

[Heikki Hiltunen]

Public

14.5.2018

PRIVACY NOTICE – PROCESSING OF CRM DATA

Pursuant to the GDPR Art. 13-14

Updated: 14.5.2018

1 The controller

Empower Oyj

All contacts and inquiries related to this privacy notice should be addressed to

Heikki Hiltunen

Empower Oyj

Valimotie 9-11

00380 Helsinki

privacy@empower.eu

2 Processing of personal data

We collect and process personal data of our customers and contacts (each such natural person individually “Data Subject”) to support sales activities, marketing purposes (incl. sending invitations to seminars, provision of marketing material, sending surveys and newsletters) and otherwise maintaining relationship with the Data Subject.

Processing of personal data is based on the legitimate interests pursued by the controller (6. art. 1/ f of the GDPR)

3 The categories of personal data concerned

Personal data collected includes personal data in following categories:

- name
- position
- contact information
- employer
- event participation history

4 Disclosure and transfers of personal data

Personal data may be accessible and processed by Empower’s subsidiaries, subcontractors and service providers, to the extent needed in connection with the above said purposes. Empower ensures that such third parties are always bound by contracts, which sufficiently address data protection and confidentiality requirements.

Due to technical and practical requirements, the personal data may also be processed outside the EU/EEA. We apply appropriate safeguards such as EU Commission’s standard contractual clauses

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(according to articles 45-47) or any other appropriate safeguard as foreseen under the applicable data protection law.

5 Retention period

Personal data will be stored as long as data is needed for the above described purpose. Upon request by the Data Subject personal data will be removed with the exception of remark to process the Data Subject's personal data for marketing purposes.

We evaluate the necessity and accuracy of the personal data on a regular basis.

6 Data Subject's rights

The Data Subject has a right to request from Empower:

- (a) access to and rectification or erasure of the Data Subject's own personal data; and
- (b) restriction of processing concerning the Data Subject or to object to processing

Where the processing is based on a consent, the Data Subject has a right to withdraw such consent at any time. Please notice that this will not affect the lawfulness of processing based on consent before its withdrawal.

The Data Subject may exercise the aforementioned rights by contacting: privacy@empower.eu

In case the Data Subject considers that his/her rights under the data protection laws are infringed, the Data Subject may lodge a complaint with a supervisory authority (Finnish Data Protection Ombudsman).