

Privacy Policy

This privacy policy for Luola Consulting Oy is in accordance with the Personal Data Act (sections 10 and 24) and with the EU General Data Protection Regulation (GDPR).
Last updated 04/25/2022.

- 1 Data controller**

Luola Consulting Oy
Business ID 2969571-5
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FI20100 Turku Finland
cave@luolaconsulting.fi

- 2 Contact person in matters related to the filing system**

Turo Rautaoja
turo.rautaoja@luolaconsulting.fi

- 3 Name of filing system**

Customer register

- 4 The basis and purpose of personal data processing**

Personal data processing is based on the customer relationships between the data controller and the data subject. Personal data will be processed for enabling the production of services, for maintaining the customer relationship, for invoicing tasks, and for enabling the company accounting.

Data processing can be outsourced to third party service providers that are not the data controller for tasks deemed necessary (e.g. for accounting and invoicing tasks) in accordance with and within the boundaries of the data protection legislation. Data will not be used for automated decision-making or for profiling.

- 5 Data content of filing system**

The register contains of the following material: documentation related to the contracts between the data controller and the data subject; data collected for invoicing and accounting; files the data subject has delivered for an assignment; and files the data controller has created for enabling service production (translation memories, term bases).

For the purpose of invoicing and accounting, the following types of information on the data subject can be stored:
The name or company name of the customer, business ID, the name of a company contact person, address, email address, phone number, information related to purchased services and invoicing. The company accounting is outsourced to Tilitoimisto Erholtz Oy.

Contracts contain data given by the data subject and relating to the content of the contract, such as the name and contact information of the data subject, and information about the terms and conditions of the supplied services. Translation memories (used to support services purchased and provided) contain the texts sent for translation or review and the translations produced. Translation memories may contain such personal data that is included in the texts delivered by the data subject. Term bases are files created by the data controller that contain terminology relevant to the assignments given to the data subject for enabling the production of services.

Contract material will be stored for their duration. Translation memories and term bases will be stored as long as they are relevant for customer relationship management. Translation memories and term bases as well as other files provided by the client will be destroyed three years after the final assignment delivery at the latest.

- 6 Regular data sources**

The data stored in the register is received primarily from the data subject themselves and primarily via email or other electronic option. Data can be received from partners, with the data subject's consent.

**7
Regular disclosure of data and transferring data outside the EU or the EEA**

Data can be transferred to partners with the consent of the data subject and to the extent needed for enabling the production of services. The data controller will ensure that data transferred to a partner will be handled confidentially.

Data will not be disclosed to any party involved in the production, development, or maintenance of services and communications on behalf of the controller, except in accordance with an agreement, a separate consent and/or specific legislation.

As a rule, personal data are not transferred outside the European Union or the European Economic Area. However, data may sometimes be transferred to other countries to enable delivery of services. In such an event, we always ensure the safe processing of personal data in accordance with applicable legislation.

**8
Filing system's principles of protection**

A Manual material

Manual materials (e.g. paper copies of contracts and business cards received from customers) are stored in a locked space that can be accessed only by authorised persons. Contracts will be safely disposed of after they expire.

B Electronically processed data

Electronic material will be stored in a cloud service located in Finland, and if necessary, on the computers of the data controller's employees. The devices used for data storage are protected by passwords and firewalls, and only persons authorised by the data controller are allowed access. Data can be transferred to an external storage drive located in a locked space for backup purposes or for enabling the production of services.

Translation memory and terminology files are always client-specific. They are handled in such way that one file contains only data related to the commissions received from the client in question. This is done to ensure that a client's data is not mixed with another client's data.

The purpose of the above actions is to ensure the confidentiality of the personal data stored in the register, the availability and integrity of the data and the enforcement of the rights of the data subjects.

**9
Right of access and right to rectification**

The data subject has the right to verify the data stored in the register and to request the correction of any incorrect information or supplementation of incomplete information. If the data subject wants to check the data stored about them or to request a correction, they must send the request in writing to the controller. The data controller may ask the applicant, if necessary, to prove their identity. The controller will respond to the customer within the timeframe provided for in the EU Data Protection Regulation.

**10
Other rights related to the processing of personal data**

The data subject has the right to request the removal of personal data concerning them from the register ("right to be forgotten"). Likewise, the data subjects have other rights under the EU General Data Protection Regulation, such as restricting the processing of personal data in certain situations. Requests must be sent in writing to the controller. The data controller may ask the applicant, if necessary, to prove their identity. The controller will respond to the customer within the timeframe provided for in the EU Data Protection Regulation.

**11
Contacting**

In all matters relating to the processing of personal data and in the exercise of their rights, the data subject should contact the controller by post or e-mail.