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# PRIVACY STATEMENT: REGISTER OF PERSONS IN CRM

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## 1 CONTROLLER

KLINGER Finland Oy, Tinankuja 3, 02430 Masala

Telephone number +358 10 400 1011

E-mail [info@klinger.fi](mailto:info@klinger.fi)

Business ID 0195519-1

## 2 CONTACT PERSON RESPONSIBLE FOR THE REGISTER

Tea Hurme

[tietosuojavastaava@klinger.fi](mailto:tietosuojavastaava@klinger.fi)

telephone number +358 10 400 1222

## 3 NAME OF REGISTER

Register of persons in CRM

## 4 LEGAL BASIS AND PURPOSE OF PROCESSING PERSONAL DATA

CRM is a register of the contact persons of customers and suppliers and B2B marketing. The register also contains the contact details of potential customers and suppliers.

The legitimate interest of the controller constitutes the legal basis for processing personal data, in line with the EU General Data Protection Regulation (customer relationship or a product or service marketed by KLINGER Finland Oy is connected to the person through his/her work task or area of responsibility).

Processing is performed for the purpose of liaison with customers and suppliers, maintaining relationships with customers and suppliers, and for B2B marketing.

The data is not used for automated decision-making or profiling.

## 5 DATA CONTENT OF THE REGISTER

The data recorded in the register: name, position of the person, company/organisation, contact details (telephone number, e-mail address, address), information about offered and ordered

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services and changes therein, invoicing details, other data related to the customer or supplier relationship and ordered services.

The data of the contact persons of customers and suppliers are stored in the register for six years from the end of the calendar year, when the last customer event (e.g. sales, purchase, tendering, meeting with the customer or supplier) has occurred. The personal data of potential customers and suppliers are stored for two years from receipt. Deletion is performed manually once a year and is organised by the Data Protection Officer.

## 6 NORMAL SOURCES OF INFORMATION

The information recorded in the register is received directly from the customer or supplier, such as from the basic data form for customers and suppliers, by e-mail, telephone, from contracts, customer and supplier meetings and other occasions, where the customer or supplier submits their data.

Personal data may also have been bought from companies, which sell personal data for B2B direct marketing purposes. In such case the services marketed by KLINGER Finland Oy are connected to the person based on his/her work task or area of responsibility.

## 7 NORMAL PROVISION OF DATA AND DATA TRANSFER OUTSIDE THE EU OR EEA

Normally the data are not provided to other parties or transferred by the controller outside the EU or EEA.

## 8 REGISTER PROTECTION PRINCIPLES

The register is managed with due care and the data processed with data systems are protected by appropriate measures. When the registry data are stored on Internet servers, the physical and digital data security of such equipment is managed by appropriate measures. The controller makes sure that the recorded data and the user rights for servers as well as other data critical for the protection of personal data are treated confidentially and only by employees, whose job description includes such task.

## 9 THE RIGHT OF ACCESS AND THE RIGHT TO REQUEST RECTIFICATION OF DATA

Each person in the register has the right to access the data recorded in the register about them and to request rectification of possible inaccurate data or updating incomplete data. Should a person wish to view the data recorded about them or request rectification thereof, such request should be sent to the controller in writing ([tietosuojavastaava@klinger.fi](mailto:tietosuojavastaava@klinger.fi)). The controller may request the applicant to provide proof of identity, if necessary. The controller responds to the customer within the time limit laid down in the EU Data Protection Regulation (as a rule, within a month).

## 10 OTHER RIGHTS RELATED TO THE PROCESSING OF PERSONAL DATA

A person in the register has the right to request erasure of their personal data (the "right to be forgotten"). The persons in the register have also other rights provided in the EU General Data Protection Regulation, such as restricting the processing of personal data in certain situations. The requests should be sent to the controller in writing ([tietosuojavastaava@klinger.fi](mailto:tietosuojavastaava@klinger.fi)). The controller responds to the customer within the time limit laid down in the EU Data Protection Regulation (as a rule, within a month).