



# Privacy Statement

## Privacy Statement

The purpose of this privacy statement is to describe the practices of Etra Oy with respect to collecting, processing, protecting and storing of personal data. The privacy statement further describes the collecting of cookies and the rights of customers, suppliers and other cooperation partners.

### Collecting of personal data

Personal data is such data, which may be either directly or indirectly connected to a person.

Etra Oy collects personal data only for a specified legal purpose and does not use the data at a later time for any other purposes.

Register form descriptions are available at <http://www.etra.fi/fi/Yritys/tietosuoja/>

Etra Oy collects the following personal data:

- Basic information: [First name, family name, title or role in company, address, phone number, e-mail address, sales and purchase history]
- Information related to the customer relationship, such as information related to orders and services, invoicing, payments and credit ratings, marketing licenses and bans, customer references and e-mails.
  - Information generated when providing services, such as information on the forwarding of e-mails, calls and personal data contained in references.
- Other information that describe the use of the service such as information collected by cookies or similar when visiting the website.
- Information related to the recognition of the customer, such as logging information (excluding passwords)
- Other information specified and collected in connection with the data subject's consent

### Processing of personal data

In the processing of personal data, the Finnish legislation currently in force, the EU General Data Protection Regulation and other instructions and regulations given by the authorities are followed.

Personal data is be processed in accordance with the relevant laws and in a way that is appropriate and transparent. Personal data retained in the personal data file is appropriate, essential and restricted to what is necessary to fulfill the purpose for which the data is processed.

All stored personal data is accurate and up to date. The information is updated as necessary. Every possible and reasonable action is be undertaken with regard to personal data in order to delete or correct inaccurate or erroneous personal data without undue delay.

Personal data is stored for only as long as it is necessary for carrying out the purposes of data processing.

Personal data is processed in a way and protected by appropriate technical or organizational measures that ensure the proper security of the personal data, including protection against

unauthorized and unlawful processing, disappearance, destruction or damaging occurring by accident.

Personal data is processed only by the appropriate persons of Etra Oy the subcontractor and the cooperation partners. The employees of Etra Oy the subcontractors and the cooperation partners are subject to non-disclosure agreements or confidentiality obligations regarding the personal data. Access rights to data systems containing personal data are constantly maintained and monitored.

## Use of personal data

Etra Oy collects and processes personal data that is used in business operations, customer service, collaboration with suppliers and in appropriate commercial actions.

The processing of personal data is usually based on an agreement entered into with Etra Oy or on a legitimate cause. The processing of personal data may also be based on other grounds, such as consent or legislation.

Etra Oy processes personal data for the following purposes:

**Carrying out services and maintaining customer relationships:** Service and collaboration require the processing of customers', suppliers' and cooperation partners' personal data for the purposes of identifying the users, processing and delivering orders, purchasing services, invoicing, controlling credits, collecting charges, customer service, solving failures and defects, and handling claims and complaints. In addition, personal data is used for customer communication, notifications related to services and contacting customers and suppliers as required by business operations.

**Sales and marketing:** The data file of customer data is used and processed for marketing purposes, for example, in order to define target groups for marketing. The use and processing of the data in the data file is always within the limits of the legislation in force. Personal data may also possibly be used for targeted offerings of services and personalization.

**Development and analyzing:** Personal data is processed internally in order to develop our products, services, processes, customer relationships and business operations.

**Data security and abuse of personal data:** Personal data may also be processed in order to attend to the data security of our services and to discover and prevent abuse and fraud as necessary.

**With regard to court proceedings or upon request of an authority** pursuant to applicable law or court order, in connection with a trial or a process in the authority. The data may also be submitted to a competent authority such as the police or emergency authority to the extent provided by law.

**In business transactions** such as mergers and different kinds of asset purchases and transfers.

**For other purposes to which consent has been received:** Personal data may also be processed for other purposes to which the person has given their consent.

In all of the above mentioned situations the personal data is processed only within the scope required by the purpose of the processing and the protection of privacy of the person concerned is considered.

In Etra Oy personal data is processed only for a predetermined purpose. Data collected from different services for the same purpose may be combined, as necessary. Personal data is never processed in a way that is unsuitable with respect to the determined purpose of processing.

## Use of cookies

Like many websites, also Etra Oy website uses cookies. Cookies allow the owner of the website to discover the most popular sections of the website, visited websites and visiting times. The collected data is used, for example, to offer, develop and analyze services and for targeted marketing in the data networks of Etra Oy or its cooperation partners.

The storage of cookies may be prevented by changing the browser settings, which may in some cases cause the browsing of the website to slow down or block access to some websites.

Data collected through cookies is typically used for the following purposes:

**Functional cookies and service production:** Cookies are essential as regards the functioning of websites and online services and they ensure a smooth user experience. For example, user account information, passwords and personalization settings do not have to be inserted with every log-in.

**Service development:** By monitoring the use of cookies the functioning of websites and online services may be improved. Information is obtained of, for example, the most popular sections of the website, user orientation, visiting lengths and website visited by the user prior to this website .

**Analyzing:** Cookies are used for statistic monitoring of attendance of websites and of online services, and for calculating the effectiveness of advertising. Data may be collected from, for example, marketing e-mails and newsletters in order to find out whether the messages have been opened and whether any actions have been taken on the basis thereof, such as website visits.

**Targeted marketing:** Cookies also allow the collecting of data for the purpose of producing targeted advertising or content by creating different target groups.

The data obtained by using cookies may, within the limits allowed by legislation, possibly be combined with data obtained elsewhere, for instance in connection with the use of services.

## Storing of personal data

Personal data is stored in the data systems of Etra Oy, some of which are created in collaboration with subcontractors. The cooperation partners of Etra Oy are system providers and they process personal data on behalf of Etra Oy on the basis of a written assignment. These third parties may not use the personal data for any other purpose than to provide the service agreed with Etra Oy. When using subcontractors the subcontractors are obliged to ensure that the processing of personal data is performed in accordance with this Privacy Statement. All personal data is returned or deleted permanently by the subcontractors once the processing assignment is complete.

The subcontractors that process personal data on behalf of Etra Oy may be located in Finland or elsewhere in the European Union. Personal data may in some cases also be processed outside the European Economic Area, but the customer's consent shall always be obtained in such cases. We nevertheless ensure and obligate our cooperation partners to process personal data in accordance with the legislation in force.

Personal data is stored only for as long as it is necessary for the needs and purposes described in the Privacy Statement, unless otherwise stated in law. Outdated or unnecessary data is not stored



and we seek to ensure that any personal data or other customer and supplier data is up to date and correct.

## Securing of personal data

Etra Oy constantly works to secure the rights of persons and ensures the security of personnel, information, data systems, internal and common communication networks, and of offices and utility services rooms.

In order to ensure the safety of personal data, Etra Oy surveys potential threats, considers possible risks to the protection of privacy and business operations, and surveys technical possibilities to enhance security. The above mentioned measures are taken in accordance with applicable legislation, regulations given by the authorities, and contractual obligations.

## The rights of a person

Pursuant to legislation, a person has the right to

- Check whether his or her personal data is being processed and whether the processing is compliant with the legislation in force. An inspection may be initiated by contacting Etra Oy management in charge of data protection/contact person in data protection matters (see contact information below).
- Obtain information about the personal data being processed.
- Request correction or deletion of incorrect, unnecessary, insufficient or outdated personal data.
- Prohibit the use of personal data for the purposes of direct marketing and market or opinion polls.
- Prohibit publishing and transferring of personal data and contact information for contact information services.
- Cancel the consent to process personal data when processing is based on consent.

If personal data is deleted from the systems, the following services may not necessarily be provided to the person:

- Deliveries
- Customer service

Should the person consider that Etra Oy's actions violate this Privacy Statement or the current legislation in force, the person has the right to file a complaint. The complaint may also be filed to the Finnish Data Protection Ombudsman or to the Finnish Communications Regulatory Authority. Contact information regarding the filing of a complaint can be found at the end of this Privacy Statement.

## Contact information:

Etra Oy is a part of Etola Group. With respect to matters relating to the processing of personal data or the Privacy Statement please contact the Etola Group data protection management:

Tony Sandberg, Chief of ICT-infrastructure, Etola Group  
tony.sandberg@etola.fi  
tel. +358 408283035