CLIC INNOVATION Oy

17 March 2020

Privacy Policy, network

Controller

CLIC INNOVATION Oy

Business ID: 2689612-4

Address: Eteläranta 10, FI-00130 Helsinki

Domicile: Helsinki, Finland

Person responsible for matters related to the register and contact person

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Name of Personal Data Register

Personal data register related to CLIC INNOVATION Oy's network members

Legal Basis and Purpose of Processing Personal Data

The basis of processing personal data is the legitimate interest of CLIC INNOVATION OY.

The purpose of processing personal data is:

- to communicate on CLIC INNOVATION Oy's operations and events and other related communication,
- to develop CLIC INNOVATION Oy's services and operations, maintain and activate stakeholder relations and related communications,
- to send newsletters,
- · to organise events, and
- to carry out customer satisfaction surveys and other enquiries and surveys.

Registered Data

The following data is stored in the personal data register:

- **basic data of the data subject**, such as name, position in the organisation, connection to CLIC INNOVATION Oy;
- **contact data of the data subject**, such as email address and telephone number;
- data from the employer company's trade register extract; and
- event participant information and possible information related to events, such as dietary information and accessibility needs.

Regular Sources of Data

Data in the register is regularly collected from the data subject by phone, online, in meetings and other similar methods. Personal data can be collected and updated from publicly available data sources, such as company websites, the trade register and other public and private registers.

Disclosure of Data

We process the data ourselves and utilise subcontractors working for us in the processing of personal data. We store personal data on servers administered and secured by the subcontractors. We do not regularly disclose register data to third-party sources.

The contact details and other participant details of the participants can be disclosed to an event organiser acting as a collaboration partner for communication related to an event and other similar purposes. Otherwise, data is not regularly disclosed to third parties.

Personal data is not disclosed outside the EU or EEA.

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Protection of the Register and Storage Time

Data in electronic format shall be kept in CLIC INNOVATION Oy's or its subcontractors' data systems, where both technical and programmatic methods are used to ensure data protection requirements and data protection.

Only those of our employees with the right to process customer data based on their job are entitled to use the service that contains the personal data. Each user has a personal user ID and password to the system. Data is collected in databases that are protected with firewalls, passwords and other technical methods. The databases and their backup copies are stored in such a way that only specific appointed persons can access them.

We store personal data for as long as necessary for the purpose of use of the personal data. Principally, the data is stored for 3 years. Sensitive data is disposed of as soon as the purpose of use has ended, for example, dietary information is disposed of immediately after an event.

We evaluate the necessity of storing data regularly and consider the applicable legislation. In addition, we apply such reasonable steps that ensure that no such data that is incompatible, expired or inaccurate for its purpose of use is stored of the data subjects in the register. We shall rectify or erase this kind of data immediately.

Rights of the Data Subject

As a data subject, you have the right to verify the data that is stored of you in the personal data register and to demand the rectification or erasure of inaccurate data if the request has legal grounds. You also have the right to withdraw your consent. Please deliver requests related to this matter personally or in writing to the abovementioned contact person.

As a data subject, you have the right to object or to ask for restriction of the processing of your data as well as to complain about the processing of your personal data with the supervisory authorities.

For specific personal reasons, you also have the right to object to profiling directed at you and other processing procedures when our legitimate interest is the basis of the processing of data. In the context of your demand, you must specify the specific situation on which you base your objection of processing. We can refuse to implement the request of objection only if the refusal is based on reasons provided by law.

As a data subject, you also have the right to object to processing, including profiling to the extent that it is related to direct marketing, at any time and free of charge.

Changes in the Privacy Policy

If we make changes in this privacy policy, we shall mark the dated changes in the policy. If the changes are significant, we may inform of them even in other ways, such as by email or by making a notification on our website. We recommend that you regularly visit our website and note any possible changes in the policy.