

1. **Data Controller** Hepacon Oy (Business ID: 0787141-5),
Malminkaari 23 A, FI-00700 Helsinki, Finland
Tel. +358 9 351721
2. **Contact Person** ICT Manager Jouko Väätäinen, tel. +358 9 35172640,
gsm +358 40 1828002, jouko.vaatainen@hepacon.fi .
Hepacon Oy is not responsible for or appointed a separate Data
Protection Officer.
3. **The legal basis and purpose of processing personal data**
The legitimate interest of Hepacon Oy on the basis of a customer or partnership relationship or other relevant connection with the business or implementation of the contract.

The purpose of processing personal data is
 - delivering and developing our technical building design and consulting services
 - fulfill our contractual and other promises and obligations
 - managing and developing our customer relationship
 - arranging our events
 - marketing our services
4. **Registered personal data**
In connection with the Customer Register, we will process the following personal information of a customer, partner or other registered person such as trainee:
 - *basic information* such as name, date of birth, customer number, username and/or other unique identifier, password, gender, native language
 - *contact information* such as email address, phone number, address information
 - *company and corporate contact information*, such as business ID and contact names, and contact information
 - *possible direct marketing bans and consents*
 - *event participant details and event related information* such as food limitations
 - *customer relationship and contract information* such as past and current contracts, orders, offers, other business information
5. **Regular data sources**
Registered yourself, sales offer list, contracts/orders, sub-consultant list, project management system, population register, authorities, credit bureaus, contact information service providers and other similar trusted entities.

In addition, personal data may be collected and updated for the purposes described in this Privacy Statement also from publicly available sources and from information received from authorities or other third parties on the basis of applicable law. Such updating of data is performed manually or by automatic means.
6. **Ordinary transfers and transfers of information**
We will not disclose or transfer the information of the Registry to third parties.
7. **Transfer of data outside the EU/EEA**
We will not pass personal data outside the EU/EEA area.

8. **General principles for protecting and storing register information**

Personal data files and databases are protected against unauthorized access. Security is based on user management, technical protection of databases and servers, physical protection of premises, physical access control, communication protection and data backup. Use of the personal data system is only valid for those employees who are entitled to process personal data on their behalf. Databases and backups are located in locked spaces and only certain pre-designated persons can access the data. Device facilities are physically located in Finland, and files EU/EEA area.

Manual data is stored in lockable rooms in lockable cabinets.

We will keep personal information as long as it is necessary for the purpose of personal data such as the law, the contract, the existence of a customer relationship or any other requirement of necessity. We update the customer register as we get the changed information and check it out all annually.

We evaluate the need for data retention and/or archiving, taking into account regular legislation. In addition, we will take reasonable measures to ensure that the data subject does not keep the personal data incompatible, obsolete or incorrect for the purposes of the processing. We will rectify or discard such information without delay.

9. **Registered inspection rights**

The data subject has the right to inspect the data stored on the personal data of himself and to claim for rectification or deletion of incorrect information if it is legitimate. The registrar is also entitled to withdraw or amend his/her consent.

In accordance with the General Data Protection Regulation (since 25.5.2018), the registrar has the right to object or request restriction of its processing and to file a complaint against the processing of personal data to the supervisory authorities.

For special personal reasons, a registered person is also entitled to object to profiling and processing when the processing is based on the relationship between us. In the context of his claim, the data subject must identify the particular situation on which the registered opposition to the processing is based. Hepacon Oy may refuse to apply for objection only on the basis of the law.

All contacts and requests concerning this privacy policy must be made in writing to the contact person.

10. **Changes to our Privacy Policy**

If Hepacon Oy changes this privacy policy, we make changes to the displayed policy on dates. If the changes are significant, we can also inform you of these in some other way, such as by email or by posting a notice to our site. We recommend that you regularly use our website and take note of any changes we may make in the policy.



Approved by Hepacon Oy's Management Group on April 12, 2021.
Regular review and update annually.