

# Privacy Policy

According to the General Data Protection Regulation, the controller is required to inform data subjects of the usage of their data.

## 1. Controller

Oy Primapoli Ltd

Kitulanmäentie 42  
63640 Ritola, FINLAND

### Contact persons in regard to the register

Harri Vainionpää

Kitulanmäentie 42  
63640 Ritola  
0201 758 438  
harri.vainionpaa@polarlifehaus.com

### Data protection officer

Tuuli-Joanna Rusila

Kitulanmäentie 42  
63640 Ritola  
0201 758 401  
tuuli-joanna.rusila@polarlifehaus.com

## 2. Data subjects

Employees, customers and business partners are subject to the register.

## 3. Usage of personal data

- Usage of personal data is based on the customer relationship of the data subject
- Usage of personal data is based on consent (eg. contract of employment, contract of cooperation, data acquired at events or via the website)

### Purpose of register and using personal data

Personal data is used solely for the purposes listed below:

- Managing customer relationship
- Informing about available services
- Contact requests
- Co-operational purposes

## 4. Personal data stored in the register

The register contains the following information:

Contact information:

- name
- address
- email
- telephone number
- company ID / possible personal ID

Customer information:

- name
- address
- email
- telephone number
- company name
- information about the building project submitted by the customer

## 5. Data subject rights

Data subject has the following rights. Any questions regarding the rights may be addressed at [polarlifehaus@polarlifehaus.com](mailto:polarlifehaus@polarlifehaus.com).

### **Right of access**

Data subject has right to access data stored by the controller.

### **Right of correction**

Data subject has right to request correction of incorrect or insufficient data.

### **Right of opposition**

Data subject has right to oppose usage of personal data that is by their experience unlawfully stored.

### **Prohibition of direct marketing**

Data subject has right to prohibit direct marketing.

### **Right of deletion**

Data subject has right to request deletion of personal data, if usage of data is not necessary. We will review the request, after which the data is either deleted, or we declare there is a justified reason for not deleting the data.

It must be noted that the controller may have a lawful right to not delete requested data.

Accounting Law requires that accounting data must be stored for designated period (10 years).

### **Cancellation of consent**

If usage of personal data is based solely on consent and not for example customer relationship, the data subject has right to cancel their consent.

### **Right of appeal to Data Protection Supervisor**

Data subject has right to demand that we restrict usage of disputed data until the dispute has been settled. Rekisteröidyllä on oikeus vaatia, että rajoitamme kiistanalaisten tietojen käsittelyä siksi aikaa, kunnes asia saadaan ratkaistua.

### **Right of appeal**

Data subject has right to appeal to Data Protection Supervisor, should they feel we breach data protection regulations while using personal data.

Contact information of Finnish Data Protection Supervisor:

[www.tietosuoja.fi/fi/index/yhteystiedot.html](http://www.tietosuoja.fi/fi/index/yhteystiedot.html)

## **6. Sources of information**

Customer data is regularly acquired by following means:

- from the data subject themselves when a customer relationship begins
- from the data subject themselves through a form on our website
- from the data subject themselves at fairs and other events

## **7. Regular disclosing of personal data**

Personal data is not regularly disclosed to third parties. The only exception are official Polar Life Haus sales representatives to whom data may be disclosed for the purpose of managing customer relationships.

For accounting and calculation of salaries, data may be disclosed to Priima Yrityslaskenta Oy. They are committed to complying to the GDPR.

We have ensured all our service providers act in accordance to the GDPR. We regularly use the following service providers:

- Piimega
- G Suite
- MailChimp

## **8. Duration of usage**

Personal data is handled as long as customer relationship is in effect. Subscription to our email newsletters may be ended by clicking the unsubscribe button located at the bottom of each newsletter, or by contacting [polarlifehaus@polarlifehaus.com](mailto:polarlifehaus@polarlifehaus.com).

## **9. Handlers of personal data**

The controller and their employees handle personal data. Use of personal data may on occasion be outsourced to a third party, in which case it is guaranteed by contracts that data is handled according to the GDPR and in an appropriate manner.

Polar Life Haus sales representatives may use personal data for the purpose of managing customer relationships.

## **10. Disclosing personal data outside the EU**

Personal data is not regularly disclosed outside the EU, with the exception of customers residing in non-EU countries.

## **11. Automatic profiling**

Personal data submitted by data subject may be used for profiled marketing, such as profiling by geographical location or interests.