

## PRIVACY POLICY

(Privacy policy, in accordance with section ten of the Personal Data Act (523/1999))

### 1. Controller

Itä-Savon Uusyrityskeskus ry, Puistokatu 1, 57100 Savonlinna, Business ID 1468776-3, Tel. 0400-704624

### 2. Contact persons for registrations

Ms Katja Remes or Mr Pekka Turunen (firstname.lastname@savonlinna.fi) can answer questions and feedback about the register.

### 3. Title of the register

Itä-Savon Uusyrityskeskuksen asiakas- ja sidosryhmärekisteri (Customer and Stakeholder Group Register of the Enterprise Agency of Eastern Finland)

### 4. Purpose of the processing of personal data

The primary basis for the processing of customer data concerns the customer relationship (agreement), the customer's assignment, the customer's authorized consent or other relevant relationship between Itä-Savon Uusyrityskeskus and its customer. Personal data may be processed for the following purposes:

The management, implementation, development and monitoring of customer relationships, membership relationships, stakeholder relationships, customer service and their related communications and marketing.

Customer relationship analysis, grouping and reporting, and the development objectives of Uusyrityskeskus. The collection and processing of customer feedback and customer satisfaction data. Processing tasks may be outsourced to external service providers in accordance with, and within the limits of, data protection legislation. Based on customer data, region-specific reports may be created for authorities, universities, cities and municipal councils, entrepreneur organizations, chambers of commerce and media parties. Such reporting will not, however, contain individual and identifiable customer data.

### 5. Data content of the register

#### 5.1. Individual customers:

First names, Last name, Address information, Email address, Telephone number, Date of birth, Citizenship, Language, Place of residence, Gender, Employment status, Entrepreneurship background/ Previously employed as an entrepreneur, when. Field, Current employer, Occupation, Educational base, Business support training, Authorization to send post / Authorization to provide data to specialists, Where did they learn about the services of Uusyrityskeskus. Customer categories (immigrant, start-up entrepreneur, active entrepreneur, seeking a company to buy, relinquishing a company, customer awaiting a decision, belonging to a project). When did they become a customer / first visit date; Establishment, relinquishment, purchase date of the company.

What events have been performed with the customer, such as: Participation in events (trainings), Customer visits, Customer-specific business plans and calculations, Start-up agreements, Authority statements, Finnvera and financier statements, Company registration papers / notifications of changes, Specialist referrals

#### 5.2. Specialists

Specialist categories (accounting firm, financier, authority, law firm, audit firm, etc.)  
Specialist organization, Specialist's name, phone number, e-mail address, area of competence.

#### 5.3. Corporate customers

Company name, Business ID  
Contact person, phone number, email address, task, address information  
Field, turnover, profit, employment Information  
Investment requirement  
Belonging to a project / projects  
Customer events  
Customer materials

#### *5.4. Customers who have participated in training*

Name, email address, phone number

### **6. Regular sources of data and disclosure of data**

#### *Individual customers:*

Primarily the customer data form is filled in by the customer, where their signature provides consent to the disclosure of the data, when necessary, to specialists (authorities, PRH, TE office, financiers, accounting firms, insurance companies, audit firms, law firms).

Recorded data related to customer meetings.

Business plans, calculations and other materials made by the customer.

Our website uses cookies. Cookies and the data they collect are used to improve the efficiency and user-friendliness of the services. Cookies collect data on how visitors move about and behave on websites. Cookies are necessary for the functionality of some of the Internet services provided by the controller, and we do not guarantee the functionality of the services unless the cookie functionality is in use. The data gathered through cookies is used to target communication and marketing, and to optimize marketing efforts.

#### *Corporate customers:*

In addition, we can collect data from public information sources (e.g. business registers, corporate websites) to keep our customers' data up to date.

The controller does not disclose personal data to third parties. Only specialists required by authorities who are already approved by the customer when signing the customer data form.

### **7. Data retention / deletion**

The data may be disclosed to authorities, specialists, financial institutions, etc., based on the customer's consent, for measures that meet the customer's needs.

In order to determine customer satisfaction, the name and email data will be transferred to a separate customer satisfaction measurement program, if necessary.

Customer, member, and stakeholder data will not be disclosed to third parties, except as provided in the agreement, separate consent and / or specific regulations.

We need to keep the data for a long time in our customer records, due to Requirements of authorities (e.g. EU projects))

Long-term business relationships, customer-specific background data is maintained in the system throughout the life cycle of companies.

The data can be deleted upon the customer's request, or if the customer relationship is found to be completely finished.

### **8. Transfer of data outside the EU or EEA area**

We process personal data primarily in the EU and EEA.

If personal data is processed outside the EU and the EEA, we will ensure the security and protection of the data through appropriate agreements (Privacy Shield – protection system or another similar arrangement, e.g. EU commission model contract clauses).

## 9. Principles of the data safety

### *Manual material:*

The personnel undertake to take all reasonable steps to prevent any confidential material from being accessed and disclosed to third parties. This means e.g. the fact that the material provided by the customer and the documents relating to them are kept in locked premises and cabinets during the advisory process. The controller only retains the data for as long as it is necessary for the purpose of the register, the customer, the regulations of the authorities. Unnecessary printed materials are delivered to a locked collection point for destruction.

### *Computer-based material:*

Data is collected in system databases that are protected by firewalls and other technical means. Databases are located in locked and guarded premises and access to the data is restricted to certain predefined persons.

The controller only retains the data for as long as it is necessary for the purpose of the register, the customer, the regulations of the authorities.

Access to the registers requires a username and password. The access rights are granted to a member of the staff of the controller whose status and tasks are associated with the access rights. Employees have an obligation towards professional secrecy written into their employment agreements.

## 10. Right of inspection

The customer has the right to inspect what data has been stored about him or her in the customer register of the Itä-Savon Uusyrityskeskus. A request for data inspection must be made by e-mail to [uusyrityskeskus@savonlinna.fi](mailto:uusyrityskeskus@savonlinna.fi)

## 11. Right to claim rectification of data

You have the right to request a rectification, deletion or supplementation in the register due to inappropriate, unnecessary, incomplete or outdated personal data in writing by email to [uusyrityskeskus@savonlinna.fi](mailto:uusyrityskeskus@savonlinna.fi)

## 12. Other rights related to the processing of personal data

The right to limit the processing of data under Article 18 of the EU Data Protection Regulation by notifying the office of the Itä-Savon Uusyrityskeskus by email to [uusyrityskeskus@savonlinna.fi](mailto:uusyrityskeskus@savonlinna.fi)