

Helpten Oy

Register Description: Services provided by Helpten

20 May 2018

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| 1. Registrar | <p>Customer of Helpten that is using services provided by Helpten</p> <p>Register description created by: Helpten Oy (Business ID 2104986-6) Sinikalliontie 12, FI-02630 Espoo Finland Tel. +358 (0)10 423 7080</p> |
| 2. Contact person responsible for the register | <p>Data Protection Officer of customer of Helpten that is using services provided by Helpten</p> <p>Helpten Oy (provider of the service and Data Processor for Registrar): Data Protection Officer Timo Lampola Sinikalliontie 12, FI-02630 Espoo Finland Tel. +358 (0)50 377 4438 Email: privacy[at]helpten.fi</p> |
| 3. Name of the register | Customer specific register for driving data, vehicle maintenance and Remote Download services provided by Helpten |
| 4. Purpose of processing personal data | <p>Registrar defines the purpose of the register and of processing personal data.</p> <p>Personal data of the data subject is stored and processed for enabling the implementation and use the service that the Registrar has ordered from Helpten, and for enabling related support services.</p> <p>Personal data is collected and processed to provide the services you have requested or to fulfill legal obligations. The information can also be used for improving the quality of products and services provided by Helpten.</p> <p>The legitimate interest of processing personal data is to fulfill service contract and the provision of these services for use by the Registrar and for the employees of the Registrar.</p> <p>The Registrar and the processors may send messages and other communication to data subject about service bulletins or other information that relates to the service or to the use of the service.</p> |

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| 5. Categories of data subjects | The users of the services that are ordered from Helpten, and the users of vehicles and tracking devices that relate to these services |
| 6. Categories of personal data | <p>Identification of data subject, correspondence information, classification data, contact history information, status data, vehicle information, usage data of Helpten services or related support services, life cycle information, contact history information and information about consents, bans or limitations by the data subject.</p> <p>User, vehicle, tracking device, location data and authorization data, relating to services ordered from Helpten.</p> |
| 7. Data content of the register | <p>Basic personal information about data subject:</p> <ul style="list-style-type: none"> - customer id, employer name, branch or location - name - language preference - start date of registration <p>Vehicle data</p> <p>Id of the tracking device that is allocated to data subject, and id of the SIM card used in this device</p> <p>Status and validity period of data subject's employment and position</p> <p>Coding data, like</p> <ul style="list-style-type: none"> - person or vehicle codes in employer's travel invoice, ERP, work time tracking or tachograph systems - person ids in data systems of the partners of Helpten <p>Position data from the tracking devices and aggregated information, including sensor data, like:</p> <ul style="list-style-type: none"> - location and route history information - trip reports and invoices and related invoicing criteria - work time tracking information <p>Information about whether data subject is Registrar's employee or not</p> <p>Data subject's relations to Registrar, or to partners of Registrar or Helpten, like:</p> <ul style="list-style-type: none"> - vehicle dealer, service shop or chain, leasing company, inspector organization, financing company, insurance company or other company or organization that provides services for Registrar or for data subject <p>Contact information like phone number and email address</p> <p>Address information, like delivery address, home address or business addresses</p> <p>Contact history data with customer service or technical support</p> <p>History about marketing or informing activities to data subject</p> <p>Service usage history and log information</p> <p>Information collected using cookies</p> <p>Other data provided by data subject</p> |

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| 8. Sources of personal data | <p>Name and contact information are collected based on employment, customer relationship or data subject's other relation to Registrar or Helpten. We collect personal information during order and contract process and during the initiation, altering or termination of employment, or when data subjects home or business address is changed.</p> <p>Location data is collected from tracking devices that related to the ordered services.</p> <p>Personal information is gathered when data subject registers to the service or visits Helpten's website or internet services.</p> <p>Helpten website and internet services use cookies and visits leave a mark, which is ip-address.</p> |
| 9. Disclosure of data | <p>The Registrar shall define and decide about data disclosure, and discloses data only based on consent from data subject, or on Registrar's legitimate interest or when disclosure is based on the legislation in effect.</p> |
| 10. Transfer of personal data outside of EU or European Economic Area | <p>The Registrar and Helpten may use subcontractors that may have access to data subject's personal data from outside of EU or European Economic Area, for example from the Unites States. We take care of appropriate and lawful safety measures for such data transfers.</p> <p>Such transfers can be made if any of the following conditions apply:</p> <ul style="list-style-type: none"> - the EU Commission has decided that there is an adequate level of protection in the country in question - other appropriate safeguards have been taken, for example the use of the standard contractual clauses (EU model-clauses) approved by the EU Commission - data subject has given consent for the transfer - there is some other lawful and rightful condition, like a Privacy Shield arrangement (for some US companies) that the European Commission has approved. |
| 11. Principles of register security and data storage time | <p>Keeping your personal data safe and secure is at the center of how we do business. We use appropriate technical, organizational and administrative security measures to protect any information we hold from loss, misuse, and unauthorized access, disclosure, alteration and destruction.</p> <p>Data files, email messages and any printed material are protected appropriately.</p> <p>Outdated and unnecessary personal information is destroyed in appropriate manner. We store personal information only as long as is needed to fulfill the purpose of processing personal data that is defined in this register description. There may be some obligations by bookkeeping, financial, fiscal, taxation of any other legislation that may require storing data for a longer</p> |

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| | <p>period.</p> <p>Databases and their backup copies are located in locked and guarded datacenters, and only authorized personnel can access the data.</p> |
| <p>12. Rights of the data subject</p> | <p>Data subject has right to ban usage of direct mail, distance selling or other direct marketing as well as opinion or market research.</p> <p>You as a data subject the following rights in respect of personal data we hold on you:</p> <ul style="list-style-type: none"> - right to receive information about usage of your personal data - right to request access to your personal data we are keeping about you. - right to request correction of incorrect or incomplete data. If the data are incorrect or incomplete, you are entitled to have the data rectified - right to request erasure of your data in case you withdraw your consent to the processing and there is no other legitimate reason for processing - right to receive your personal data in machine readable format and transfer this data to other registrar, provided that you have yourself provided this data to us - right to object to the processing and there is no justified reason for continuing the processing - right to request restriction of processing of your personal data <p>The requests by data subject need to be sent in written format or by email to the Data Protection Officer of the Registrar.</p> <p>We may request you to further elaborate your request and we have right to verify your identity before processing your request. We may deny from processing your request as necessary to comply with legal obligations, resolve disputes, and enforce our agreements.</p> <p>In case you feel that we have not processed your personal data lawfully, you have always right to lodge a complaint with a supervisory authority of the EU member state of your nationality.</p> |
| <p>13. Changes to this Register Description</p> | <p>We are constantly working on improving and developing our services, products and websites, so the Registrar and Helpten Oy may change this register description from time to time. Information about such changes will be available in privacy web pages of the Registrar and Helpten Oy.</p> |