

# Key Management Register

## Privacy Policy

### Controller

Riihimäen kotikulma Oy (0592797-2)

Hämeenkatu 20

11100 Riihimäki

### Contact person for matters concerning the register

Sanna Eskelinen

sanna.eskelinen@riihimaki.fi

### Register

Key Management Register

### Date of preparation

2025-04-29

### Legal basis for processing

Agreement

### Purpose of processing personal data

The purpose of the register is to maintain the organization's B2B customer register, key management of customers and potential customers, and partners. The key is transferred against a transfer document signed by the customer/partner.

The data can be used to develop operations, for statistical purposes, and to produce more personalized, targeted content in our online services. Personal data is processed within the limits permitted and required by the Data Protection Regulation.

The information in the register can be used in the organization's own registers, for example, to target advertising without disclosing personal data to external parties. The organization may use partners to maintain customer and service relationships, in which case parts of the register data may be transferred to the partner's servers due to technical requirements.

The data is processed only to maintain the customer relationship of the controller organization through technical interfaces.

The organization has the right to publish the information contained in the customer register as an electronic or written list, unless the customer specifically prohibits it. In this case, the list refers to, for example, mailing labels for direct advertising or similar. The customer has the right to prohibit the publication of the information by notifying the controller's customer service, by email or to the contact person of the register.

### **Basis of legitimate interest**

If the processing is based on legitimate interest:

The controller's legitimate interest in processing the collected and used personal data is based on the freedom to conduct a business. The controller must process personal data in order to perform business-related tasks. In this context, the processing of personal data cannot necessarily be justified by a legal obligation or a contract with an individual.

In the balancing test, the controller has determined that legitimate interest is the most appropriate basis for processing in view of the nature, scope of the processing and the exercise of the rights and freedoms of the data subjects.

The controller has assessed that the activities carried out in accordance with the legitimate interest will not cause serious harm to the rights and freedoms of the individuals (data subjects).

### **Personal data categories concerned**

Customer personal data

Customer user data

## **Recipients and recipient groups**

The controller's staff and outsourcing partners (financial administration) where applicable.

## **Data content of the register**

The personal register contains the following information:

- The person's first and last name
- The person's personal identification number
- Email address
- Postal address
- Telephone number
- WWW address
- IP number
- Personal identification number
- Information on previous orders
- Login information in situations where the feature has been enabled for the customer.

## **Regular data sources**

Information is obtained from registrations made by the customer and notifications made by the customer during the customer relationship. Updates of name and contact information are also obtained from authorities and companies that provide update services.

Information can also be obtained from subcontractors who are related to the use or production of the service.

Information about other activities of customers in the digital environment can be obtained from partner websites, information systems or other digital sources that are logged in via an electronic invitation, via cookies or using the codes given to customers.

The information in the customer register is only for the use of the organization, except when using an external service provider to provide a value-added service or to support a credit decision.

The information is not disclosed outside the organization or for the use of its partners, except in matters related to a credit application, debt collection or invoicing, and when required by law. The personal data of the registered person is destroyed at the user's request unless legislation, open invoices or debt collection activities prevent the deletion of the information.

### **Retention period for personal data**

10 years from the end of the customer relationship.

### **Regular disclosure of information**

The information in the customer register is only for the use of the organization, except when using an external service provider to provide a value-added service or to support a credit decision.

The information is not disclosed outside the controller or for the use of its partners, except in matters related to a credit application, debt collection or invoicing, and when required by law.

The personal data of the registered person is destroyed at the user's request unless legislation, open invoices or debt collection activities prevent the deletion of the information.

### **Transfer of data outside the EU or EEA**

Registered data is not routinely transferred outside the EU.

ai outside the EEA. However, it is possible that service providers outside the EU/EEA are used in the processing or that the service providers' clouds are located outside the EU/EEA, in which case the SCC standard clauses are used as the basis for the data transfer and additional safeguards have been implemented in the data transfers, such as internal instructions (on pseudonymisation of personal data and the like) and possibly a TIA analysis if the situation requires it.

When the organisation processing personal data has committed to the EU-US Data Protection Framework (DPF), this will be used as the basis for the transfer during its validity.

### **Principles of register protection A: Manual material**

Contact information collected in customer transactions and other documents containing customer data that are manually processed are stored in locked and fire-proof storage facilities after initial processing.

Only designated employees who have signed a confidentiality agreement are entitled to process manually stored customer data.

The protection and processing of the data in the register complies with the provisions and principles of the Data Protection Act, the regulations of the authorities and good data processing practice.

### **Principles of register protection B: Electronic material**

Only designated employees of the organization and companies acting on its behalf have the right to use the customer owner and customer register and maintain its information. Each designated user has their own personal username and password.

Each user has signed a confidentiality agreement.

The system is protected by a firewall that protects external contacts to the system.

The protection and processing of the data in the register complies with the provisions and principles of the Data Protection Act, the regulations of the authorities and good data processing practice.

### **Cookies**

We use cookies on our website. A cookie is a small text file that is sent to and stored on the user's computer. Cookies do not harm users' computers or files. The primary purpose of using cookies is to improve and customize the visitor's user experience on the website and to analyze and improve the functionality and content of the website.

The information collected using cookies can also be used to target communications and marketing and optimize marketing activities. A visitor cannot be identified using cookies

alone. However, information obtained using cookies can be linked to information that may have been obtained from the user in other contexts, for example when the user fills out a form on our website.

Cookies collect the following information:

- visitor's IP address
- time of visit
- pages viewed and page viewing times
- visitor's browser

### **Your rights**

A user visiting our website has the option to block the use of cookies at any time by changing their settings in the cookie banner. Some browser programs also allow you to disable the cookie function and delete cookies that have already been saved.

Blocking the use of cookies may affect the functionality of the website.

### **Automatic processing and profiling**

The personal data processed is not subject to profiling or automatic processing.

### **Right of inspection, i.e. the right to access personal data**

The data subject has the right to check what information is stored about him or her in the register. A request for inspection must be made in writing by contacting the data controller's customer service or the contact person for the register in Finnish or English. The request for inspection must be sent from a verifiably identifiable email address.

The data subject has the right to prohibit the processing and disclosure of their data for direct advertising, distance selling and direct marketing, as well as for market and opinion research by contacting the data controller's customer service point.

### **The right to transfer data from one system to another**

The data subject has the right to transfer their own data from one system to another.

The transfer request must be made from an identifiable email address to the data controller's contact point.

### **The right to demand correction of data**

Incorrect, unnecessary, incomplete or outdated personal data in the register, in terms of the purpose of the processing, must be corrected, deleted or supplemented.

A correction request must be made from an identifiable email address to the data controller's contact point.

The request must specify what data is required to be corrected and on what basis. The correction will be carried out without delay.

The person from whom the incorrect data was received or to whom the data was disclosed will be notified of the correction of the error.

If a request for rectification is denied, the person responsible for the register will issue a written certificate stating the reasons for the denial. The interested party may refer the denial to the Data Protection Ombudsman.

### **Right to restriction**

The data subject has the right to request restriction of data processing, e.g. if the personal data in the register are incorrect. Contact the person responsible for the register.

### **Right to object**

The data subject has the right to request personal data concerning him or her and the data subject has the right to request correction or deletion of personal data. Requests must be made from an identifiable email address to the contact point of the data controller.

If you act as a contact person for a company or organization, your data cannot be deleted during this period.

### **Right to lodge a complaint with a supervisory authority**

If you believe that the processing of personal data concerning you has violated the Data Protection Regulation, you have the right to lodge a complaint with a supervisory authority.

You can also file a complaint in the Member State where you have your permanent residence or place of work.

The contact details of the national supervisory authority are:

Office of the Data Protection Commissioner

Visual address: Lintulahdenkuja 4, 00530 Helsinki

Postal address: P.O. Box 800, 00531 Helsinki

Telephone: 029 566 6700

Library: 029 566 6768

tietosuoja@om.fi

[www.tietosuoja.fi](http://www.tietosuoja.fi)

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

The data subject has the right to prohibit the disclosure and processing of his or her data for direct advertising and other marketing purposes, to demand the anonymization of the data where applicable, and to have the right to be completely forgotten.