

NORDIC SALES CREW OY'S PRIVACY POLICY AS THE CONTROLLER

(updated on 24.9.2018)

This Nordic Sales Crew Oy's (hereinafter Nordic Sales Crew Oy may also be referred to as "we" or "us") privacy policy describes the personal data processing activities of Nordic Sales Crew Oy as the controller (hereinafter "**Privacy Policy**"). This Privacy Policy contains Nordic Sales Crew Oy's records of processing activities as the controller, and it also acts as a communication from us to our data subjects (hereinafter our data subjects may also be referred to as "you" or "your") through which we inform the data subjects of the ways Nordic Sales Crew Oy processes their personal data. Thus, this Privacy Policy contains at least the information that Articles 13, 14 and 30 of the EU's General Data Protection Regulation (679/2016) (hereinafter "**GDPR**") require of us.

We also act as the processor for the personal data we process on behalf of our customers when they use our sales services. When we process that personal data on behalf of our customers, we apply the practices that are described in Sections 14 and 15 below. Otherwise we comply with the provisions of each relevant data processing agreement.

Nordic Sales Crew Oy aims to ensure that this Privacy Policy is always publicly, transparently and easily available at Nordic Sales Crew Oy's websites.

1) CONTROLLER

Name: Nordic Sales Crew Oy

Business ID: 2758082-6

Address: Unioninkatu 7, 00130, Helsinki

2) PERSON IN CHARGE OF DATA FILES

Name: Mathias Dahlqvist

Contact details: +358 (0) 44 0500 531, mathias.dahlqvist@nordicsalescrew.com

3) CATEGORIES OF DATA SUBJECTS

Nordic Sales Crew Oy's Privacy Policy as the controller concerns the following categories of data subjects:

- visitors of our website (hereinafter "**Visitors**");
- contact persons of our customers (hereinafter "**Customers**");
- contact persons of our potential customers (hereinafter "**Potential Customers**");
- our shareholders;
- our employees;
- our jobseekers; and
- persons who contact us through email or other similar means (hereinafter "**persons who contact us**").

4) CATEGORIES OF PERSONAL DATA

The data files concerning Visitors may contain the following categories of personal data:

- IP-addresses.

The data files concerning Customers and Potential Customers may contain the following categories of personal data:

- contact information, such as full name, address, phone numbers, e-mail addresses and personal identification numbers;
- nationality, age, gender, title or profession and language skills;
- possible registration information, such as username, pseudonym, password and other unique identification; and
- possible other information data subject discloses to us.

The data files concerning our shareholders, employees and jobseekers may contain the following categories of personal data:

- contact information, such as full name, address, phone numbers, e-mail addresses and personal identification numbers;
- videos and pictures;
- nationality, age, gender, title or profession and language skills;
- other information derived from the CVs, such as the work experience, educational background and other such skills;
- bank account data;
- possible registration information, such as username, pseudonym, password and other unique identification;
- information relating to the implementation of communications and information relating to use of services, such as browsing and search information; and
- possible other information data subject discloses to us.

The data files concerning persons who contact us may contain the following categories of personal data:

- contact information, such as full name, address, phone numbers, e-mail addresses and personal identification numbers;
- information relating to the implementation of communications and information relating to use of services, such as browsing and search information; and
- possible other information data subject discloses to us.

5) PURPOSE OF THE PROCESSING OF PERSONAL DATA

Personal data of Visitors can be handled for the following purposes:

- for improving our website; and
- analysis and statistics.

Personal data of Customers and Potential Customers can be handled for the following purposes:

- management and development of the customer relationship;
- customer service;
- marketing;
- to enable us to comply with our legal and regulatory obligations; and
- analysis and statistics.

Personal data of our shareholders, employees and jobseekers can be handled for the following purposes:

- management and development of the employee and jobseeker relationships;
- to use our employees in the services we provide to our customers;
- management of employment contracts and other related matters;
- to enable us to comply with our legal and regulatory obligations; and
- analysis and statistics.

Personal data of persons who contact us can be handled for the following purposes:

- customer service;
- improving customer experience;
- to enable us to comply with our legal and regulatory obligations; and
- analysis and statistics.

6) LEGAL BASIS FOR PROCESSING

We have a right to process personal data of Visitors based on the:

- legitimate interests pursued by us, as it is necessary for us to process cookie data to improve our website so we can stay in business; and/or
- under the Finnish Act on Electronic Communications Services, we are allowed to process cookie data due to implied consent.

We have a right to process personal data of Customers based on the:

- performance of a contract between us and our customers; and
- legitimate interests pursued by us, as we need to market our services to keep us in business.

We have a right to process personal data of Potential Customers based on the:

- legitimate interests pursued by us, as we need to market our services to potential customers to keep us in business.

We have a right to process personal data of our shareholders based on the:

- legitimate interests pursued by us, as it is necessary for us to process personal data due to our administrative tasks; and
- legal obligation to which we are subject as a limited liability company.

We have a right to process personal data of our employees based on the:

- performance of an employment contract;

- legitimate interests pursued by us, as it is necessary for us to process personal data due to the employment relationship; and
- legal obligation to which we are subject as the employer.

We have a right to process personal data of our jobseekers based on the:

- legitimate interests pursued by us, as it is necessary for us to process the personal data to evaluate the jobseekers and potential employment relationships.

We have a right to process personal data of the persons who contact us based on the:

- legitimate interests pursued by us, as it is necessary for us to process personal data to handle the contacts made to us.

The legal basis for processing may however change. Such a change may result from e.g. our arising legal obligation to hold on to personal data.

7) REGULAR SOURCES OF INFORMATION

Information regarding the data subject are regularly gathered:

- from data subjects themselves via phone, internet, e-mail or in other similar fashion;
- with cookies and other similar tech;
- by Nordic Sales Crew Oy's other affiliate companies; and
- from the Population Register Center/Population Information System, Posti's address database, phone companies' databases and other similar private and public registries.

8) PERIOD FOR WHICH THE PERSONAL DATA WILL BE STORED

8.1) We shall retain only the necessary data of the contact persons of our customers for a period of three (3) years following the end of customer relationships.

8.2) We shall retain only the necessary data of contact persons of our potential customers for a period of two (2) year following collection of the data, if the potential customers have not turned into our actual customers.

8.3) We shall retain only the necessary data of our current and former shareholders for indefinitely, as we are required to do under the applicable law.

8.4) We shall retain only the necessary data of our employees for a period of ten (10) years following the end of their employment in our company, because we have a legal obligation to provide our former employees with references during that period.

8.5) We shall not retain the data of our jobseekers, who were not employed by us, if the data subjects do not explicitly give us their consent to do so. Having received such a consent, we may retain only the necessary data of the data subjects for a period of six (6) months following explicit consent.

8.6) We shall retain only the necessary data of persons who contact us for a period of one (1) year following the contact.

8.7) However, we may retain the data of all data subjects for longer than is described above, where we are required to do so by law, it is necessary due to legal proceedings and it is necessary for any similar reason. We shall be careful not to apply this Section in vain.

8.8) We inspect the necessity of the personal data stored regularly and keep records of the inspections.

9) CATEGORIES OF RECIPIENTS OF PERSONAL DATA

The recipients of personal data may consist of the following categories:

- Nordic Sales Crew Oy's affiliate companies;
- parties who offer cloud services;
- parties who offer accounting and auditing services;
- parties who help Nordic Sales Crew Oy to fulfill its legal obligations; and
- Nordic Sales Crew Oy's customers.

10) INFORMATION TRANSFER OUTSIDE OF EU OR THE EUROPEAN ECONOMIC AREA

Personal data is not transferred to third countries.

11) DATA SUBJECTS' RIGHTS

The data subject has a right to use all of the below mentioned rights.

The contacts concerning the rights shall be submitted to the person in charge of the data file stated in Section 2. The rights of the data subject can be put into action only when the data subject has been satisfactorily identified.

Right to inspect

Having presented the adequate and necessary information, the data subject has the right to know what, if any, data the controller has stored of her/him. While providing the requested information to the data subject, the controller must also inform the data subject of the controller's regular sources of information, to what are the personal data used for and where is it regularly disclosed to.

Right to rectify and erasure

The data subject has a right to request the controller to rectify the inaccurate and incomplete personal data concerning the data subject.

The data subject can request the controller to erase the personal data concerning the data subject, if:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the data subject withdraws consent on which the processing is based on;
- the personal data have been unlawfully processed; or

- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

Let it be known that the data subjects' rights to rectify and erase data does not concern the data which the controller must retain due to its legal obligations.

If the controller does not accept the data subject's request to rectify or erase the personal data, it must give a decision of the matter to the data subject in a written form. The decision must include the reasons for which the request was not granted. The data subject may refer the matter to the relevant authorities (the Data Protection Ombudsman in Finland).

The controller must inform the party to whom the controller has disclosed the personal data to or has received the personal data from of the rectification or erasure of personal data. However, there is no such obligation where the fulfilment of the obligation would be practically impossible or otherwise unreasonable.

Right to restriction of processing

The data subject can request the controller to restrict the processing of the personal data concerning the data subject where one of the following applies:

- the accuracy of the personal data is contested by the data subject for a period, enabling the controller to verify the accuracy of the personal data;
- the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead; or
- the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims.

If the controller has based the restriction of the processing of personal data on the abovementioned criteria, the controller shall give a notification for the data subject before removing the restriction.

Right to object

Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning her/him for such marketing, which includes profiling to the extent that it is related to such direct marketing.

Right to data portability

The data subject shall have the right to receive the personal data concerning her/him, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where the processing is based on consent.

Automated individual decision-making, including profiling

The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

However, the data subject shall not have the aforementioned right if the decision is:

- necessary for entering into, or performance of, a contract between the data subject and us;
- is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or
- is based on the data subject's explicit consent.

Right to withdraw consent

Where the legal basis for the processing of personal data is the consent of the data subject, the data subject shall have the right to withdraw her/his consent.

12) RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

Data subject shall have the right to lodge a complaint with a supervisory authority, if the data subject considers that the processing of personal data relating to him or her infringes the GDPR. The complaint can be lodged in the Member State of her/his habitual residence, place of work or place of the alleged infringement.

13) COOKIES AND A LEGAL BASIS FOR USING COOKIES

Our website uses cookies which are used in order to make it more user-friendly and anonymously track your use of the website or target marketing. Cookies are small text files that a website stores on your device when you browse that website.

You can stop us from using cookies at any time. You can find more details about cookies and how to manage cookies e.g. from here: <https://www.aboutcookies.org>.

14) SECURITY OF PROCESSING

We carry out the appropriate technical and organizational measures to protect personal data against loss, destruction, misuse and unauthorised access or disclosure.

15) DATA PROTECTION PRINCIPLES

Nordic Sales Crew Oy uses all reasonable efforts to maintain physical, electronic, and administrative safeguards to protect personal information from unauthorized or inappropriate access, but Nordic Sales Crew Oy note that the Internet is not always a secure medium. Nordic Sales Crew Oy restricts access to information about data subjects only to the personnel of Nordic Sales Crew Oy that need to know the information e.g. for responding to inquiries or requests made by the data subjects.