

Privacy notice for data subjects that are decision makers in a company, own company, are in charge of a company or are beneficial owners

1. Controller: Suomen Asiakastieto Oy, Hermannin rantatie 6, PL 16, 00580 Helsinki, www.asiakastieto.fi
www.omatieto.fi, www.proff.fi

Suomen Asiakastieto Oy is part of Enento Group Plc, Hermannin rantatie 6, PL 16, 00580 Helsinki
www.enento.com

2. Personal data which is processed

Decision makers

- Your name and email address connected to your role
- Information on your role and title
- Information on the prohibition to use your personal data for marketing purposes

Owners

- Your name
- Your ID number or your birthday
- Your nationality
- Information on your ownership of the company

People in charge of a company

- Your name
- Your domicile
- Your ID number
- Your nationality
- Information on your role in the company
- Start and end date of this role
- Information on companies you are or have been in charge of
- Information on your possible business ID (sole traders)
- If you have a personal payment default entry recorded, this will be processed as personal credit information. For more information please see the "Privacy notice for data subjects that have payment default entry"

Beneficial owners

- Your name
- Your ID number
- Your nationality
- Start date of this role or when information was recorded in Trade register
- Information on your ownership of the company

We also process call recordings of the recorded phone calls we have with you.

3. Purposes for processing your personal data

Decision makers

Asiakastieto processes your personal data to provide it to the companies processing them for marketing purposes, for polls and for updating customer databases.

Owners

Asiakastieto processes your personal data to provide information about the owners of the company to business customers. Customers need this information to be able to comply with the requirements of the Act on Preventing Money Laundering and Terrorist Financing.

People in charge of a company

- Asiakastieto processes data for business purposes and provides services concerning lending and other financial decision making, this includes processing personal data.
- Personal data concerning you will be processed and provided to customers along with the information concerning the company.

- Personal credit information will also be processed to assess your financial position and ability to manage your financial commitments, please see "Privacy notice for data subjects that have a payment default entry".
- Personal data concerning data subjects in charge of a company will be processed according to Credit Information Act when rating companies.

Beneficial owners

Asiakastieto processes data for business purposes and provides services concerning lending and other financial decision making, this includes processing personal data.

4. Legal basis for processing your personal data

Decision makers

We process your personal data based on GDPR 6.1 f and the legitimate interest of Asiakastieto and our customers.

Owners

We process your personal data based on GDPR 6.1 e.

People in charge of a company

- We process your personal data based on GDPR 6.1 e
- We process personal data as provided in section 12 of Credit Information Act and this provides legal basis for the processing of personal data in situations meant in GDPR 6.1 e.

Beneficial owners

- We process your personal data based on GDPR 6.1 e.
- We process personal data as provided in section 21 of Credit Information Act and this provides legal basis for the processing of personal data in situations meant in GDPR 6.1 e.

5. Special categories of personal data and personal data relating to criminal convictions and offences

We don't process sensitive category personal data or data relating to criminal convictions and offences concerning you.

6. Collection of your personal data

We collect personal data concerning you from third parties which are

Decision makers

- Data subjects: Information about the role, contact information
- Employer of the data subjects: Information about the role, contact information
- Press and other public sources: Information about appointments
- Publicly available sources: e.g. databases, internet

Owners

- Owner registers of the company: Information about ownership
- Trade register: Information about ownership when company is established

People in charge of a company

- Companies and trade register: Information about shareholders, board members, CEO, owners

Beneficial owners

- Trade register: Information about beneficial owners

We collect your personal data from you when you contact us or register to use a service. You can give your contact details to us by filling in a form on our website, buying a service or contacting us by calling or by using chat on the website.

When you visit our website we will collect e.g.

- data concerning your purchases
- data about how you use our website
- technical data concerning your browser and your IP address

7. Third parties that we disclose your personal data to inside EU/EEA

Decision makers

We disclose your personal data to other companies.

Owners

We disclose your personal data to other companies.

People in charge of a company

- We disclose your personal data to our customers along with the information concerning the company based on the contract we have with our customer.
- Information about data subjects in charge of a company can be disclosed to parties that want this data. Requesting this data does not require a specific reason.
- Data can be disclosed without being customer of Asiakastieto so, that the identity of the user is not verified.

Beneficial owners

We disclose your personal data to companies, that are required by the Act on Preventing Money Laundering and Terrorist Financing to be aware of the beneficial owners of the parties they do business with.

Your personal data may also be disclosed to our processors based on the contracts we have with them.

8. Transfers of personal data outside EU/EEA area

Your personal data may in some situations be disclosed outside EU/EEA area for example to the processors we use. In these situations we ensure that your personal data is secured to an adequate level. We also use Standard Contractual Clauses and other measures to protect your personal data.

9. Profiling and automatic decision making (incl. meaningful info about the logic involved)

Asiakastieto does not process your personal data for profiling or automatic decision making purposes.

10. Retention periods

Decision makers

Your personal data will be kept for 12 months after it's been registered or updated.

Owners

Your personal data will be kept for as long as you are owner of the company.

People in charge of a company

- Your personal data is deleted within one year of the information being deleted from the authority public register.
- If the company has a payment default entry recorded at above mentioned time, your personal data will be kept until the payment default entry is deleted.

Beneficial owners

Your personal data will be kept for as long as you are registered as beneficial owner of the company in Trade register.

11. Your rights

You as the data subject whose personal data Asiakastieto is processing, have several different data subject rights towards us as the controller. Below you will find information on how to exercise these rights. We will process your request and respond to your request without undue delay and in any event within one month of receipt of the request.

- **Right to information**

If phone call with you is recorded, you will be separately informed about this at the beginning of the call.

Decision makers

You will be informed about processing your data by email or phone and you will receive the privacy notice.

Owners

You will not be informed about the processing of your personal data since it is impossible due to us not processing your contact details.

People in charge of a company

You will not be informed about the processing of your personal data since it is impossible due to us not processing your contact details.

Beneficial owners

You will not be informed about the processing of your personal data since it is impossible due to us not processing your contact details.

- **Right of access**

If you want to know what personal data we process about you, please send an email to omatieto@asiakastiето.fi. We also provide secure email which you can access here <https://mail.asiakastiето.fi/>. If you want to limit your request to certain type of data please communicate that in the email.

- **Right to rectification**

- If you want to request rectification of incorrect personal data concerning you, please send an email to omatieto@asiakastiето.fi. We also provide secure email which you can access here <https://mail.asiakastiето.fi/>.
- **People in charge of a company and beneficial owners:** If some of your personal data is incorrect and it is not due to Asiakastiето mistake, we advise you to contact Trade register to get the data rectified.

- **Right to erasure**

- If you want to request erasure of personal data concerning you please send an email to omatieto@asiakastiето.fi. We also provide a secure email which you can access here <https://mail.asiakastiето.fi/>.
- **People in charge of a company and beneficial owners:** You don't have right to erasure since your personal data is processed based on public interest.

- **Right to restriction of processing**

If you want to request restriction of processing of your personal data please send an email to omatieto@asiakastiето.fi. We also provide a secure email which you can access here <https://mail.asiakastiето.fi/>.

- **Right to data portability**

You don't have the right to data portability, since Asiakastiето is not processing your personal data based on consent or for performance of contract between you and Asiakastiето.

- **Right to object**

- You have the right to object, on grounds to your particular situation, the processing of your personal data which is based on public interest (art 6.1 e) or legitimate interest (art 6.1 f).
- If you want to exercise your right to object to processing please send an email to omatieto@asiakastiето.fi. We also provide a secure email which you can access here <https://mail.asiakastiето.fi/>.
- If you want to object to processing your data for marketing purposes, please send an email to above mentioned email address and we will stop processing your personal data for this purpose immediately.

12. Updating this privacy notice

This privacy notice can be updated time to time and new version will be published on this site.

13. Contact info and possible complaints

If you have questions about how we process your personal data, please contact our customer service at omatieto@asiakastieto.fi. We also provide a secure email which you can access here <https://mail.asiakastieto.fi/>.

Asiakastieto has appointed a Data Protection Officer. You can contact the DPO by sending email to [dpo\(a\)enento.com](mailto:dpo(a)enento.com).

If you are not satisfied with how we process your personal data, you have the right to file a complaint with supervisory authority, The Data Protection Ombudsman (Lintulahdenkuja 4, 00530 Helsinki, [tietosuoja\(a\)om.fi](mailto:tietosuoja(a)om.fi))

Privacy notice has been updated 7/2024