

Helpten Oy

Privacy description 20 May 2018

Last updated	20.5.2018
Definition and scope	<p>This is description of Helpten's privacy policy and of data protection and security practices, processes and technologies that are in place for protecting personal data of Helpten's customers.</p> <p>The scope of this privacy description is the SaaS offering of Helpten: Driving Data service, Service Shop service and Tachograph Remote Download service.</p>
Purpose of this Privacy description	<p>The General Data Protection Regulation (GDPR) or European Union defines and regulates the principles that Controllers (Registrars) need to follow when processing personal data of data subjects. Particularly, GDPR protects the fundamental rights and freedoms of natural persons and in particular their right to the protection of personal data.</p> <p>Helpten's customer acts as the Controller (Registrar) for the personal data that customer stores and processes using services provided by Helpten. Helpten acts as Data Processor (or personal data) on behalf of the customer (Controller/Registrar) based on the instructions from the customer. Subcontractors (sub-processors) of Helpten may also participate to processing of personal data.</p> <p>The purpose of this Privacy description is to:</p> <ol style="list-style-type: none">1. help customers (Controllers/Registrars) to fulfill their responsibility to<ul style="list-style-type: none">- prove that privacy policies are followed in all steps of processing of personal data- evaluate what the policies mean in practice and how they are executed in Registrar's own operation2. describe how Helpten follows the privacy policies when acting as Processor and as Controller/Registrar3. describe which relevant technical and organizational measures Helpten executes for fulfilling the privacy policies, considering available technology, costs, nature of processing, extent, context and purpose for the processing, and considering the risk relating to rights and freedoms of natural persons. <p>Helpten's privacy policies are notification of legality and purpose of data processing, description of collected and processed personal data, technical and administrative protection of data, lawful inspection of data and possibility for change requests.</p>

Privacy policies	<ol style="list-style-type: none"> 1. Legality, moderation and transparency of processing <ul style="list-style-type: none"> - Descriptions of data processing are documented in Helpten's register descriptions. 2. Linkage to purpose of processing <ul style="list-style-type: none"> - By default, only necessary information that is required for the specific purpose are processed. - Customer as Controller (Registrar): Implementation and use of service provided by Helpten, and use of supporting services - Helpten as Controller (Registrar): Provisioning and maintenance of SaaS Services for Helpten's customers. 3. Minimal information <ul style="list-style-type: none"> - Personal data is stored and processed only if the purpose of processing otherwise could not be reached. 4. Accuracy of data <ul style="list-style-type: none"> - All reasonable measures are taken, to ensure the accuracy of personal data. Measures are taken to update the data, whenever necessary. Measures are taken to remove or rectify incorrect information without unnecessary delay. 5. Restricting storage of data <ul style="list-style-type: none"> - Personal data is stored only for the period necessary for reaching purposes of the processing. 6. Integrity and confidentiality of data <ul style="list-style-type: none"> - Personal data must be processed to that necessary data safety is reached, including protection from unauthorized and unlawful processing and from accidental loss or corruption, using relevant technical and organizational measures. 7. Controller's (Registrar's) obligation to demonstrate execution <ul style="list-style-type: none"> - Controller/Registrar must be able to demonstrate that privacy policies are executed. 8. Privacy built-in by default <ul style="list-style-type: none"> - The principle of built-in privacy requires that the privacy policies are effective in all phases of processing.
Register descriptions	<p>Helpten Oy, register of potential customers</p> <p>Customer register of Helpten Oy</p> <p>Customer specific register for driving data, vehicle maintenance and Remote Download services provided by Helpten</p>
Processing of personal data on behalf or the Controller (Registrar)	<p>In some of the SaaS services Helpten processes personal data on behalf of the Helpten's customer. In such cases the customer is the Controller (Registrar) of the register that is formed of this customer's data in the SaaS application, and Helpten acts as Data Processor for this register.</p> <p>In cases like this, the terms of processing are agreed on between the customer and Helpten.</p>

<p>Technical protection of registers</p>	<p>Data systems are technically protected from unauthorized access by using passwords, firewalls and other technical solutions. Data transfers between Helpten and users is encrypted using TLS (Transport Layer Security) technology.</p> <p>Databases and their backups are located in locked and guarded datacenters and only authorized personnel can access the data.</p> <p>Helpten participates to both internal and third-party evaluations that include both technical and organizational security, processes and instructions.</p>
<p>Organizational protection of registers</p>	<p>Only authorized employees of Helpten and its sub-processors can access the personal data, based on specific access rights granted to them. User access is monitored as part of user access control. Particularly, access rights of main users and system administrators are regularly checked and are removed when no longer needed. When employees are leaving the company or when they move to different positions, their unnecessary access rights are removed from all systems.</p> <p>The entire personnel of Helpten and its sub-processor have confidentiality obligations regarding all personal data of the customers. Personnel that participates to processing of personal data are regularly trained, and legality principles are essential part of such training. The security and privacy awareness of personnel is regularly maintained in different ways.</p> <p>Helpten participates to both internal and third-party evaluations that include both technical and organizational security, processes and instructions.</p>

<p>Physical protection of registers</p>	<p>Customer's data is stored in data systems that are located in data centers or cloud services in Finland or in the area of the EU. These data centers have certifications of security measures, access control and monitoring.</p>
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<p>Transfer of personal data outside of EU or European Economic Area</p>	<p>The person register that is a part of Helpten's services is located in data centers within EU or European Economic Area.</p> <p>Helpten does not guarantee that some parts of the functionality of the system or some system development or maintenance processes would not be carried out by sub-processors that are located outside of EU or European Economic Area.</p> <p>By written request by Helpten's customer, Helpten has obligation to provide information about all transfers of personal data outside of EU or European Economic Area or about sub-processors that are involved in such transfers.</p> <p>The customer has right to either agree or disagree on use of such transfers or sub-processors.</p>
<p>The rights of data subjects</p>	<p>According to GDPR 12-22 §, data subject has rights to:</p> <ol style="list-style-type: none"> 1. have access to the personal data 2. have the personal data rectified 3. have the personal data erased 4. restrict the processing of the personal data 5. transfer the personal data to other registrar <p>In situations where data subject requests for the execution of such rights in relation to person register whose Registrar is a customer of Helpten, the data subject must address such requests to the Helpten's customer (Controller/Registrar). The Controller (Registrar) shall evaluate and process the request, and when needed, fulfill the request, assisted by Data Processor (Helpten) if so requested by the customer. Customer's (Controller/Registrar) request for assistance from Helpten shall be sent to Helpten using the email address mentioned below.</p> <p>The request shall have detailed description of the personal data item in question. The request shall be sent by the Controller (Registrar) to privacy(at)helpten.fi.</p> <p>The data subject can utilize rights (1-5 above) without a charge only once per year.</p>
<p>Notification of personal data breaches</p>	<p>To Controller (Registrar): Notification shall be made by Helpten to the Controller (Registrar) without undue delay. The notification shall specify the nature of breach and actions taken, as required by legislation.</p> <p>To data subject: Notification shall be made by the Controller (Registrar) to the data subject, in case the breach is likely to result to a high risk to data subject's rights or freedoms.</p> <p>The notification shall specify the nature of breach and actions taken, as required by legislation.</p>

	<p>To the supervisory authority: Notification shall be made by the Controller (Registrar) to the supervisory authority within 72 hours after having become aware of the breach, in case the breach is likely to result to a high risk to data subject's rights or freedoms.</p> <p>The notification shall specify the nature of breach and actions taken, as required by legislation.</p>
Changes to this privacy description	We are constantly working on improving and developing our services, products and websites, so Helpten may change this privacy description from time to time. Information about such changes will be available in privacy web pages of Helpten Oy. Changes may result from changes in legislation.
Latest changes	20.5.2018: Updates to Helpten's Privacy description