

# **CUSTOMER REGISTER PRIVACY POLICY**

## Name of the register

Customer Register of MORS Software Oy

#### Controller of the register

MORS Software Oy Aleksanterinkatu 48 A, 5th Floor, 00100 Helsinki, Finland FI20192636

### Contact information for matters related to the register

sales@morssoftware.com, +358 9 6829 650

#### Legal basis for the register

Personal information is processed in the register for the performance of a customer contract, or on other relevant grounds.

## Purpose of the processing of personal data and the direct marketing register

Personal information is processed in the context of rendering services to customers, managing, maintaining and developing customer relations, for analysis and statistics as well as to offer, create and develop services.

Personal information of customer contacts can be used in MORS Software's direct e-mail or in other comparable marketing campaigns.

#### Description of the groups of registered persons

The Customer Register includes a customer's contact persons for managing customer contracts, rendering services, billing, and other similar functions.

#### **Content of the Customer Register**

Information grouped as follows can be processed in the Customer Register:

- Contact person's name, e-mail addresses, telephone numbers and profession/title
- Information related to the customer contract or other relevant premises as well as information concerning the services used
- Information about permissions or refusals of direct marketing
- Information about communications regarding client service situations
- Other information representing management of customer relations



## Regular sources of information

Personal information is collected from the customer when the business relationship with the customer is established, when the services are rendered, or in other communications with customer.

## Regular hand-over of information

Personal information is not handed over to third parties. Handover of information is possible only with the permission of the data subject, or in accordance with effective legislation.

The Customer Register is maintained and operated by carefully selected service providers and affiliates.

Personal information of customer contacts can be used in MORS Software's direct e-mail or in other comparable marketing campaigns.

## Transfer of data out of the European Union or the European Economic Area

Personal information can be transferred out of the European Union or the European Economic Area only in accordance with the legislation set out for data privacy. In order to render services to customers, data processing is performed by using service providers, whose servers may on occasion be physically located outside the European Union or the European Economic Area.

### Principles of data security

Processing of personal information is performed by adhering to the appropriate data management practice and in compliance with obligations regarding due diligence and protection, as set out in the legislation for data privacy.

Processing of personal information is carried out by undertaking the necessary technical and organisational measures to protect personal information from inappropriate access, from accidental or illegal disposal, alteration, handover, transfer or other illegal handling of information.

Personal information can be accessed only by those persons whose duties and work assignments require processing of personal information.

Digitally stored and processed information is held in databases that are protected by firewalls, passwords and other technical means. Data files in paper format are stored in locked spaces.

#### Personal data storage period and principles of storage

Personal information is kept as long as it is necessary for the management of the customer relationship. Obsolete and unnecessary information is deleted within a month after notification of this obsolescence is received from the customer. Personal information included in billing records is kept for the time period required by the legislation for bookkeeping.



## Rights of data subjects

The persons included in the register are entitled to check their information in the register. In order to do this, they must send a written, personally signed request to the company. Such an enquiry can also be made at the company's offices in the address specified above.

The data subject is entitled to demand the correction of an incorrect piece of information in the register.

The data subject has also the right to have the controller delete the personal data concerning the data subject in certain situations and request to transmit this data to another controller.

Electronic direct advertising may be delivered to the data subject. The data subject has the right to prohibit the controller from processing their data for purposes of direct advertising, distance selling and other direct marketing, and for market surveys and polls.

The possible disputes shall be resolved primarily with negotiations with the data subject. The data subject has the right to lodge a complaint with a supervisory authority.