

Helpten Oy

Register Description: Register of potential customers

20 May 2018

1. Registrar	Helpten Oy (Business ID 2104986-6)
	Sinikalliontie 12, FI-02630 Espoo Finland Tel. +358 (0)10 423 7080
2. Contact person responsible for the register	Data Protection Officer Timo Lampola
	Sinikalliontie 12, FI-02630 Espoo Finland Tel. +358 (0)50 377 4438 Email: privacy[at]helpten.fi
3. Name of the register	Helpten Oy, register of potential customers
4. Purpose of processing personal data	<p>The purpose of processing personal data is to establish a permanent customer relationship between Helpten and the data subject or data subject's employer, and to</p> <ul style="list-style-type: none">- identify the data subject- manage contact information- establish contact to a potential customer- arrange meetings with a potential customer- send news and other product and service information to potential customers- carry out marketing activities towards potential customers- make direct marketing and targeted offering of products or services to potential customers <p>The legitimate interest of processing personal data is marketing. The Registrar may send direct marketing messages and other communication based on data subjects consent</p>
5. Categories of data subjects	Potential customers of Helpten
6. Categories of personal data	Identification of data subject, correspondence information, classification data, contact history information, status data, vehicle information, life cycle information, contact history information and information about consents, bans or limitations by the data subject.

<p>7. Data content of the register</p>	<p>Basic personal information about data subject:</p> <ul style="list-style-type: none"> - id of potential customer, employer name, branch or location - date or year of birth - name - language preference - start date of registration <p>Vehicle data</p> <p>Coding data like debt collection information</p> <p>Information about whether data subject is customer's employee or not</p> <p>Data subject's relations to Helpten, or to partners of 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 Helpten, for potential customer 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, like information about possible negotiations, contacts or issued offers</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>
<p>8. Sources of personal data</p>	<p>Name and contact information are collected based on employment, customer relationship or data subject's other relation to Helpten. We collect personal information during order and contract process.</p> <p>Data may be collected during meetings, training events, seminars or other events, and from business cards, email messages, magazines or other publications.</p> <p>We can also receive personal data from data subject's employer or from a third party informing Helpten about data subject's interest towards Helpten.</p> <p>Personal information is gathered when data subject registers to the service or visits Helpten's website or internet services. Helpten website and internet services use cookies and visits leave a mark, which is ip-address.</p> <p>Contact information may also be purchased from external registers or from public sources.</p>
<p>9. Disclosure of data</p>	<p>The Registrar 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> <p>Helpten may disclose personal information to its resellers and sales agents and to partners that are directly involved in delivery or production of the service. Personal data is not disclosed to other third parties for marketing or any other purposes.</p>

<p>10. Transfer of personal data outside of EU or European Economic Area</p>	<p>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 United 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.
<p>11. Principles of register security and data storage time</p>	<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 or any other legislation that may require storing data for a longer 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 have 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

	<p>reason for processing</p> <ul style="list-style-type: none"> - 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: Helpten Oy /Timo Lampola Sinikalliontie 12 FI-02630 Espoo Finland privacy(at)helpten.fi.</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>Helpten Oy responds to data subject's request within one (1) month from the date when request was received at Helpten.</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>
13. Changes to this Register Description	<p>We are constantly working on improving and developing our services, products and websites, so Helpten may change this register description from time to time. Information about such changes will be available in privacy web pages of Helpten Oy.</p>