

# Privacy Policy

**PRIVACY POLICY accordance with the Personal Data Act (523 / 1999) 10 §**

## 1. Registrar

Arter Oy  
Physical Address: Valimotie 21, 00380 Helsinki, Finland  
Arter Oy: 09 8683 3630  
Business ID: 2553833-3

## 2. Contact person in matters concerning the register

Greete Kriik, Arter Oy  
[greete.kriik@arter.fi](mailto:greete.kriik@arter.fi)  
+358 504 102 768

## 3. Name of the register

Arter Oy's client register.

## 4. Purpose of processing personal data

The register maintains Arter Oy's client information. The purpose of processing information under this register is to manage and maintain the relations between Arter Oy and the client; to design and develop Arter Oy's business and services; to perform statistical and market research, advertising, marketing and direct marketing.

## 5. Description of the group of registered

Direct Marketing Register contains information that relates to an identified or identifiable natural person.

## 6. Description of the data related to registered persons

The Personal Register contains the following information:

Personal Data:

- First and last name

Contact information:

- Company address, postal code and location
- Telephone number of the contact person

- E-mail address of the contact person

Staff information:

- The number of employees
- Business ID
- Job title

IDs:

- User name and password for the demo versions of the software
- User type

Other information:

- Contract information
- Services used
- Registration for trainings and seminars
- Barred services
- Lead source

## 7. Regular sources of information

The Personal Register contains personal information obtained when the client organization has ordered Arter Oy's software, services, training; or partnering with Arter through a separate written agreement. The Register also contains the user's self-provided information, as well as information obtained from the authorities and companies that provide update services. Information is obtained from the client's contract and from the client directly through communication with Arter by phone, Internet, e-mail (or other similar manner), or through the use of Arter's services. Arter can also obtain the following information from authorities' and companies' update services: name, address, mobile phone and staff information.

## 8. Regular disclosure of information

Information may be disclosed to Arter Oy's partners and subcontractors acting on behalf of Arter Oy, as permitted by the Personal Data Act. For the needs of third parties, it is possible to create separate customer registers for which the customer is associated with their own consent. These customer registers have their own Privacy Policy.

## 9. Transfer of data outside the EU or EEA

Client information will not be transferred or disclosed outside the EU or EEA territory.

## 10. Principles of registry protection

### A. Data processed electronically

The registrar's information system and files are protected by standard technical protection methods. Registry access and maintenance requires a personal user id and password, which is granted only for the employees of the registry or service providers acting on behalf of Arter Oy, whose position requires access rights and duties include processing of personal data. Each person handling information in the client register has signed a non-disclosure agreement.

### B. Manual data

Documents containing client's personal data is maintained in Arter's office space. Only Arter staff have access to this space.

## 11. The inspection right

The person in register can check the information stored in the register by contacting Arter Oy's contact person, whose contact information can be found in section 2 of this document.

## 12. Right to demand correction

Everyone has the right to demand correction of their personal data that is incorrect. A demand to correct information can be made by contacting Arter Oy's contact person, whose contact information can be found in section 2 of this document.

## 13. Other rights relating to the processing of personal data

According to the EU's General Data Protection Regulation 2016/679, everyone has the right to request the removal of their data from the Personal Register. The information will be deleted when the client relationship and the related mutual obligations have ended. The registered person has the right to obtain a copy of their information. The register is not used for automatic decision making or for profiling. Potential information security breaches for registered data will be communicated to registered persons and public authorities in accordance with the regulations.

For all data protection and personal data processing issues, contact Arter Oy's contact person, whose contact information can be found in section 2 of this document.

This Privacy Statement is made available for registered on Arter Oy's website.