



Customer Register B2B / B2C

Privacy Statement

Last updated 17/10//2024

Registrar

SeaFocus / UK Art Oy Ltd

Company code: 2146538-4

Address: Stenbäckinkatu 6, 00250 HELSINKI

Contact Person in Matters Concerning the Register

Heli Koukkula-Teixeira, heli.koukkula@seafocus.international

Legal Basis for Processing

Legitimate interest

Purpose of Personal / Company Data Processing

The purpose of the register is to maintain the organization's B2B and B2C customer register, manage, archive and process customer orders and manage customer relations. The information can be used to develop operations, for statistical purposes and to produce more personalized targeted content in our services. Personal and company data is processed within the limits allowed and required by the data protection regulation.

The information in the register can be used in the organization's own registers, for example to target advertising, without disclosing personal / company information to external parties. The organization may use partners to maintain the customer and service relationship, in which case parts of the register data may be transferred to the partner's servers due to technical requirements. The data is only processed to maintain the customer relationship of the data controller organization through technical interfaces.

The organization has the right to publish the information contained in the customer register as an electronic or written list, unless the customer specifically forbids it. In this case, the list refers to e.g. mailing labels for direct mail or similar. The customer has the right to prohibit the publication of information by informing the data controller's customer service, by email or to the contact person of the data registry.

Basis of Legitimate Interest

The legitimate interest of the controller in the processing of collected and used personal and company data is based on the freedom to conduct a business. The controller must process personal data in order to perform business-related tasks. The processing of personal and company data in this context cannot necessarily be justified by a legal obligation or on the basis of a contract with the individual. In the balance test, the controller has determined that legitimate interest is the most suitable processing basis for the nature, scope and fulfillment of registered rights and freedoms. The controller has assessed that the activity in accordance with the legitimate interest



does not cause serious harm to the rights and freedoms of the individuals (data subjects) in question.

The Personal / Company Data Groups in Question

Personal / Company data of registered persons / companies representing business customers, their user data.

Recipients and Recipient Groups

The personnel of the registrar and outsourced partners (for example Financial administration) as applicable.

Data Content of the Register

The personal / company register contains the following information:

Contact person's first and last name

- E-mail address
- Telephone number
- Job title
- Information about previous orders

The company / organization they represent

- Postal address

Regular Sources of Information

Information is obtained from registrations made by the customer and notifications made by the customer during the customer relationship. Name and contact information updates can also be obtained from authorities and companies offering update services. Information can also be obtained from subcontractors related to using or producing the service. Information about the customers' other actions in the digital environment can be obtained from partners' sites, information systems or other digital sources, which are logged in via an electronic invitation, via cookies or using the credentials given to the customers.

The information in the customer register is only used by the organization, except when using an external service provider either to produce a value-added service or to support a credit decision. Information is not disclosed outside the organization or for the use of its partners, except in matters related to credit application, collection or invoicing and when required by law. The registrant's personal data will be destroyed at the user's request, unless legislation, open invoices or collection actions prevent the data from being deleted.

Personal / Company Data Retention Period

10 years from the end of the customer relationship.

Regular Transfers of Information

The information in the customer register is only used by the organization, except when using an external service provider either to produce a value-added service or to support a credit decision. Information is not disclosed outside the controller or for the use of its partners, except in matters related to credit application, collection or invoicing and when required by legislation. The



registrant's personal data will be destroyed at the user's request, unless legislation, open invoices or collection actions prevent the data from being deleted.

Data Transfer Outside the EU or EEA

According to the rules, the data in the register is not transferred outside the EU or the EEA. However, it is possible that the processing uses service providers outside the EU/EEA area or that the service providers' clouds are located outside the EU/EEA area, in which case the SCC standard clauses are used as the basis for data transfer, and additional protection measures have been implemented in data transfers, such as internal guidelines (on pseudonymization of personal data and similar) and possibly a TIA analysis if the situation requires one. When an organization that processes personal data is committed to the EU-US Data Protection Framework (DPF), it is used as the basis for transfer during its validity.

Principles of Registry Protection A: Manual Material

Contact information collected in customer transactions and other manually processed documents containing customer data are stored in locked and fire-proof storage facilities after initial processing. Only designated employees who have signed a non-disclosure agreement have the right to process manually stored customer data. In the protection and processing of data in the register, the provisions and principles of the Data Protection Act, regulations of the authorities and good data processing practices are followed.

Principles of Register Protection B: Electronic Material

Only designated employees of the organization and the companies acting on its behalf have the right to use the customer owner and customer register and maintain its information. Each defined user has his own personal username and password. Each user has signed a non-disclosure agreement. The system is protected by a firewall that protects external connections to the system. In the protection and processing of data in the register, the provisions and principles of the Data Protection Act, regulations of the authorities and good data processing practices are followed.

Cookies

We use cookies on our website. A cookie is a small text file sent to the user's computer and stored there. Cookies do not damage users' computers or files. The primary purpose of using cookies is to improve and customize the visitor's user experience on the site and to analyze and improve the site's functionality and content. The information collected with the help of cookies can also be used in the targeting of communication and marketing and in the optimization of marketing measures. The visitor cannot be identified using cookies alone. However, information obtained with the help of cookies can be linked to information obtained by the user in other contexts, for example when the user fills out a form on our site. The following types of information are collected with the help of cookies: - the visitor's IP address - the time of the visit - pages browsed and page viewing times - the visitor's browser Your rights The user visiting our website has the option to prevent the use of cookies at any time by changing their settings in the cookie banner. Some browser programs also allow you to disable the cookie function and delete already saved cookies. Blocking the use of cookies may affect the site's functionality.

Automatic Processing and Profiling



No profiling or automatic processing is applied to the processed personal / company data.

Inspection right, i.e. the right to get access to personal data.

The registered person has the right to check what information about him is in the register. The inspection request must be made in writing by contacting the data controller's customer service or the registry's contact person in Finnish or English. The inspection request must be sent from a demonstrably identifiable e-mail address. The registered person has the right to prohibit the processing and disclosure of his data for direct advertising, distance sales and direct marketing as well as market and opinion research by contacting the data controller's customer service point.

The Right to Transfer Data from One System to Another

The registered person has the right to transfer his/her data from one system to another. The transfer request can be addressed to the registry's contact person.

The Right to Demand Correction of Information

Personal / Company information in the register that is incorrect, unnecessary, incomplete or outdated in terms of the purpose of the processing must be corrected, deleted or supplemented.

The correction request must be made with a handwritten, signed request to the organization's customer service or to the administrator of the personal register, or from a demonstrably identifiable e-mail address. The request must specify which information is required to be corrected and on what basis. The repair will be carried out without delay.

The person from whom the incorrect information was received or to whom the information was given will be notified of the correction of the error. When a correction request is denied, the person responsible for the registry issues a written certificate stating the reasons why the correction request was denied. The person concerned can refer the refusal to the data protection commissioner.

Right of Limitation

The registered person / Company has the right to request the restriction of data processing, e.g. if the personal data in the register is incorrect. Contacts for the person responsible for the register.

Right to Object

The registered person / Company has the right to request personal / company data concerning him and the registered person has the right to request correction or deletion of personal data.

Requests can be addressed to the registry's contact person. If you act as a contact person for a company or organization, your data cannot be deleted during this time.

The Right to File a Complaint with the Supervisory Authority

If you consider that the processing of personal / company data concerning you / your company has violated the data protection regulation, you have the right to file a complaint with the supervisory authority.



You can also file a complaint in the Member State where you have a permanent residence or place of employment. The contact information of the National Supervisory Authority is: Office of the Data Protection Commissioner, Visiting address: Lintulahdenkuja 4, 00530 Helsinki Postal address: PO Box 800, 00531 Helsinki. Telephone exchange: 029 566 6700. E-mail address: tietosuoja@om.fi, webpages: www.tietosuoja.fi

Other Rights Related to the Processing of Personal / Company Data

The registered person has the right to prohibit the transfer and processing of their data for direct advertising and other marketing purposes, to demand the anonymization of the data where applicable, and the right to be completely forgotten.