## **Contract register - privacy policy**

Creation date	1.6.2018
Data controller	HELBUS Helsinki School of Business Runeberginkatu 22-24
	kari.jaaskelainen@helbus.fi
Contact person in matters related to the filing system	Kari Jääskeläinen Runeberginkatu 22-24
	kari.jaaskelainen@helbus.fi
Name of filing system	Contract register
Purpose of personal data	Legal bases of processing data is agreement.
processing	The purpose of use for the filing system is to maintain, manage, archive, and process contracts signed with customers and other interest groups as well as to maintain customer relationships.
	Information can be used to improve the company's operation, for statistical purposes, and for producing more personalised content. Personal data are processed in accordance with the requirements of the Personal Data Act.
	Data in the filing system can be used in the company's own filing systems for example for targeted advertising without disclosing personal data to external parties. The company may use partners to maintain customer and service relations, which means that part of the data held within the filing system may be transferred onto a partner's server due to technical requirements.
	These data will be processed solely for the purpose of maintaining the company's customer relations using technical interfaces.
Legitimate interest basis	
Categories of personal data in question	Name of contact person for customer company, themes agreed on.
Recipients and recipient groups	The data controller's personnel and outsourcing partners when applicable.
Concent	
Data content of filing system	Contract register contains the following information: - First and last name of person - Community represented - Business ID - Email address - Postal address - Phone number - Ordered services - Other jointly agreed upon business matters
Regular data sources	Phone and other electronic methods of communication.
	Data can also be obtained from subcontractors related to the use or production of a specific service.

other activities in the digital environment can be vebsites, data systems or other digital sources using cookies or customer-specific identifiers.  gister are used solely by the company, except when vider is used either to provide added value services ited decision-making.  The deta decision to the company's partners ated to credit applications, debt collection or ituations required by law. A data subject's personal point the data subject's request unless such removal is an outstanding invoices, or debt collection.  The contract.  The are used solely by the company, except when an er is used either to provide added value services or to recision-making.  The deta external parties or to the company's partners ated to credit applications, debt collection or ituations required by law.  The all data will be removed upon the data subject's moval is prohibited by legislation, outstanding cion.  The transferred outside the European Union unless the technical implementation of the company's or its
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lected during customer events and other manually ontaining customer data are stored in a locked and tial processing. Only specific employees who have greements have the right to process manually stored
s working for or on behalf of the company have the t register and maintain data stored in it. Each specific onal username and password. Each user has signed nent. The system is protected by a firewall to prevent system.
website. A cookie is a small text file that is sent to s computer. Cookies do not cause any harm to the . The primary purpose for the use of cookies is to e a visitor's user experience on our website as well ove the functionality and content of our site.
kies can also be used in targeted communication and timising marketing activities. Visitors cannot be
on cookies. However, data collected with cookies can data received from the user in other situations, for fills in a form on our website.
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	Your rights A user visiting our website has the right to prohibit the use of cookies at any time by changing his or her browser settings. Most browser software give the option of disabling cookies and of removing cookies that have already been saved.
	Disabling cookies may affect the functionality of the website.
	GOOGLE ANALYTICS We collect user statistics from our website using the Google Analytics service, the purpose of which is to monitor site activity, improve site functionality and develop marketing. The data collected cannot be linked to individual users or persons.
	Additionally, we collect Google Analytics Demographics data, which includes for example the age and gender of the visitor as well as topics of interest. Settings related to the collection of these data can be changed using your personal Google account at https://www.google.com/settings/ads
	Google Analytics -monitoring can be disabled with a Chrome add-on.
Information source	
Automatic processing and profiling	
Right of access	The data subject has the right to check what data has been stored about him or her in the filing system. A request for data access must be given in writing by contacting the company's customer service or the filing system's contact person either in Finnish or English. The request for data access must be signed. The data subject has the right to prohibit the processing of his or her data and its disclosure for the purposes of direct marketing, distance marketing or opinion polls by contacting the company's customer service.
Right to lodge	If you consider that an infringement of the General Data Protection Regulation has occurred in the processing of your personal data, you have the right to lodge a complaint with a supervisory authority.
	The complaint can also be lodged in a member state where you are a permanent resident or where you are employed.
	Contact information for the Finnish national supervisory authority: Office of the Data Protection Ombudsman PL 800, Lintulahdenkuja 4, 00530 Helsinki tel. +358 29 566 6700 tietosuoja@om.fi www.tietosuoja.fi/en/
Right of portability	The data subject has the right to transfer his or her own data from one system to another.  The transfer request can be addressed to the registry contact person.
Right to rectification	Taking into account the purposes of processing, any data stored in the filing system that is inaccurate, unnecessary, incomplete, or outdated must be erased or rectified.
	A written request for rectification, signed by hand, should be sent to the company's customer service or the personal data filing system's administrator.
	The request should specify what information should be rectified and on what grounds. Rectification shall be carried out without delay.
	Notification of rectification will be sent to the party who provided the inaccurate data or to whom the data were disclosed.

If a request for rectification is denied, the responsible person of the filing system will provide a written document stating the grounds for the denial of the request for rectification. The data subject concerned may then pass the matter along to the Data Protection Ombudsman.

## Other rights related to the processing of personal data

Right to restrict processing

The data subject has the right to request that the processing of their personal data is restricted for example if data stored in the filing system is erroneous. Requests should be sent to the responsible person of the filing system.

## Right to object

The data subject has the right to request for personal data pertaining to them, and the data subject has the right to request for the rectification or erasure of said data. Request can be sent to the contact person of the filing system.

If you are acting as the contact person of a company or organisation, your data cannot be erased during this time.

The data subject has the right to prohibit the disclosure of processing of personal data for the purposes of direct marketing or other marketing, the right to demand the anonymization of data where applicable, as well as the right to be completely forgotten.