# **Privacy Policy, Pallet Master Oy**

This is a statement regarding the processing of your data in accordance with the EU General Data Protection Regulation, GDPR (679/2016).

# Registrar

Pallet Master Oy

Business ID: FI3407857-8

Postal address: Takojantie 4, 16300 Orimattila, Finland

Phone: +358 (0)40 610 2323

E-mail: palletmaster@palletmaster.fi

# Communication regarding privacy matters

Jussi-Mikko Makkonen +358 (0)40 610 232, jussi-mikko.makkonen@palletmaster.fi

For all questions related to the processing of personal data and in situations related to the exercise of rights, the registrant is advised to contact the above-mentioned person.

#### Name of the filing system

Pallet Master Customer and Marketing Register

### The basis and purpose of personal data processing

The legal basis for the processing of personal data is/are the following:

- Consent given by the registered person (registrant) to the processing of personal data
- · Contractual relationship between the registered (registrant) and the registrar
- Fulfilling the legal obligations of the registrar
- Legitimate interest of the registrar
- The public interest or the exercise of a public power vested in the registrar
- Protection of vital interests of the registrar

We process personal data to manage, maintain, develop and analyze customer relationships. We also process personal data for the production, provision and development of the services. Personal data may be used for website development, marketing, market research and customer communications, which may be electronic and targeted.

## Regular data sources

The personal data processed are regularly obtained from the following sources:

- · from the registrant itself
- from the commercial register

The collection of personal data is based on the customer relationship or other connection of the registrant with us. We collect information when we enter into a contract or when someone registers or uses our services. We track cookies - a person's visit to our website leaves a trace, an IP address. We may also collect information in connection with various marketing activities and public information sources.

## Personal data to be processed

The Registrar only collects personal information about registrants that is relevant and necessary for the purposes described in this Privacy Policy.

The following information about the Registrant is processed

- The person's name, title and position in the company
- Company name, contact information and industry
- The individual's telephone number/mobile number and email address
- The person's marketing authorizations and prohibitions

- Information relating to online behavior on websites, information collected through cookies
- Classification information provided by the individual or collected with the individual's consent
- Publicly available classification information

#### Disclosure of personal data

For example, information may be disclosed to government authorities as required by law. We do not disclose personal information for external marketing purposes. Due to the technical or operational implementation of data processing, some of the data may be located with our subcontractors or our partners. They process the data only to the extent necessary to provide the service. They will not use the information for any other purpose and will not disclose the information to third parties.

# Transfers of personal data to third countries

Personal data will not be transferred outside the EU and the European Economic Area.

If this is done for a specific reason, the transfer will be carried out in accordance with the adequacy decision adopted by the European Commission. The controller may transfer data outside the EU and the EEA, for example, for technical maintenance and processing by a subcontractor.

## Protection of personal data

The Registrar shall process personal data in a manner designed to ensure adequate security of the personal data, including protection against personal data, including protection against unauthorized processing, accidental loss, destruction or destruction or damage.

The Registrar uses appropriate technical and organizational security measures to achieve this objective, including firewalls, encryption technology and secure device rooms, access control, careful management of user IDs for information systems, and training of personnel involved in the processing of personal data.

In accordance with the Employment Contracts Act (55/2001) and the related confidentiality agreements, all employees who process personal data are bound to maintain confidentiality regarding matters related to the processing of registered personal data.

# **Data retention period**

The Registrar will only retain personal data for as long as is necessary to fulfil the purposes of personal data processing as defined in this Privacy Policy. Unnecessary and outdated personal data will be deleted from the Registry in an appropriate manner.

The Registrar may be required to process some personal data held in the Register for a longer period in order to comply with legal or regulatory requirements.

# Rights of the registrant

Right of access to personal data

The registered person has the right to obtain confirmation as to whether or not personal data relating to him/her are being processed and, if so, to obtain a copy of such data.

#### Right to rectify data

The registered person has the right to request that inaccurate personal data concerning him/her be corrected. The registered person also has the right to have incomplete personal data completed by providing the necessary data.

# The right to delete data

The registrant has the right to request the deletion of personal data concerning him/her, if

- A. the personal data are no longer necessary for the purposes for which they were collected
- B. the registrant withdraws the consent on which the processing of personal data was based;
- C. there is no other legal basis; or
- D. personal data have been processed unlawfully.

## Right to restrict processing

The registrant shall have the right to restrict the processing of personal data concerning him or her where

- A. the Registrant disputes the accuracy of his/her data
- B. the processing is unlawful and the Registrant objects and requests the deletion of his/her data in exchange for;
- C. the use of the data is restricted; or
- D. the Registrar no longer needs the personal data for the original purposes of the processing; but
- E. the Registrant needs it for the preparation, presentation or defense of legal claims.

#### Right to object

The registrant has the right to object at any time to the processing of personal data concerning him or her on the grounds of his or her particular situation.

The registrar may no longer process the registrant's data unless the registrar can demonstrate that there is an overriding legitimate interest that overrides the interests, rights and freedoms of the registrant, or if the processing is necessary to prepare, present or defend a legal claim.

Where personal data is processed for direct marketing purposes, the Registrant shall have the right to object at any time to the processing of personal data relating to him/her for such marketing purposes, including profiling for direct marketing purposes.

# Right to withdraw consent

The data subject shall have the right to withdraw his or her consent to processing at any time, without prejudice to the lawfulness of any processing previously carried out on the basis of that consent.

The right to have data transferred from one system to another

The registered person has the right to have the personal data concerning him or her, which he or she has provided, transferred from one system to another.

## Right to complain to the supervisory authority

The national supervisory authority for personal data matters is the Office of the Data Protection Commissioner, which operates in conjunction with the Ministry of Justice. The registrant has the right to lodge a complaint with the supervisory authority if the registrant considers that the processing of personal data is in breach of the relevant legislation.

#### **Changes to the Privacy Policy**

The Registrar is constantly developing its operations and may need to amend and update its Privacy Policy as necessary. The changes may also be due to changes in data protection legislation.

If there is a material change in the privacy practices relating to the processing of personal data, the Registrar will post an updated privacy policy on its website and seek consent where necessary.