

## DESCRIPTION OF THE COMPANY'S CUSTOMER DATA FILE

### 1 Controller

Martela Corporation  
Takkatie 1  
FI-00370 Helsinki  
Tel. +358 10 345 50  
asiakaspalvelu@martela.com  
("we", "us", "our" or "Martela")

### 2 Data file contact

Anne-Maria Peitsalo  
Martela Corporation  
Takkatie 1, FI-00370 Helsinki  
anne-maria.peitsalo@martela.com

### 3 Name of data file

CUSTOMER DATA FILE

### 4 What are the legal grounds for and purpose of processing personal data?

The processing of personal data is based on the company's legal interest that arises from a customer relationship or another factual content, on the execution of an agreement or from the registered consent of the customer.

#### Purpose of processing personal data

Delivery and development of our products and services, based on e.g. customer experience surveys,  
Fulfillment of our contractual and other promises and obligations,  
Customer relationship management,  
Analysis and profiling of a customer or another data subject,  
Digital direct marketing,  
Targeting of marketing communications in our company's and other parties' online services and in communications via other electronic channels.

We use automated decision-making (including profiling) to identify data subjects' personal profiles, online behaviour and consumption habits. We use this data to target marketing and sales and to develop our services.

## 5 What data do we process?

In connection with the customer data file, we process the following personal data concerning the customer or another data subject, such as people participating in training:

- **Data subject's basic data\*** Name, customer number
- **Data subject's contact information\*** Email address, telephone number, address; job title
- **Data concerning the company and its contact persons\*** Business ID and contact persons' names, contact details and information about the company's size, net sales and industry
- **Data concerning the customer relationship and agreement**, such as business ID, contact persons' names and contact details
- **Other business information** Some Martela Group sites send cookies to the user's browser to provide them with more customised content during future visits. A cookie is an identifier containing a small amount of data, but you cannot be identified based on cookies if you have not provided personal data via our site. You can set your browser to notify you of cookies or disable cookies. In addition, payment and bank account information, etc.
- **Any other data collected separately under consent from the data subject** Marketing permission and its date of issue, digital body language data (monitoring) and responses to customer experience surveys.

The data marked with an asterisk is required for us to be able to establish a contractual and/or customer relationship. Without the necessary personal data, we will not be able to deliver the product and/or service.

## 6 Where do we obtain information?

We primarily obtain data from the following sources: the data subject, the population register, the authorities, credit information companies, providers of contact information services and online monitoring tools.

In addition, personal data may be collected and updated, for the purposes described in this personal data file description, based on data obtained from publicly available sources, the authorities or other third parties, to the extent permitted by the applicable laws. In such cases, the data is updated manually or by automated means.

## 7 To whom do we disclose data? Do we transfer data to non-EU or non-EEA countries?

With regard to processing personal data, we make use of IT, marketing and communication services partners acting on our behalf.

We may be required to disclose data to the authorities based on peremptory regulations.

We do not disclose personal data to parties in non-EU or non-EEA countries.

## **8 How do we protect data? For how long do we store data?**

Access to the system containing personal data is only provided to employees who have the right to process customer data as part of their work, as well as to IT, marketing and communication services partners acting on our behalf.

Each user has their specific user ID and password to the system. The data is collected into databases protected by means of firewalls, passwords and other technical measures. We store personal data for as long as is necessary for its purpose of use.

We regularly assess the necessity of storing data, taking the applicable laws into account. In addition, we take reasonable measures to ensure that information is not stored about the data subjects in the data file that is inconsistent with the purpose of use or is outdated or inaccurate. We will correct or delete any such information without delay.

## **9 What are your rights as a data subject?**

As a data subject, you have the right to review the data stored about you in the personal data file and demand that erroneous data be corrected or deleted, provided that legal grounds exist for doing so. To the extent that the data subject has submitted data to the customer data file and this data is processed under consent from the data subject or based on an assignment, the data subject has the right to receive the data, generally in machine-readable format, and transfer it to another controller.

As a data subject, in accordance with the EU General Data Protection Regulation (as of 25 May 2018), you have the right to object to the processing of your personal data or request that the processing of your personal data be restricted, and to file a complaint with the supervisory authorities concerning the processing of your personal data.

In addition, for special personal reasons, you have the right to object to profiling and other processing measures when the processing of data is based on legal interest between you and us. When making your demand, you must specify the special circumstance under which you are objecting to the processing of your personal data. We may refuse to implement your demand only on legal grounds.

As a data subject, you are also at any time entitled to object to the processing of your personal data, including profiling, to the extent that it is related to direct marketing.

## **10 Who can you contact?**

All enquiries and requests concerning this data file description must be made in writing or in person to the contact person specified in Section 2.