

HARMAJA 10 OY'S PRIVACY POLICY

(updated 27.11.2018)

This Harmaja 10 Oy's (hereinafter also "we", "us" or "our") privacy policy describes our personal data processing activities as the controller (hereinafter "Privacy Policy") for the categories of data subjects described in Section 3 below (hereinafter also "you").

This Privacy Policy contains our records of processing activities as the controller and is also a privacy notice from us to you of the ways we process your personal data. Thus, this Privacy Policy covers at least the information required in Articles 13, 14 and 30 of the EU's General Data Protection Regulation (679/2016) (hereinafter "GDPR").

We have a unilateral right to modify this Privacy Policy. The modifications take effect immediately when we post the up to date version of our Privacy Policy to our website.

1) CONTROLLER

Name: Harmaja 10 Oy

Business ID: 2789909-5

Address: Lohitie 7 A 1, 02170 Helsinki

2) CONTACT PERSON

Name: Anna-Leena Raij

Contact details: +358 50 350 5182, anna-leena@skipperi.fi

3) DATA SUBJECTS AND PERSONAL DATA	4) PURPOSE FOR PROCESSING	5) LEGAL BASIS FOR PROCESSING
Customers and potential customers: <ul style="list-style-type: none">• contact details; and• data relating to client relationships	Management and development of customer relationships	Contract ⇒ to perform the contracts to which we are a party to
	Direct marketing to our clients and potential corporate clients: <ul style="list-style-type: none">• Emails• Phone calls	Our legitimate interest ⇒ to manage and develop our client relationships and further develop our business operations NB! You have a right to opt-out of direct marketing each time we provide marketing to you.

<p>Affiliates and potential affiliates:</p> <ul style="list-style-type: none"> ● contact details; and ● data relating to affiliate relationships; ja ● data we are required to process due to our legal obligations 	<p>Management and development of affiliate relationships</p>	<p>Contract</p> <p>⇒ to perform the contracts to which we are a party to</p>
<p>Jobseekers:</p> <ul style="list-style-type: none"> ● contact details; ● CV data; ● possible registration data; and ● possible other data the data subject chooses to disclose to us 	<p>Management of job applications and jobseeker relationships</p>	<p>Our legitimate interest</p> <p>⇒ to manage our jobseekers and possibly employ them</p> <p>NB! You have a right forbid us from processing your personal data.</p>
	<p>Compliance with legal obligations</p>	<p>Legal obligations</p> <p>⇒ to comply with several legal obligations as an employer</p>
<p>Persons who contact us, including contacts made through our social networks (e.g. when a data subject follows our LinkedIn page)</p> <ul style="list-style-type: none"> ● contact details; ja ● possible other data the data subject chooses to disclose to us 	<p>Management of contacts</p>	<p>Our legitimate interest</p> <p>⇒ to manage contacts made to us</p> <p>NB! You have a right forbid us from processing your personal data.</p>
<p>Persons who wish to receive direct marketing</p> <ul style="list-style-type: none"> ● emails 	<p>Direct marketing to those who wish to receive it:</p> <ul style="list-style-type: none"> ● Emails ● Phone calls 	<p>Consent</p> <p>⇒ to provide direct marketing to those who wish to receive it</p>

6) REGULAR SOURCES OF INFORMATION

Information regarding the data subject are regularly gathered from:

- data subjects themselves;
- our social networks, if a data subject so chooses (e.g by following our LinkedIn page);
- our affiliate's; and
- from the Population Register Center/Population Information System, Posti's address database, phone companies' databases and other similar private and public registries.

7) PERIOD FOR WHICH THE PERSONAL DATA WILL BE STORED

Data subjects	Retention period
7.1) Customers	Necessary data shall be retained for a period of three (3) years following the end of customer relationship.
7.2) Potential customers	Necessary data shall be retained for a period of three (3) year following the last contact made, if no customer relationship is borne.
7.3) Affiliates	Necessary data shall be retained for a period of three (3) years following the end of cooperation.
7.4) Potential affiliates	Necessary data shall be retained for a period of three (3) year following the last contact made, if no affiliate relationship is borne.
7.5) Jobseekers	Necessary data shall be retained for a period of twelve (12) months following the first contact made, if the jobseeker has not turned into our employee.
7.6) Persons who contact us (not including social media)	Necessary data shall be retained for a period of three (3) years following the contact.
7.7) Social media contacts	Necessary data shall be retained for as long as the data subject deletes his/her data.
7.8) Persons wanting direct marketing	Necessary data shall be retained for as long as the data subject wants to receive direct marketing.

7.9) However, we may retain only the necessary data of the data subjects for longer than is described above, where we are required to do so by law, it is necessary due to legal proceedings and it is necessary for any similar reason. We shall be careful not to apply this Section in vain.

7.10) We inspect the necessity of the personal data stored regularly and keep records of the inspections.

8) CATEGORIES OF RECIPIENTS OF PERSONAL DATA

The recipients of personal data may consist of the following categories:

- Harmaja 10 Oy's affiliates;
- parties who offer data storage services;
- parties who offer accounting and auditing services; and
- parties who help Harmaja 10 Oy to fulfill its legal obligations.

9) INFORMATION TRANSFER OUTSIDE OF EU OR THE EUROPEAN ECONOMIC AREA

We can transfer data outside the EU /EEA. When doing so, we ensure adequate safeguards for the data.

10) DATA SUBJECTS' RIGHTS

The data subject has a right to use all of the below mentioned rights.

The contacts concerning the rights shall be submitted to the contact person stated in Section 2. The rights of the data subject can be put into action only when the data subject has been satisfactorily identified.

Right	Description
10.1) Right to inspect	<p>Having presented the adequate and necessary information, the data subject has the right to know what, if any, data the controller has stored of her/him. While providing the requested information to the data subject, the controller must also inform the data subject of the controller's regular sources of information, to what are the personal data used for and where is it regularly disclosed to.</p>
10.2) Right to rectify and erasure	<p>The data subject has a right to request the controller to rectify the inaccurate and incomplete personal data concerning the data subject.</p> <p>The data subject can request the controller to erase the personal data concerning the data subject, if:</p> <ul style="list-style-type: none"> • the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; • the data subject withdraws consent on which the processing is based on; • the personal data have been unlawfully processed; or • the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject. <p>Let it be known that the data subjects' rights to rectify and erase data does not concern the data which the controller must retain due to its legal obligations.</p> <p>If the controller does not accept the data subject's request to rectify or erase the personal data, it must give a decision of the matter to the data subject in a written form. The decision must include the reasons for which the request was not granted. The data subject may refer the matter to the relevant authorities (the Data Protection Ombudsman in Finland).</p> <p>The controller must inform the party to whom the controller has disclosed the personal data to or has received the personal data from of the rectification or erasure of personal data. However, there is no such obligation where the fulfilment of the obligation would be practically impossible or otherwise unreasonable.</p>
10.3) Right to restriction of processing	<p>The data subject can request the controller to restrict the processing of the personal data concerning the data subject where one of the following applies:</p>

	<ul style="list-style-type: none"> ● the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data; ● the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead; ● the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims; or ● the data subject has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject. <p>If the controller has based the restriction of the processing of personal data on the abovementioned criteria, the controller shall give a notification for the data subject before removing the restriction.</p>
10.5) Right to data portability	<p>The data subject shall have the right to receive the personal data concerning her/him, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where the processing is based on consent or a contract.</p>
10.4) Right to object	<p>Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning her/him for such marketing, which includes profiling to the extent that it is related to such direct marketing.</p> <p>Where personal data are processed on the basis of our legitimate interests, the data subject shall have the right to object the processing of personal data concerning her/him for such purposes.</p>
10.6) Automated individual decision-making, including profiling	<p>The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.</p> <p>However, the data subject shall not have the aforementioned right if the decision is:</p> <ul style="list-style-type: none"> ● necessary for entering into, or performance of, a contract between the data subject and us; ● is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or ● is based on the data subject's explicit consent.

10.7) Right to withdraw consent	Where the legal basis for the processing of personal data is the consent of the data subject, the data subject shall have the right to withdraw her/his consent.
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11) RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

Data subject shall have the right to lodge a complaint with a supervisory authority, if the data subject considers that the processing of personal data relating to him or her infringes the GDPR. The complaint can be lodged in the Member State of her/his habitual residence, place of work or place of the alleged infringement.

12) COOKIES

Cookies are small text files that a website stores on your device when you browse that website. Cookies store data of your website use.

Our websites use cookies to either improve or market our services. Cookies used to improve websites are a common part of all modern websites. In marketing we use the cookies provided by Google, Facebook and Hotjar.

You can control and/or remove cookies freely at the individual browser level. Instructions can be found for example in here: aboutcookies.org

13) SECURITY OF PROCESSING

Harmaja 10 Oy uses all reasonable efforts to maintain physical, electronic, and administrative safeguards to protect personal information from unauthorized or inappropriate access, but Harmaja 10 Oy note that the Internet is not always a secure medium. Harmaja 10 Oy restricts access to information about data subjects only to the personnel of Harmaja 10 Oy that need to know the information e.g. for responding to inquiries or requests made by the data subjects.