

MONIDOR Oy (Ltd) Privacy statement

1. **Register administrator:**

Monidor Oy
Elektroniikkatie 3
90590 Oulu
Finland
VAT ID: FI26807531

2. **Person in charge of the register**

Mikko Savola, CEO
mikko.savola@monidor.com
+358 50 37 88890

2. **Name of the register:**

Monidor Ltd's customer register

3. **Purpose of use of the register:**

The personal data collected is used for the following purposes:

- marketing of Monidor's products and services. Direct marketing and newsletters based on your consent and in other situations allowed by law
- collecting customer feedback in order to develop of Monidor's products and services
- invoicing and customer contact information purposes

4. **Content of the register:**

Monidor Ltd's customer register may contain the following information:

- your first name and last name
- your company or other organization and address of the company or other organization
- your position in your organization
- your telephone number
- your e-mail address
- your feedback to Monidor Ltd or your responses to customer surveys or competitions
- order and invoicing history

5. **Regular sources of personal data:**

- enquiry from you
- when you contact Monidor Ltd's customer service
- data from Monidor Ltd's distributor network
- data through contact and other forms and when you give answers to customer surveys and competitions

6. Transfers of data:

Personal data is transferred to following third parties for the following purposes:

- to Monidor Ltd's distributor network
- third parties who process personal data on behalf of Monidor Ltd, such as companies who perform direct marketing services on Monidor Ltd's behalf, IT services, customer delivery services providers and account services providers.

7. Transfer to countries outside EEA

Monidor Ltd does not transfer your personal data to countries outside the European Economic Area (EEA) and European Union (EU)

8. Methods how register is secured

The personal data is secured by using the following methods and principles:

- locks at Monidor Ltd's and its subcontractors' premises;
- firewall, anti-malware and spam filtering systems of Monidor Ltd's and its subcontractors' communication networks and other software and hardware that protect the security of communication networks;
- professional knowledge of Monidor Ltd's personnel;
- training of Monidor Ltd's personnel;
- the content of the register is in electronic form except for temporary special occasions; and
- Monidor Ltd's policies and guidelines relating to personal data matters.

9. Right to access

After having supplied sufficient search criteria, you have the right to get information on which data on you is being processed or information that no such data is being processed. Where such personal data are being processed, Monidor Ltd shall provide the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data are to be or have been disclosed
- the period for which the personal data will be stored;
- the existence of the right to request from Monidor Ltd rectification or erasure of your personal data or to object to the processing of such personal data;
- the right to lodge a complaint to the supervisory authority and the contact details of the supervisory authority;
- communication of the personal data undergoing processing and of any available information as to their source;
- the significance and envisaged consequences of such processing, at least in the case of measures which produce legal effects concerning you or significantly affects you and which are based solely on automated processing intended to evaluate certain personal aspects relating to you or to analyze or predict in particular your performance at work, economic situation, location, health, personal preferences, reliability or behavior; and
- information on the regular sources of personal data.
- where you make the request in electronic form, the information shall be provided in electronic form, unless otherwise requested by you.

- Monidor Ltd shall provide a copy of your personal data undergoing processing. For any further copies requested by you, Monidor Ltd may charge a reasonable fee based on administrative costs.
- where requests from you are manifestly unfounded or excessive, in particular because of their repetitive character, Monidor Ltd may either: (a) charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or (b) refuse to act on the request.
- if you want to inspect the data concerning yourself as mentioned herein, you must represent the request to Monidor Ltd in a document hand signed by you or in a document certified in a similar manner or personally by visiting Monidor Ltd.

10. Rectification, period for which personal data will be stored and right to lodge complaint to supervisory authority

- Monidor Ltd shall, at your request, without undue delay correct, erase or supplement personal data contained in its personal data register if the data is erroneous, unnecessary, incomplete or obsolete as regards the purpose of the processing, including by way of supplementing a corrective statement.
- if Monidor Ltd refuses your request of the correction of the data, Monidor Ltd will give you a written certificate regarding this. The certificate will also include the reasons for the refusal. In such event, you may bring the matter to be handled by the Data Protection Ombudsman.
- the personal data will be stored during the time period for which is necessary in relation to the purposes for which they are processed.
- You have the right to lodge a complaint to the supervisory authority. The contact details of the supervisory authority:

<http://www.tietosuoja.fi/en/index/yhteystiedot.html>

Office of the Data Protection Ombudsman
P.O. Box 800
FIN-00521 HELSINKI
FINLAND

Address:
Ratapihantie 9, 6rd floor
00520 HELSINKI
Tel: +358 29 56 66700 (exchange)
Fax: +358 29 56 66735
Email: tietosuoja@om.fi

15. Right to prohibit processing

- You have the right to prohibit Monidor Ltd to process your personal data for purposes of direct advertising, distance selling, other direct marketing, market research, opinion polls, catalog on persons or genealogical research.

- You have the right not to be subject to a measure which produces legal effects concerning you or significantly affects you, and which is based solely on automated processing intended to evaluate certain personal aspects relating to you or to analyze or predict in particular your performance at work, economic situation, location, health, personal preferences, reliability or behavior.
- You have the right to object, on grounds relating to your particular situation, to the processing of personal data which is based on either of the following grounds for processing: (i) when processing has been found necessary for the purposes of the legitimate interests of Monidor Ltd or (ii) when processing has been found necessary in order to protect your vital interests. You however do not have the right to object, if Monidor Ltd demonstrates compelling legitimate grounds for the processing which override your interests or fundamental rights and freedoms.

16. Right to be forgotten and to erasure

- You have the right to obtain from Monidor Ltd the erasure of personal data relating to you and the abstention from further dissemination of such data, especially in relation to personal data which are made available by you while you were a child, where one of the following grounds applies:
 - (a) the data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - (b) you withdraw the consent on which the processing is based, or when the storage period consented to has expired, and where there is no other legal ground for the processing of the data;
 - (c) you object to the processing of personal data pursuant to Section 15 of this policy; or
 - (d) the processing of the data does not comply with lawful requirements for other reasons.

Instead of erasure, Monidor Ltd shall restrict processing of personal data where:

- (a) their accuracy is contested by you, for a period enabling Monidor Ltd to verify the accuracy of the data;
 - (b) Monidor Ltd no longer needs the personal data for the accomplishment of its task but they have to be maintained for purposes of proof; or
 - (c) the processing is unlawful and you oppose their erasure and request the restriction of their use instead.
- In cases of restriction of processing of personal data in cases defined above, the personal data may, with the exception of storage, only be processed for purposes of proof, or with your consent, or for the protection of the rights of another natural or legal person or for an objective of public interest.

17. Processing of personal data of a child

- By giving consent to this privacy policy, you declare that you are at least 18 years of age. If you are less than 18 years of age, your parent or custodian's consent is required on your behalf.