



## **GALLANT GROUP'S AND ITS SUBSIDIARIES MARKETING AND CUSTOMER REGISTER AND PRIVACY STATEMENT**

Register and Privacy Statement based on Article 30 of the European Union Data Protection Regulation (2016/679 / EU). We reserve the right to update this leaflet as necessary.

*Updated 28.1.2020*

### **Registrar**

Name: Gallant Group Oy

VAT Number: 2994701-1

Address: Hämeenkatu 26 A, 33200 Tampere

### **Contact person for registry matters**

Aki Kuusisto, CTO

+358 50 535 3025

aki.kuusisto@gallant.fi

### **Name of the register**

Gallant's MARKETING AND CUSTOMER REGISTER

### **Reason for keeping the register**

Personal and business information is processed for the purpose of implementing services, customer relationship management, marketing, sales, service development and analysis. Customer information is collected from public sources and from the customer. Data will be processed to the extent permitted and required by the Personal Data Act, with the individual's consent.

### **Information contained in the register**

In the registers, we process the personal data of a customer or other data subject, as described in the following sentences. The register contains customer company names, business IDs, contact information, contract and billing information between the parties, and information on the nature of the customer company business.



The register may contain the following information about the representatives and employees of the client companies: name, personal identification number, address, telephone number, tax information, bank account, salary information, possible enforcement information.

In addition, the register contains information about the data subject's terminal equipment (IP address or other identifier), the use of various digital content, and online behavior.

#### **Retention period of data**

Personal and business information is retained for as long as it is needed to maintain the customer relationship or when the customer wants to delete it.

#### **Data source for registry information**

Records are collected when using Gallant's services, from tax authorities, and from public sources such as business and community information systems, publicly available sources on the Internet, or other similar records, in accordance with data protection law.

#### **Regular disclosures and transfers of information outside the EU or the EEA**

Gallant may disclose registry information to tax authorities, insurance companies, finance companies, trade unions, the National Pension Fund or employment pension funds, to the extent permitted by applicable law and obligations. Where appropriate, information may also be disclosed outside the EU or the EEA.



### **Use of cookies**

A cookie is a small text file sent to and stored on a user's computer that enables the webmaster to identify the visitors who frequently visit the site, to facilitate visitor logins to the site, and to enable composite information about the visitors. This feedback enables us to continually improve the content of our pages. Cookies do not harm users' computers or files.

Käytämme niitä siten, että voimme tarjota asiakkaillemme kunkin yksilöityjen tarpeiden mukaisia tietoja ja palveluita.

In addition to using, analyzing and developing websites, we use the information in marketing targeting and optimization. Our website uses services provided by third parties (Google) to analyze and monitor various types of information. The site also uses social media cookies. (Facebook, LinkedIn, Instagram)

If a Visiting User does not want us to receive the above information through cookies, most browser programs allow you to disable the cookie feature. This is usually done through the browser settings.

However, please note that cookies may be necessary for the proper functioning of some of the sites we maintain and the services we provide.



### **Confidentiality and security of the personal data register**

Personal and business information will be kept confidential. Gallant's personnel and third parties acting on its behalf are bound by the confidentiality of all customer and registry information. The registry management environment is protected by user-specific logins, passwords, permissions, and the IT partners' network is protected by a firewall or other appropriate measures.

### **Rights of the data subject**

The data subject shall have the right to verify what personal data are stored in the personal data register. A written request for verification must be sent and signed to the person responsible for registry matters. Identity is verified at the time of disclosure.

The data subject has the right to request the correction or deletion of incorrect or outdated data or the transfer of data from one system to another. He also has the right to restrict or object to the processing of his data in accordance with Articles 18 and 21 of the EU Data Protection Regulation.

The data subject shall have the right to withdraw his or her prior consent to the processing of data or to lodge a complaint with the supervisory authority regarding matters relating to the processing of his or her personal data.

The data subject also has the right to prohibit the use of their data for direct marketing purposes.

The data subject may lodge a complaint against the processing of personal data with the supervisory authority, which is the data protection officer.



## **Changes to Privacy Policy**

Changes to this privacy statement and related information may be made by the controller. The controller recommends that data subjects visit this Privacy Policy on a regular basis to be informed of any changes that may have been made to it.