

## Registry and Privacy Statement, Gravicon Ltd

This is Gravicon Ltd's Registry and Data Protection Statement for the processing of stakeholder data in accordance with Personal Data Act (Sections 10 and 24) and the EU General Data Protection Regulation (GDPR). Prepared on 26.10.2020. Last modified on 26.10.2020

### 1. Registry controller

Gravicon Oy, Sturenkatu 4, 00520 Helsinki, FINLAND

### 2. Contact person responsible for the registry

Pauli Jantunen, CEO, Gravicon Oy  
pauli.jantunen@gravicon.fi, +358 50 383 3789

### 3. Name of the registry

Gravicon Ltd's Stakeholder Data Registry

### 4. Legal basis and the purpose of processing the personal data

The legal basis for the processing of personal data under the EU General Data Protection Regulation is:

- personal consent (documented, voluntary, individualized, informed and unambiguous)
- a contract with the subject of the personal data
- law (Data Protection Law 1050/2018)
- person who holds a public post (Data Protection Law 1050/2018 Chapter 5 Section 28)
- legitimate interest of the controller (e.g. customer or employment relationship, membership etc.)

The purpose of processing the personal data is to interact with the clients, to maintain the customer relations, to manage the marketing etc. The data is not used for automated decision-making or profiling.

### 5. Information content of the registry

The data of the registry may include person's name, occupation, company/organization, contact information (phone number, email, address), website address, the IP-address of the internet access, social media data, information about the ordered services and their changes, billing information, other information related to the customer relationship and the ordered services. The information is kept for the time being and everyone has the right to check their information and refuse to receive marketing communications.

### 6. Regular sources of the information

The data stored in the registry is attained from the customer e.g. by messages sent via web forms, e-mail, telephone, social media services, online open information, customer agreements, customer appointments and other situations in which a client delivers personal information.

## **7. Regular transfers of data and transfers of data outside the EU or the EEA**

The data is not regularly disclosed to other parties. The information may be published to the extent agreed with the customer. Data may also be transferred by the controller outside the EU or the EEA. Personal information is processed internally within the organization and is not shared for external use.

## **8. Registry security principles**

The registry shall be handled with utmost care and the data processed by the information systems shall be adequately protected. When registry information is stored on Internet servers, the physical and digital security of the hardware is adequately maintained. The controller shall ensure that the data stored, as well as the access rights to the servers and other information critical to the security of personal data, are treated confidentially and only by the employees whose job description includes processing the data.

## **9. The right of inspection and a right to request correction of the data**

Everyone in the registry has the right to check the information stored in the registry and to request the correction of any incorrect information or the completion of incomplete information. If a person wishes to check the data stored about him or her or request a correction to the information, the request must be sent electronically to the party representing the registrar [info@gravicon.fi](mailto:info@gravicon.fi). If necessary, the controller may ask the person to prove his or her identity. The controller will respond to the customer within the time limit set by the EU Data Protection Regulation (generally within one month).

## **10. Other rights related to the processing of personal data**

A person in the registry has the right to request the removal of his or her personal data from the registry ("the right to be forgotten"). The subjects of the data also have other rights under the EU's general data protection regulation, such as restrictions on the processing of personal data in certain situations. Requests should be sent electronically to [info@gravicon.fi](mailto:info@gravicon.fi). If necessary, the controller may ask the person to prove his or her identity. The controller will respond to the customer within the time limit set by the EU Data Protection Regulation (generally within one month).