

# NORDIC SALES CREW OY'S PRIVACY NOTICE

(updated on 18.4.2019)

Before we process your (see Section 3 below) personal data, with this this Privacy Notice we provide you with the information according to Articles 13 and 14 of the GDPR. We provide our personnel with similar notifications separately.

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 Section 13 below. Otherwise we comply with the provisions of each relevant data processing agreement.

## 1) CONTROLLER

Nordic Sales Crew Oy  
2758082-6  
Unioninkatu 7, 00130, Helsinki

## 2) CONTACT PERSON

Mathias Dahlqvist  
+358 (0) 44 0500 531, mathias.dahlqvist@nordicsalescrew.com

3) DATA SUBJECTS AND PERSONAL DATA	4) PURPOSE FOR PROCESSING	5) LEGAL BASIS FOR PROCESSING
<b>Customers and potential customers:</b> <ul style="list-style-type: none"><li>• contact details</li><li>• data relating to client relationships</li></ul>	Customer relationships	<b>Contract</b> ⇒ to perform the contracts to which we are a party to
	Direct marketing <ul style="list-style-type: none"><li>• emails</li><li>• phone calls</li></ul>	<b>Our legitimate interest</b> ⇒ to manage and develop our customer relationships and further develop our business operations  ⇒ NB! You have a right to opt-out of direct marketing each time we provide marketing to you
<b>Business partners and potential business partners:</b> <ul style="list-style-type: none"><li>• contact details</li><li>• business partner relationship data</li></ul>	Business partner relationships	<b>Contract</b> ⇒ to perform the contracts to which we are a party to

<b>Jobseekers:</b> <ul style="list-style-type: none"> <li>• contact details</li> <li>• CV</li> <li>• possible registration data</li> <li>• possible other data the data subject chooses to disclose to us</li> </ul>	Recruiting	<b>Our legitimate interest</b> ⇒ to manage our jobseekers and possibly employ them  NB! You have a right forbid us from processing your personal data.
<b>Persons who contact us, including social media contacts (e.g. persons who like our Facebook-page)</b> <ul style="list-style-type: none"> <li>• contact details</li> <li>• possible other data the data subject chooses to disclose to us</li> </ul>	Management of contacts	<b>Our legitimate interest</b> ⇒ to manage contacts made to us  NB! You have a right forbid us from processing your personal data.
<b>People visiting our website</b> <ul style="list-style-type: none"> <li>• IP addresses</li> </ul>	Cookies	<b>Consent</b> ⇒ Consent based on Act on Electronic Communications Services (917/2014)

## 6) REGULAR SOURCES OF INFORMATION

Data regarding the data subject are regularly gathered:

Data subject:	Sources of information:
Customers and potential customers	<ul style="list-style-type: none"> <li>- Customers and potential customers</li> <li>- Business partners</li> <li>- Public sources, as in internet, postal services, Trade Register, etc.</li> </ul>
Business partners and potential business partners	<ul style="list-style-type: none"> <li>- Business partners</li> <li>- Public sources, as in internet, postal services, Trade Register, etc.</li> </ul>
Jobseekers	<ul style="list-style-type: none"> <li>- Jobseekers</li> </ul>
Persons contacting us	<ul style="list-style-type: none"> <li>- Persons contacting us</li> </ul>
Social media contacts	<ul style="list-style-type: none"> <li>- Social media</li> </ul>
Persons visiting our website	<ul style="list-style-type: none"> <li>- Cookies</li> </ul>

## 7) PERIOD FOR WHICH THE PERSONAL DATA WILL BE STORED

Data subjects	Retention period
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7.1) Customers	Necessary data shall be retained for three (3) years following the end of customer relationship.
7.2) Business partners and potential business partners	Necessary data shall be retained for as long as it necessary, taking into consideration our field of business.
7.3) Jobseekers	Necessary data shall be retained for a period of twelve (12) months following the first contact made, if the jobseeker has not become our employee.
7.4) Persons who contact us (not including social media)	Necessary data shall be retained for a period of three (3) years following the contact.
7.5) Social media contacts	Necessary data shall be retained for as long as the data subject deletes his/her data.
7.6) Persons receiving our direct marketing	Necessary data shall be retained for as long as the client relationship or potential client relationship is relevant.
7.7) Cookie data	Depends on each cookie.

7.8) However, we may retain only the necessary data of the 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.

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

## 8) CATEGORIES OF RECIPIENTS OF PERSONAL DATA

The recipients of personal data may consist of:

- our business partners
- data storage and communication service providers
- accounting and auditing service providers

## 9) INFORMATION TRANSFER OUTSIDE OF EU OR THE EUROPEAN ECONOMIC AREA

We can transfer data outside the EU /EEA. When doing so, we ensure adequate safeguards for the data. Such safeguards include e.g. model clauses, Privacy Shield and other such arrangements.

## 10) 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 contact details 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	Description
10.1) Right to inspect	The data subject has the right to inspect what, if any, data the controller has stored of her/him.
10.2) Right to rectify and erasure	The data subject has a right to request the controller to rectify or erase the personal data concerning the data subject on the grounds provided by law.

10.3) Right to restriction of processing	The data subject can request the controller to restrict the processing of the personal data concerning the data subject on the grounds provided by law.
10.4) Right to data portability	The data subject shall have the right to receive the personal data concerning her/him, which he/she has provided to the controller, in a structured, commonly used and machine-readable format where the processing is based on consent or a contract.
10.5) 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.  Where personal data are processed on the basis of the legitimate interests of the controller, the data subject shall have the right to object the processing of personal data concerning her/him for such purposes in accordance with the law.
10.6) 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.
10.7) 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.

### **11) 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.

### **12) COOKIES**

Cookies are small text files that a website stores on your device when you browse that website. Cookies store data of your website use.

Our websites use cookies to improve our website. Cookies used to improve websites are a common part of all modern websites. Our websites use e.g. Facebook's and Snapchat's cookies.

You can control and/or remove cookies freely at the individual browser level. Instructions can be found for example in here: [aboutcookies.org](http://aboutcookies.org).

### **13) SECURITY OF PROCESSING**

We use the following security measures for protecting the personal data we are in charge of:

- (i) Personal data access is limited
- (ii) We protect data with anti-malware, antivirus and other such softwares
- (iii) Each category of data has been assigned with a stakeholder

- (iv) We use up-to-date and reliable systems and services to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services
- (v) We use up-to-date and reliable systems and services to ensure the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident
- (vi) We regularly assess and evaluate our personal data processing activities

#### **14) MODIFICATIONS**

We have a unilateral right to modify this privacy notice. The modifications take effect immediately when we post the up to date version of our privacy notice to our website.