Registry and Privacy Statement

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 1.9.2022.

1. Registry controller and contact person

Gravicon Oy, Sturenkatu 4, 00520 Helsinki, FINLAND.
Business ID: 0807661-6
Contact person: Pauli Jantunen, CEO, Gravicon Oy
pauli.jantunen@gravicon.fi

2. Suppliers privacy policy

We take care of securing your privacy and personal information in Modelspace service. This registry and privacy statement states, what data is collected into the register and how this data is used and which are the rights of the registrants to their data.

3. Name of the registry

Modelspace's Personnel Data Registry (includes User Data Registry and 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 develop Modelspace service, identification of users, correcting errors from the service, billing the client. The data is received primarily from the registrants themselves.

5. 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 is not 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, unless needed for the fulfillment of delivery contract.

6. Information content of the registry

The data of the registry may include username, person's name, occupation, company/organization, contact information (phone number, email, address), login information (dates, times), history of record changes. The information is kept for the time being.

7. Regular sources of the information

The data stored in the registry is attained in accordance with the rules. Data is gathered when the customer creates and modifies their user credentials. This can be done by Gravicon by customer orders. Data is also created, when user modifies his user data, when they login to the system, when they modify records and by the contact registry maintained by the customer.

8. Registry security principles

Cookies and local storage is used to identify the user and the remember the choices made by the user. The user can remove the cookies from their internet browser.

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 registrant (customers data protection officer or customers main user). If there are errors in the registered data, the registrant can ask the party representing the registrant for a correction.

A registered user has the possibility to check their data straight from the Modelspace service.

10. Right to be forgotten

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"). Then their data will be removed from the registry and user credentials to Modelspace service are removed. The request must be sent to the party representing the registrar.

Service provider will not respond to customers user inquiries, which concern registrants right, because contact registry is a system maintained by the customer. The party representing the registrant can ask the party representing the service provider for help to fulfill the inquiries relating to registrant rights.

11. Registry security principles

The registry is saved in an electronic format.
Only those employees of the service provider, who have due to their job description the right to handle user data, are allowed to use the user information registry. Each user have their own username and password to the Modelspace service. Data is stored in databases, which are secured with technical measures. Servers, where the databases are held, are kept in a physically secure space.

12. Updates to Registry and Privacy statement

Gravicon Ltd. updates the Registry and Privacy statement when needed. The newest version is published on Gravicon's website and registrants should check the statement regularly.