

# Direct Marketing Register

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

Mikko Hiltunen Arter Oy  
[mikko.hiltunen@arter.fi](mailto:mikko.hiltunen@arter.fi)  
+358 50 435 6935

## 3. Name of the register and registration criterion

Arter Oy's Direct Marketing Register, the registration is based on the management of personal data for the purposes of direct marketing in different channels.

## 4. Purpose of processing personal data

The purpose of processing personal data may also be communicated by means of campaign-specific privacy policies. This includes campaigns that are predetermined and short-term. Information on the content of these campaigns will be informed in a separate privacy policy for that campaign.

## 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: first and last name, e-mail, telephone number, location, industry and the ordered Arter Oy's services.

## 7. Regular sources of information

The Personal Register contains personal information obtained when the person has left the contact information in the Arter website, by requesting a software demo, sign up for free seminars or open training, downloaded materials, or subscribed to the newsletter. Register also contains other personal data obtained by collecting information from Suomen Asiakastieto Oy and other similar public and private registers.

## 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.