

PRIVACY POLICY

Personal Data Act (523/1999), Sections 10 and 24

Read the instructions before filling in the form.
Use attachments if needed.

Date of issue 14/06/2018

1a Controller	Name Stén & Co Oy Ab
	Address Ilvesvuorenkatu 4, 01900 Nurmijärvi, Finland
	Other contact information (for example, phone during business hours, email) Phone +358 207 434 610. Available from 7:30 am to 4 pm.
2 Contact person for personal data file	Name Fatma Gharbi-Tapio
	Address c/o Stén & Co Oy Ab, Ilvesvuorenkatu 4, 01900 Nurmijärvi, Finland
	Other contact information (for example, phone during business hours, email) Phone +358 9 2746 2321. Available from 7:30 am to 4 pm. Email GDPR(at)sten.fi
3 Name of personal data file	Stén's customer data file
4 Purpose of processing of personal data	<p>The basis for the processing of personal data is the business relationship between the client and Stén & Co Oy Ab or the legitimate interest of Stén & Co Oy Ab on grounds of a business relationship or other relevant connection.</p> <p>Personal data are processed primarily for the fulfilment of the obligations and rights mandated by the commercial contract between the client and the controller. Personal data can also be processed for the use, implementation, development, and monitoring of communication and marketing, as well as collecting and processing customer feedback on grounds of the legitimate interest of the controller.</p>
5 Content of personal data file	<p>The following data can be recorded of the data subject:</p> <ul style="list-style-type: none">- name- address- email address- phone number- company or organisation- position in company
6 Regular sources of data	<p>The data are collected primarily by the activities of the controller. We receive data primarily from the customer data file of the company or from the data subjects themselves. In addition, personal data can also be collected and updated for the purposes described in this privacy policy based on data available from public sources to the extent allowed by applicable law. Updating the data in this manner is carried out manually.</p>

<p>7 Regular transfer of data</p>	<p>Personal data can be disclosed and transferred for the purpose of personal data processing to the service providers of the controller and the companies in the same group as well as to the other companies in the group. The mentioned processors of personal data do not have the right to process the personal data unless acting on the controller's behalf.</p>
<p>8 Transfer of data outside of EU or EEA</p>	<p>The content of the personal data file will not be transferred outside of the European Union or the European Economic Area.</p>
<p>9 Principles of protection of personal data file</p>	<p>A) Manual content The personal data file is only used by those people who are mandated to use it. Manual content is stored in the facilities of Stén & Co Oy Ab in a place such that only the employees of the company have access to the content.</p> <p>B) Content processed by computers The data stored and processed in our information system are only usable by a limited group of designated persons. The use requires logging in to our information system with a personal username and password. Our information system is protected by appropriate antivirus software and a firewall. The database and its backup copies are located in locked premises and they can only be accessed by certain pre-designated persons.</p> <p>We store the personal data indefinitely. We periodically assess the necessity of storing the data considering the applicable legislation and take care of reasonable measures for ensuring that no personal data of the data subjects stored in the personal data file are incompatible, out of date, or erroneous considering the purpose of the processing of the data. In such cases, we will either rectify or delete this data without delay.</p>
<p>10 Right of access</p>	<p>The data subjects are responsible for the validity of their data and they are to report if any changes are required in the data they have provided. The data subjects have the right to inspect which information has been stored of them in the personal data file. The request to access the data must be submitted in writing to the controller's representative mentioned in Section 2.</p> <p>More information on the right of access can be found at: http://www.tietosuoja.fi/fi/index/materiaalia/lomakkeet/tarkastuspyyntojakorjaamisvaatimus.html</p>
<p>11 Right to demand correction of data</p>	<p>The data subjects have the right to demand the correction of erroneous data in the data file and the rectification and completion of erroneous data relating to them. The controller can also correct the erroneous data on its own initiative after noticing an error.</p> <p>The request for correcting data in the data file must be submitted in writing to the controller's representative mentioned in Section 2.</p> <p>More information on the request of correction of data can be found at: http://www.tietosuoja.fi/fi/index/materiaalia/lomakkeet/tarkastuspyyntojakorjaamisvaatimus.html</p>

<p>12 Other rights relating to processing of personal data</p>	<p>The data subjects have the right to object to the processing of personal data or to restrict the use of personal data for the purpose of direct marketing or other means of electronic communication by contacting the controller's representative mentioned in Section 2 in writing.</p> <p>In addition, the data subjects have the right to lodge a complaint concerning the processing with a supervisory authority and to request the deletion or transfer of the data from one system to another.</p>
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