

DATA FILE DESCRIPTION

Toppi Oy's customer data register that is compatible with personal data act (523/1999) 10§ and 24§ and EU General Data Protection Regulation ((EU)2016/679).

1. FILE CONTROLLER

Oy Toppi Ab (Business ID 0101159-6)

Contact information:

Tiilismäki 9

02320 Espoo

info@toppi.fi

2. PERSON/CONTACT RESPONSIBLE FOR FILE MATTERS OR CONTACT

Oy Toppi Ab

Tiilismäki 9

Phone +358207589824

info@toppi.fi

3. NAME OF DATA FILE

Toppi Oy's customer data file

4. PURPOSE OF THE PROCESSING OF DATA

The purpose of processing personal data is to manage and maintain customer relationship or partnership between the company represented by the registered person and Toppi Oy. Personal data will only be used for communication between Toppi Oy and its stakeholders.

5. INFORMATION CONTAINED IN THE DATA FILE

We collect the following personal information to the register

- First and last name
- Position in the company
- Phone number
- Email address
- Personal information provided by the customer, such as interests
- Contents of email and phone conversations

6. REGULAR SOURCES OF DATA

We collect personal information directly from the people in the register, or from members of the same organization to which the registered person belongs to. Contact information for new customers and prospects can also be searched and collected from the internet.

7. REGULAR TRANSFER OF DATA TO THIRD PARTY MEMBERS

Our partners and subcontractors may process your personal data as part of our processes related to customer management and administration tasks. Our partners and subcontractors are for example:

- Information and communication system providers
- Financial and payment service providers
- Logistics service providers

We always ensure that our partners and contractors do not process any personal data for any other purpose than what they are authorized and that their processes meet the appropriate level of security. Our partners and contractors are committed to follow an on-disclosure agreement when handling personal data and documents on behalf of Toppi Oy.

8. REGULAR TRANSFERS OF DATA OR TRANSFERS OF DATA OUTSIDE EU OR EEA

Data will not be transferred to any entities outside EU or EEA, and all our data is processed within EU and EEA.

9. PRINCIPLES FOR DATA RETENTION

Personal data will be retained for as long as is necessary for the purpose they were collected for, or if we are legally obligated or until we receive a request for erasure. After the customer relationship has ended data will be stored for a maximum of six years after the end of the calendar year based on accounting law, income tax law and money laundering law.

10. PRINCIPLES FOR THE PROTECTION OF THE DATA FILE

Processed personal data is stored in to our information systems and is accessible only to personnel who need this information to perform their duties. Every member of staff has personal usernames and passwords, and access to information systems is limited so that unauthorized people can not access personal information. Passwords are exchanged at regular intervals and the level of security is checked regularly by internal audits.

Toppi Oy's own internal network is closed from unauthorized access and external connections are protected by firewalls and other technical measures. When staff members operate outside the office VPN software is used to connect to Toppi Oy's network to ensure network security. All computers and devices are equipped with an up-to-date antivirus program.

11. THE RIGHTS OF THE DATA SUBJECT

You have the right, according to the General Data Protection Regulation, to:

- receive information about the handling of your personal data
- receive access to your own personal information and inspect the information we handle
- request to correct inaccurate information and supplement existing information
- request to erase all your personal information.
- receive your personal information in a structured, commonly used and machine-readable format and have the right to transmit that data to another data controller provided you have granted that information to us.
- request to restrict the processing of your personal data

To exercise your right of access you must issue a data access request to the contact provided in paragraph two or personally at the Toppi Oy premises. We may ask you to specify your request in writing and verify your identity before we process the request. We may also refuse to process the request on the basis of applicable law.

You have the right to file a complaint to the supervising authority in Finland or to the authority of your home EU country, where your place of residence or work is located, should you determine we have not processed your information according to the GDPR act.

12. DATA CONTROLLER RESPONSIBILITIES

The data controller shall without delay, from their own initiative, or at the request of the registered subject rectify, delete or supplement the data contained in the register, if that data is incorrect, unnecessary, incomplete or outdated.

The request to access or modify data is filed at the company premises or a written request can be sent to the contact information provided above. The identity of the person filing the request can be verified with a valid ID.

13. DIRECT MARKETING CONSENT

According to the personal data act 30 § a data subject has the right to prohibit a controller from processing data about himself for direct mail and other direct marketing purposes.