address
- Other textual information related to customership
- Information related to work orders
- Creditworthiness information
- Invoicing-related information, such as invoicing terms and amounts
- Marketing authorization or prohibition
- Information regarding decision-makers
- Classification related to the customership management model
- Invoicing information
- Information collected through cookies
- Information collected from social media channels

With respect to customer relationships, we store at least minimum information that typically comprises the identified name of the person, possible company, and contact information, such as email address and telephone number. Personal data may be purchased and utilized from external customer registers under the Personal

Data Act and using double-opt-in. Within the double-opt-in procedure, the sending of marketing messages received electronically is always based on advance consent. In addition, the registers may be updated from the population register, credit reference register, and other similar public and private registers.

In addition, we maintain a supplier register for sub-contractors and partners to ensure smooth cooperation.

### The data content of the supplier registers

Our supplier registers primarily contain the following data:

- First name
- Last name
- Title/Screen name (used in online services)
- Name of the company
- Contact information, such as street address, postal address, city, country, telephone number, email address
- Information related to work orders
- Invoicing-related information, such as invoicing terms and amounts
- Invoicing information

In addition, the personal data of personnel is processed within two registers, a personnel register and an employee register. The data content of these registers is listed below.

The data content of the personnel and employee registers

- First name
- Last name
- Personal identity code
- Address
- National tax number
- Bank account number
- Emergency contact (ICE)

The personal register data is considered confidential corporate information and can only be accessed by a very limited group of specifically assigned staff members.

## Accessing customer support

Our customer support is available to You during customer service hours via email, telephone or through the chat service on our website. When you access customer support, we may process the following personal data:

- First name
- Last name
- Contact information
- IP address
- Actual communication between You and our customer support
- Other possible information you may have provided during your contact

## Website and cookies

Niini uses cookies to monitor the use of the content of Niini's online services and facilitate and expedite the use of the services. Cookies are short text files, which are stored by a network server on the user's hard drive. The cookies are used to gauge and monitor the use of online services to develop services for the online environment and to ensure a positive user experience in the future. The user receives a notification of the cookies when they access Niini's website. The user may reject cookies by modifying the settings of their browser. If the user decides to block cookies, they may not be able to fully utilize the online services provided by Niini.

### The use of analytics in Niini's online services

Niini uses the Google Analytics (GA) software, Crazy Egg, and Fonecta Audience Insights service on its websites. The GA network analytics software is used to analyze the use of online services to develop and improve usability. The analytics tool is used to collect data on which pages are accessed by the users, what type of information interests the users, and what functions related to the online service are used, among other things. The information collected using GA is analyzed and utilized for the purposes of development and marketing of Niini's services. The collection of personal data within an online service using the Google Analytics tool can be prevented by downloading and installing a browser add-on at <https://tools.google.com/dlpage/gaoptout>.

The Fonecta Audience Insights service gauges and analyses the vis-

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itor profiles of a website. The service creates a general anonymized report of the visitor profiles, which can be used to plan marketing and improve targeting. Fonecta collects data on and analyzes the customer's use of the website according to the cookie policy of Fonecta. The cookie policy for Fonecta's services can be found at: <https://www.fonecta.fi/info/hyodyllista-tietoa/tietoa-evasteista/>.

The Crazy Egg service analyzes website access by drawing heat-maps, which can be used to improve the users' online experience, see <https://www.crazyegg.com/cookies>.

### Basis for maintaining the register

The storing of information in the register is based on a contractual relationship with our company, consent received from a person for storing information or a legitimate interest of our company to collect information in consideration of a business condition. We collect and store information on potential new customers based on customer relationships or in relation to business operations. The collection of information on new potential customers is based on enterprise activities and we collect said information ourselves or through carefully selected partners. Contracts regarding the security and use of personal data have been concluded with these partners.

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### Register descriptions and the right of verification

The register descriptions under the Personal Data Act are available for each customer register/service in Niini's customer service at Höyläämötie 2, Helsinki, Finland.

User may exercise their right of verification under the Personal Data Act by delivering a written and signed verification request to the person in charge of register-related matters at Niini, using the following address: Niini & Co Oy, Person in charge of matters concerning the register, Höyläämötie 2, FI-00380 Helsinki, Finland. We will verify Your identity using an official identity document to ensure that the correct personal data is verified. The report itself will be made available at the same office at a time agreed upon in advance.

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## Sources of data

Niini uses a customer management system for the customer register and various distribution and marketing platform systems to produce various marketing measures and to perform and monitor/analyze the measures. In online services, various systems are utilized to ensure the best possible user experience and develop/produce new services. The data sources are published on the website under section 4. systems related to cookie information. At the operational level, for example during solicitation, we may also use names picked from the media, for example, to make contact for business purposes.

The different registers can only be accessed by Niini personnel whose duties the register in question is related to. Access is restricted/permitted to the content of user IDs.

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## Duration of personal data processing

Personal data is primarily processed for as long as the customer-ship is effective and/or if the customer does not terminate the customer relationship. In addition, internal destruction policies have been created for mailing and other similar lists created in the context of customer management and various processes, depending on the stored information and its use as well as the specific needs of Niini's customers. The information is only stored for as long as necessary. In addition, data subjects can remove themselves from our marketing register using the link included in each marketing email sent by us.

The personal data related to recruitment, employment contracts, duty rosters, annual holiday records, document related to absence, payroll documents, health information, annual reports, and personnel matters are stored as prescribed by law.

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## Parties processing personal data

Personal data is processed by the controller and its employees. We may also outsource the processing of personal data partly to a third party, in which case we will use contractual arrangements to ensure that personal data is processed according to currently effective data protection legislation and otherwise in an appropriate manner.

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## Disclosure and transfer of data

At the discretion of the controller, data may be disclosed to our partners as permitted and required by currently effective legislation, unless the data subject has prohibited the disclosure of their data.

The partners used by Niini are selected using an auditing process, which maps all factors that impact the effectiveness of the cooperation, reciprocity, and loyalty. The performance and eligibility of sub-contractors is evaluated regularly according to the specifications of the ISO9001 standard. Information is only disclosed to partners for purposes that support the operational concept of the register.

To a limited extent, we also disclose personal data to other parties. In practice, this means the following:

- With a customer's order, we provide mailing lists and other information related to the order that is essential for the fulfillment of the order and/or delivery.
- Customer information that is required to ensure customer communication within the development cooperation and system development of our partners may be combined and shared between the parties when necessary.

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## Transfer of data outside EU or EEA

Data is generally not disclosed to parties operating outside the European Union or the European Economic Area. To a limited extent, data may be disclosed to services that operate outside the European Union or the European Economic Area. The transfer of data is carried out in compliance with the requirements of personal data legislation and the data is shared with these services according to the principles of data minimization and risk reduction.

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## Register protection

Niini uses the necessary technical and organizational data security methods to protect personal data against unauthorized access, disclosure, destruction or any other unauthorized use. These methods include the use of firewalls, encryption techniques, secure IT areas, appropriate access control, controlled granting of access rights and monitoring of their use, the use of encryption techniques, instructing the personnel participating in the processing of personal data, and careful selection of sub-contractors. Manually main-

tained materials are located in facilities that cannot be accessed by unauthorized persons. Only specific employees of the controller and of companies acting in its name or on its behalf have access to the data included in the register. Each personal data processing transaction is recorded into a log, which can be used to verify who accessed the personal data and when.

The information systems of Niini are managed by Niini & Co Oy's dedicated IT management. The information systems are secured both physically and using software. System administrator access is only allowed to authorized persons, each of whom has a specific role and accordingly restricted rights. Only authorized persons are allowed to access the system facilities. All business-critical electronic systems are backed up daily and/or using continuous data protection. Physical equipment is duplicated as far as possible. Servers and services may be restarted in an identical environment immediately or after a brief outage if necessary. The most important devices are connected to a UPS device, providing uninterruptible power supply. The development and maintenance of Niini's information systems uses the recommendations of the ISO/IEC 17799:2005 standard where applicable.