

# Privacy statement and description of data file

## Cielo user register

This is SSA Digi Oy's privacy statement and description of data file in compliance with the EU's General Data Protection Regulation (GDPR) and sections 10 and 24 of the Personal Data Act (Henkilötietolaki 523/1999). Compiled 18.5.2018. [Latest revision – \(original\)](#)

### 1. Controller

SSA Digi Oy  
Voimatie 6 C  
FI-90440  
KEMPELE  
Business ID: 2324297-7

### 2. Person responsible for data file

Teemu Saari  
teemu@ihme3d.com  
tel. +358 44 3561782

### 3. Name of data file

Cielo system user register

### 4. Lawful basis for and purpose of personal data processing

According to the EU's General Data Protection Regulation, lawful bases for the processing of personal data include

- a contract, to which the data subject is party: Cielo user terms
- the controller's grounds of legitimate interest (e.g. a customer relationship)

Personal data is processed for user identification when logging into the system, customer contact, maintenance of the customer relationship, and marketing. Data will not be used for automated decision-making or profiling.

### 5. Content of the data file

Data which is recorded on the data file includes: the person's name, e-mail address, user credentials/profiles in social media services, information about ordered services and changes to ordered services, invoicing information, and other information relating to the customer relationship and ordered services. Data will be stored for as long as necessary with regard to contractual and statutory obligations and will be anonymised no later than 20 years after the customer relationship ends.

### 6. Regular sources of data

Data which is recorded on the data file is obtained from the customer from e.g. messages sent via online forms, e-mails, telephone calls, social media services, contracts, customer meetings and other situations in which the customer discloses their data.

## 7. Regular disclosure of data and data transfer outside of the EU or EEA

Data will not regularly be disclosed to other parties. Data can be published when the customer has agreed to publication.

Data can also be transferred by the controller outside of the EU or EEA. This can occur for example if a contract between the customer and a company operating outside of the EU or EEA requires the transfer of data. Data will only be transferred at the customer's request.

## 8. Principles of data file protection

Due care will be taken when processing the data file, and data that is processed using information systems will be appropriately protected. When data file data is stored on Internet servers, the physical and digital data security of the equipment will be appropriately ensured. The controller will ensure that the stored data, user rights to the servers, and other information that is critical to the security of personal data are processed confidentially and only by those employees whose job description involves personal data processing.

## 9. Right to access personal data and to request rectification

Every person on the data file has the right to access the data about themselves that has been recorded on the data file and to request the rectification of inaccurate or incomplete personal data. If a person wishes to access their data or have it rectified, a request should be sent in writing to the controller. If necessary, the controller can request the person submitting the rectification request to provide personal ID to verify their identity. The controller will respond to the customer within the time outlined in the EU's General Data Protection Regulation (primarily within one month).

## 10. Other rights relating to the processing of personal data

A person on the data file has the right to request that their personal data is erased from the data files ("the right to be forgotten"). The data subject also has other rights as set out in the [EU's General Data Protection Regulation](#), such as restricting personal data processing in certain situations. Requests should be sent in writing to the controller. If necessary, the controller can request the person submitting the rectification request to provide personal ID to verify their identity. The controller will respond to the customer within the time outlined in the EU's General Data Protection Regulation (primarily within one month).