

## Avantopool Oy's privacy statement

According to the General Data Protection Regulation, the controller has an obligation to provide clear information to data subjects. This privacy statement has been drawn up to comply with this obligation.

### 1. Controller

Avantopool Oy

Contact information:

Finnoonlaaksontie 7  
02270 Espoo, Finland

Contact information in matters involving the data file

Avantopool Oy / Juha Kiukas  
Finnoonlaaksontie 7  
02270 Espoo, Finland  
Tel. +358 50 468 7920  
juha.kiukas@avantopool.com

Contact details of the Data Protection Officer, where applicable:

Avantopool Oy / Juha Kiukas  
Finnoonlaaksontie 7  
02270 Espoo, Finland  
Tel. +358 50 468 7920  
juha.kiukas@avantopool.com

### 2. Data subjects

Avantopool Oy's data file stores data on

- Potential customers who have asked for or received a quotation from Avantopool Oy
- Customers who have purchased products from Avantopool Oy
- Avantopool Oy's existing and potential suppliers
- Avantopool Oy's existing and potential partners
- Individuals and companies who have left their contact details with Avantopool Oy at customer events, fairs or negotiations, or in surveys or sales situations

### 3. Grounds and purpose for keeping the file

Personal and/or company data is processed on the basis of a customer, supplier or cooperation relationship with the data subject. The individuals or corporations registered in the file have given their consent for the registration either verbally or in writing. Providing contact details to Avantopool Oy by e-mail or with the contact form on the website is considered to constitute consent, as is giving a business card or other personal data to an employee of Avantopool Oy at a meeting.

### **Purpose of processing personal data and keeping the file**

Personal data is only processed for predetermined purposes, which are:

- Management of customer relations
- Providing information on products and development
- Ensuring product warranties and successful maintenance
- Purchasing services from suppliers and partners
- Notifying important contacts of the development of Avantopool Oy and its products

## **4. Personal data saved in the file**

The customer data file contains the following information:

Contact information

- Name
- Address
- E-mail
- Telephone number
- Possible organisation represented by the individual

Customer information

- Details of purchased products/services
- Details of offered products/services
- Prices and discounts of purchased services

## **5. Rights of the data subject**

Data subjects have the following rights, and requests for exercising them should be addressed to

Avantopool Oy / Juha Kiukas  
Finnoonlaaksontie 7  
02270 Espoo, Finland  
juha.kiukas@avantopool.com

### **Right of access**

Data subjects have the right to inspect the personal data we have stored on them.

### **Right to rectification**

Data subjects have the right to request the rectification of inaccurate or incomplete data concerning them.

### **Right to object**

Data subjects who feel that their data has been processed illegally have the right to object to the processing of their personal data.

**Direct marketing prohibition**

Data subjects have the right to prohibit the use of their data for direct marketing purposes.

**Right to erasure**

Data subjects have the right to request the erasure of data if their processing is not necessary. We will process the request for erasure and either erase the data or provide a justified reason for which the data cannot be erased.

It should be noted that the controller can have a statutory or other right not to erase the requested data. The controller is obligated to store accounting materials for the period of time (10 years) specified in the Accounting Act (Chapter 2, section 10). For this reason, materials related to accounting cannot be erased before the expiration of this period.

**Withdrawal of consent**

If the processing of personal data concerning the data subject is based solely on consent and not grounds such as a customer relationship or membership, the data subject is free to withdraw the consent at any time.

**Data subjects can file a complaint on decisions to the Data Protection Ombudsman**

Data subjects have the right to demand that we limit the processing of the disputed data until the matter has been resolved.

**Right of appeal**

Data subjects have the right to file a complaint with the Data Protection Ombudsman if they feel that we are violating the currently valid data protection legislation in our processing of our personal data.

Contact details of the Data Protection Ombudsman: <https://tietosuoja.fi/en/contact-information>

**5. Regular sources of data**

Customer data is regularly obtained from:

- customers, suppliers or partners themselves at the beginning of the customer/supplier relationship; or
- from the customers themselves via the online form.

**6. Regular disclosures of data**

As a rule, Avantopool Oy does not disclose data to third parties for marketing purposes.

**7. Duration of processing**

As a rule, the data stored in our file is processed for as long as the company remains in existence or until the data is erased from the file by either the customer or Avantopool Oy.

- Data subjects can opt out of our marketing list through the link contained in each marketing e-mail sent by us.

## **8. Processors of personal data**

The file is processed by the employees of Avantopool Oy. We have outsourced our accounting and IT support services, so the employees of our partners may potentially gain access to certain data from the file in connection with their work.

The personal data is processed by the controller and its employees. We may also partially outsource the processing of personal data to a third party, in which case we will make contractual arrangements to ensure that the personal data will be processed appropriately and in accordance with currently valid data protection regulation.

## **9. Transfer of data outside the EU**

The personal data will not be transferred outside the EU or the European Economic Area.

## **13. Automated decision-making and profiling**

We do not use the data for automated decision-making or profiling.