

DATA PROTECTION NOTICE

1 GENERAL

The purpose of this notice is to provide privacy information required by the EU General Data Protection Regulation (hereinafter "GDPR") to both the data subject i.e. the data controller's client and to the supervisory authority.

2 DATA CONTROLLER AND CONTACT DETAILS

Convergens Oy acts as the controller in accordance with this data protection notice.

The contact person of the data controller is Juho Junkkari.

Address: Ahventie 4, 02170 Espoo

Email: fina@convergens.fi

3 NAME OF THE REGISTER

The name of the register is Convergens' client and marketing register.

The register covers Convergens' clients, prospective clients, and other parties, who receive marketing material.

4 PURPOSE AND LEGAL BASIS FOR PROCESSING PERSONAL DATA

The following table provides a summary of the purposes and the applicable legal basis for the use of personal data. A detailed description of the contents of the stored categories of personal data is available in section 5.

| Purpose of Use | Legal Basis | Categories of Personal Data |
|---|---|---|
| Providing and developing services | The legitimate interest of the data controller, fulfilment of a contract. | Basic information, Client information, Consents and prohibitions. |
| Maintaining a client relationship, including providing information about trainings, current topics and events | The legitimate interest of the data controller, fulfilment of a contract | Basic information, Client information, Consents and prohibitions, Client event details, Analytics and modelled information, Data from websites and electronic notices |

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|---|--|---|
| Client satisfaction and market surveys | The legitimate interest of the data controller | Basic information, Client information, Consents and prohibitions, Analytics and modelled information, Data from websites and electronic notices |
| Client acquisition and direct marketing | The legitimate interest of the data controller | Basic information, Client information, Consents and prohibitions, Client event details, Analytics and modelled information, Data from websites and electronic notices |
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5 CATEGORIES OF PERSONAL DATA

The table below defines the categories of personal data

| Category of personal data | Information content of the group |
|---|--|
| Basic information | Name and contact details (email, telephone number, addresses) of the natural person (data subject), age, title, employment and other connections in business life. |
| Client identification information | The client identification information required by legislation, such as the necessary information to identify the client and to determine the client's financial status and political influence. |
| Client information | The information regarding the contractual relation between the party and Convergens and the information regarding the communication between the parties as well as the information enabling the automatic archiving of the communication. |
| Consents and prohibitions | The consents and prohibitions given by the data subject for different purposes of processing of personal data. |
| Client event information | The tasks related to the managing of a client relationship and client events as well as the information needed to organise them. |
| Analytics and modelled information | The information refined or acquired by Convergens, which are used to improve, execute and govern the business operations. |
| Data from websites and electronic notices | Monitoring the online behaviour of a person in the website of Convergens and monitoring the use of services e.g. by means of cookies. The information collected may include, for example, the browsed page and visited pages of the user, network provider, IP |

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|--|--|
| | <p>address, location of the user, session ID, time and duration of the session, device model, unique device and/or cookie identifier, device operating system, screen resolution, channel (such as an application, a mobile browser or an internet browser) and the version of the web browser. The information collected from email notices include the reading of the notices, amount of openings, the time of the openings, opened links and the user IP address.</p> |
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6 RECIPIENTS AND GROUPS OF RECIPIENTS OF PERSONAL DATA

Personal data is not disclosed to third parties.

7 TRANSFERING PERSONAL DATA

The data controller uses subcontractors in the processing of personal data. Personal data processed by subcontractors is not transferred outside of the EU or the EEA.

Personal data may be transferred to subcontractors for the purposes of e.g. updating contact information.

8 DATA RETENTION

The necessity of retaining client's and prospective client's personal data for sales and marketing purposes, as well as the data's correctness, is reviewed annually.

Unnecessary and outdated data will be erased in accordance with the reviewing of the data's correctness, and also at other times when deemed necessary.

9 SOURCES OF PERSONAL DATA AND UPDATING

Personal data is collected from the data subject itself and also when the data subject uses the services of the data controller. Based on its own clearance made by Convergens, individuals may be added to the register, when the individual belongs to a group of people to which marketing actions will be allocated.

Personal data may also be collected and updated based on emails sent by the data subject to the personnel of Convergens.

Personal data may also be collected and updated from third party registers, such as

- Suomen Asiakastieto Oy, Talouselämä and Bisnode Finland Oy

- Other partners, service providers and networks providing contact information for user groups

10 RIGHTS OF THE DATA SUBJECT

The data subject has the right to receive confirmation from the data controller as to whether or not personal data concerning the data subject are being processed, or whether personal data has been processed.

The data subject is entitled to receive a copy of the processed personal data and the personal data undergoing processing.

Whether the data subject makes the request by electronic means and he or she has not requested it by any other means, the information shall be provided by electronic means. The data subject has also the right to obtain from the controller the rectification or erasure of personal data concerning him or her and the data subject has the right to prohibit the processing of personal data for direct marketing purposes.

In certain cases, the data subject has also the right to request from the controller restriction of processing of personal data or otherwise object to processing. Furthermore, the data subject may require the transmission of the personal data, which he or she has provided to the controller in a machine-readable format based on the GDPR.

All requests mentioned here shall be provided to the above-mentioned contact person of the controller.

Whether the data subject finds the processing of his or her personal data unlawful, he or she has the right to lodge a complaint with a supervisory authority.

11 RIGHT TO WITHDRAW CONSENT

Where processing of personal data of the data subject is based on consent, the data subject shall have the right to withdraw his or her consent. However, the withdrawal of consent may affect the usability and functionality of the service in question. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

12 THE PROTECTION OF THE REGISTER

The location and protection of the equipment for storing documents has been carefully maintained and the documents are stored in a secured space. The access control at the premises has been appropriately arranged.

The right to access to the documentation is within the personnel of Convergens, who have the obligation of confidentiality.