

## Lappset Group Oy's Privacy Statement regarding its customer and marketing register

### Controller

Lappset Group Oy  
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[lappset@lappset.com](mailto:lappset@lappset.com)  
(hereinafter "We" or "Lappset").

### Contact person in register-related matters

Maarit Pyykko  
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### Name of the register

Lappset Group Oy's customer and marketing register

### What is the legal basis for the processing of personal data and its purpose?

The processing of personal data is based on Lappset's legitimate interest related to customer relationships or other relevant context and the fulfilment of contract.

Personal data is processed for the following purposes:

- deliver and develop our products and services;
- fulfil contracts and other service pledges and obligations;
- manage customer relationships;
- organise events;
- analyse and profile the behaviour of customers and other data subjects;
- engage in electronic direct marketing;
- target marketing efforts in Lappset's own online services and those of others.

We use cookies and profiling to identify data subjects' personal profiles, online behaviour, age and consumer patterns. We use this information to target marketing efforts and develop the services. Read more about our cookie policy [here](#).

## What information do we process?

We process the following personal data of customers or other data subjects in connection with the customer register:

- ***data subject's basic information***, such as name, customer number or other number series such as a lead ID no., username and/or other identifier, password;
- ***data subject's contact details***, such as an e-mail address, telephone number, street address;
- ***information on companies and their contact persons***, such as business identity code, names and contact details of contact persons, position/title, academic title, customer segment, website, country, IP address, positioning data indicating company location;
- ***potential objections and consent to direct marketing***;
- ***information on event participants and any event-related information, such as dietary restrictions***;
- ***information on customer relationships and contracts***, such as information on past and existing contracts and orders, other transaction data, such as usage history of Lappset's website, browser information, IP address, customer portal log data;
- ***other potential information collected with the data subject's consent***, such as positioning data, work-related interests and personal hobbies.

The personal data items marked with an asterisk are necessary for the creation of a contract and/or customer relationship. In the absence of the necessary personal data, We are unable to deliver products and/or services.

## Where do We gather the information from?

The primary sources of information are the data subjects themselves, the population register, the authorities, credit card companies, contact detail providers and other equivalent reliable parties. Additionally, personal data may also be collected and updated for the purposes indicated in this privacy statement from other public sources and government agencies or other third parties in compliance with the applicable legislation. The data is updated manually or automatically.

## Who do we disclose the data to and do we transfer the data to outside the EU or EEA?

We do not disclose the data to third parties.

We engage several subcontractors in processing personal data. We have outsourced IT management to an external service provider. The personal data is stored on the server managed and protected by said service provider.

We transfer personal data to outside the EU/EEA to our network of subsidiaries and/or distributors in the United States, China, Hong Kong, Canada, Australia, Iraq, Iran, Israel, Kuwait, Arab Emirates, Qatar, Singapore, South Korea, Taiwan, Syria, Thailand, Turkey and Ukraine. We have taken appropriate measures to safeguard the data transfers. We apply EU-approved standard contractual clauses.

## How do We protect the data and how long will we retain it?

Access to the system containing personal data is limited to the employees entitled to process such data in the course of their work duties. Each user has a unique username and password to access the system. The data is saved in databases protected by firewalls, passwords and other technical means. The databases and back-up copies are located in locked premises and can only be accessed by pre-designated individuals.

We retain personal data for as long as necessary for the intended purpose or as required by law. The personal data collected by the SharpSpring™ automated marketing system is retained for 18 weeks, after which the data is automatically erased unless the data subject is active on our website.

The personal data needed for individual events gathered by the Lyyti Event Management System is retained for 12 months after the event unless a data subject requests the erasure of his or her data. The data in the Lyyti Event Management System is anonymised when 12 months have elapsed from the event, after which such personal data can no longer be retrieved.

We assess the need for the retention of the data regularly with due regard to legal requirements. Additionally, we take other reasonable measures to ensure that the register does not contain any information on data subjects that is inconsistent with the purposes of processing, or outdated or incorrect. We correct or destroy all such data promptly.

## What are your rights as a data subject?

As a data subject, you have the right to access your personal data in the personal file and demand that any incorrect data is corrected or erased if legal grounds for this exist. You also have the right to cancel or modify your consent.

Under the General Data Protection Regulation (effective 25 May 2018), you have the right to object to or limit the processing of your personal data or file a complaint regarding the processing of your data with the supervisory authority. To the extent that you have yourself submitted information to the customer register that is processed subject to your consent or order, you have the right, as the data subject, to receive this data primarily in machine-readable format and to transfer such data to another controller.

For special personal reasons, you may also object to profiling and other processing measures when processing of your data is based on a customer relationship between you and Lappset. When filing such a request, you need to identify the specific situation you invoke as a basis for your objection. We may only refuse to comply with such an objection on the grounds set out in law.

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

## Who can you contact?

All the communications and requests related to this Privacy Statement should be addressed in writing or in person to the designated contacts person identified in section (2) above to [privacy@lappset.com](mailto:privacy@lappset.com)

## Changes to this Privacy Statement

If We make any changes to this Privacy Statement, We will indicate them in an updated statement. If the changes are significant, we will also communicate the changes in other ways, such as by e-mail or by posting a notice on our website. It is advisable to check our website regularly for any changes.