

PRIVACY POLICY

Combined data protection statement and information document pursuant to the Data Protection Act and the General Data Protection Regulation of the European Union (2016/679/EU).

Controller

Carina Solutions Oy
Mustionkatu 2, 20750
Business ID: 2520223-1

Contact person for data protection matters

Name: Toni Saarinen
Telephone: +358 50 5664791
Email: toni.saarinen@c4.fi
Postal address: Mustionkatu 2, 20750 Turku

LEGAL BASIS FOR PROCESSING PERSONAL DATA

General information on the processing of personal data

To the extent that we collect personal data in our operations, the Data Protection Act and other laws, regulations, decrees and official instructions in force at any given time regarding the processing of personal data shall be complied with. Personal data refers to data that can be linked to a specific person. This document describes in more detail the procedures for the collection, processing and disclosure of personal data, and the rights of the customer or employee, i.e. the data subject.

Purpose of collecting personal data

We collect personal data through the following channels for the following purposes:

Fulfilment of obligations relating to employment relationships

We collect the personal data of the controller's employees to fulfil the requirements relating to employment relationships and related statutory obligations. The data collected is directly necessary for the employee's employment relationship and relates to the fulfilment of the rights and obligations of the parties to the employment relationship or to the benefits provided by the employer to the employees, or which arises from the special nature of the work concerned. The legal basis for the processing of personal data is then the employment relationship of the employees and fulfilment of the controller's statutory obligations.

Collection of data from users of Pipedrive and Trello

We collect the telephone numbers and contact details, etc. of users of the above software as well as discussions within the applications in order to fulfil and monitor the contractual obligations of the controller's business operations. The legal basis for processing personal data is therefore fulfilment of the controller's statutory obligations and/or the customer relationship.

CALS material management system

We collect the telephone numbers and contact details, etc. of the controller's customer organisations and their sub- and side contractors in order to fulfil and monitor the controller's statutory obligations. The legal basis for processing personal data is therefore fulfilment of the controller's statutory obligations and/or the customer relationship.

Contact forms of websites cals.fi and c4.fi

To develop our business operations and enable marketing, we collect data using the contact forms of cals.fi and c4.fi. The legal basis for processing personal data is therefore a customer or contractual relationship, or our legitimate interest as a provider of professional services.

Management of customer relationships

We collect personal data provided by our customers or customer representatives in order to provide services and to deliver and offer products. The legal basis for the processing of personal data is therefore a customer relationship, a contractual relationship or our legitimate interest as a provider of professional services.

The personal data collected concerns the identification of our customers and their representatives, communication and related background information. The personal data we use includes, for example, names, email addresses, telephone numbers and addresses, as well as standard information required for billing.

We collect personal data necessary for managing customer relationships mainly directly from data subjects and public registers, such as the Trade Register. In some cases, we collect personal data from a third party, in which case the data subject is usually a partner of our customers. In such a case, we do not separately inform the data subject about the processing of their personal data. The basis of the collection of personal data is the controller's contractual or customer relationship with a customer or client and/or a relationship with a customer or client related to the performance of an assignment or with another person related to the assignment. The abovementioned persons are referred to in this privacy policy as the Customer.

Storage of data based on consent

To the extent that the right to register based on the abovementioned laws or circumstances is exceeded, or there is no other legal basis mentioned, the Customer will be separately asked to consent to the storage, processing and retention of personal data.

Use of data

The information in the customer register can be used for the following main purposes:

- customer relationship management and development
- producing, providing, developing, improving, and protecting services
- billing, collection, and customer transaction verification
- advertisement targeting
- services analysis and statistics
- customer communication, marketing, and advertising
- protection and safeguarding of the rights and/or property of the controller relating to services and of other persons and entities relating to assignments
- performing the statutory obligations of the controller, and
- other similar uses.

Personal data concerning employees can be used for the following main purposes:

- management of employment contracts
- payment of salaries,
- development, improvement, monitoring and protection of the controller's activities,
- performing the statutory obligations of the controller, and
- other similar uses.

Penalties for not receiving information

If the controller does not receive the information required from the customer, a customer relationship cannot be initiated or continued, nor may another agreement or legal action be entered into with the Customer.

INFORMATION CONTENT OF CUSTOMER REGISTER

The customer register processes information in the following categories:

- basic customer information, such as full name, address, language

- the personal identity code and, where applicable, the business identity code, of the person acting on their own behalf or on behalf of the company for reliable identification
- billing and collection information
- information related to the customer relationship and the contractual relationship, such as the services provided to the Customer, their delivery and use and other similar information
- authorisation information and prohibitions, such as direct marketing authorisations and prohibitions
- points of interest and other information provided by the Customer
- other transaction information for the services
- complaints and processing information.

DATA RETENTION PERIOD

Data relating to data subjects will be retained for ten (10) years from the end of a supply or service agreement or an employment relationship.

Other personal data will be erased when there is no longer a need to retain personal data. If the collection and storage of personal data has been based only on the consent of the data subject, the personal data will be deleted at their request.

REGULAR DATA SOURCES

Personal data is collected from the data subject themselves in connection with the customer relationship, other events relating to the agreement and the preparation of documents when otherwise using the services of the data controller or otherwise directly from the data subject. Personal data can also be collected and updated, for example, from the population register and other authority registers as well as from the cadastral register, credit data registers, etc. Data related to employment relationships is collected directly from employees.

Information based on consent is collected directly from the data subject or, with their consent, from registers or sources maintained by the authority or a third party.

DISCLOSURE OF INFORMATION

In principle, personal data is not disclosed to any third parties.

The controller may disclose personal data only within the limits and to the extent permitted by applicable law and for the purpose of implementing the agreement between the parties.

Data is not regularly transferred outside the European Union or the European Economic Area. However, data may be transferred or disclosed outside the European Union or the European Economic Area as permitted by law, provided that the data is transferred to a country where the European Commission has determined that the level of data protection is adequate, or contractual arrangements can guarantee an adequate level of data protection. Transfers outside the EU can also be made using a variety of cloud services.

In connection with the outsourcing of the controller's information management, the processing of personal data may also be performed by the controller's subcontractors, but in that case only on behalf of the controller.

PRINCIPLES OF REGISTER PROTECTION

Only those employees of the controller shall have access to the information for whom it is necessary for the performance of their work-related tasks. The information is collected in the service's databases in servers which are protected by firewalls, passwords, and other technical means.

To the extent that personal data is processed on behalf of the controller by its subcontractor, agreements between the controller and the subcontractor shall ensure that appropriate safeguards and confidentiality is in place and that the processing of personal data complies with data protection law.

RIGHTS OF DATA SUBJECTS

Reviewing, receiving, and transferring data

The Customer and employee have equal rights of a data subject to review the content of information collected about them. The Customer has the right to review what information is stored about them in the Customer Register. The employee has the right to review what information is stored on them on the basis of the employment relationship. The Customer or employee shall submit a request for review to the controller in writing in a hand-signed form or an equivalent certified document, or by email.

The controller shall provide the above information to the data subject within 30 days of the submission of the request for review. The data subject has the right to have customer data concerning them that they have submitted transferred to a third party in a structured and generally used machine-readable form. However, the controller will retain the transferred data under this privacy policy.

Correction of incorrect information

The data subject has the right to correct the personal data stored in the personal register insofar as they are incorrect.

Objecting to or restricting processing of data and erasing data

The data subject has the right to object to the processing of their personal data for direct advertising, distance selling, and other direct marketing, market and opinion research, and the development of the controller's business, and to restrict the processing of personal data concerning them, as well as the right to have personal data concerning them already registered for that purpose erased, even if there were another basis for processing the data.

Withdrawal of consent

If the information in the register is based on the consent given by the data subject, consent can be revoked at any time by notifying the representative of the controller mentioned in this privacy policy. Upon request, all information that is not or cannot be retained under law or any other ground mentioned in this privacy policy will be erased.

Procedure for exercising rights

A review, correction, or other request may be made by contacting the controller's customer service through the contact details mentioned in this privacy policy.

Disputes

The data subject has the right to refer the matter to the Data Protection Ombudsman if the controller does not comply with the data subject's request for correction or other request.