



## OFFICIAL DISCLOSURE OF DATA PROTECTION

Updated October 19<sup>th</sup> 2020

This disclosure of data protection describes the principles by which Concordia gathers, uses, protects, and provides customers' or employees' personal data. This disclosure of data protection does not apply to other actors Concordia cooperates with (SEKES, governmental authorities). We ask that you familiarize yourself with those actors' disclosures of data protection to learn how they use customer information.

### I. Information we collect

We may collect your personal data if you visit our company, use our services, or contact us through other means. The data that we collect can be divided into four categories: (a) data that you provide us directly; (b) data that we collect automatically; (c) data that we have collected from other sources; and (d) data that we have collected during events.

We are able to combine data that you have given us directly with data that we have collected automatically, as well as with data that we have collected from other sources.

#### *We collect data that you provide*

You might provide us with the following personal data:

personal data like name, postal and email address, phone number, date of birth, and other contact information;

Personal Identity Code upon establishment of a company:

information provided in the use of services, whether free of charge or subject to a fee;

user account data, such as username or password, for accessing our online services and use of our services (or other identifying information);

profile information, such as which industry you work in; as well as

additional personal information that you decide to provide us with.

#### *We collect data automatically*

We collect public data about newly established and closed companies automatically once a month and save them to Concordia's customer relationship management system. The data is also published in the Jakobstad region business and service directory.

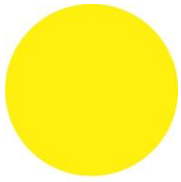
<https://concordia.yrityshakemistot.fi/> Via the business directory e-form, it is possible to update, change and remove information about your business.

#### *We collect data from other sources*

We can collect your data from official authority registers (for instance, from the Finnish Patent and Registration Office's company information system) or information about you that is in other ways publicly available.

We can collect your data from other companies or organizations.

We are, for example, able to collect information about you if you are in contact with us through social media.



#### *Data that we collect during our events*

Data collected during registration to our events: first and last name, email address, telephone number, company/organization and any special dietary requirements. If needed, we can share the participants information such as name and company/organization on a participant's list or name tags in conjunction with distributing other type of event material. The purpose of this is to promote networking between participants. As a part of registration, the participant can voluntarily register as a subscriber to our newsletter.

During events we take photos, which are then saved on Concordia's secure server. Registration to an event means that the participant agrees to photographic material from the event being published.

Digital events: (i.e. Zoom) the participant can fill out the personal data (name) they want to have visible. Concordia recommends the use of first name and last name to promote networking between participants. Video image can be used during certain digital events to promote networking. If the host of the event is other than Concordia, the participants registration information will be shared with this host. If the event is recorded, you will be informed of this at the beginning of the event. The participants names and chat discussions might therefore be seen afterwards in the recorded material. The recording will not be saved longer than necessary and is secured by password. For more information, see Zoom privacy policy. When logging in to the Zoom-meeting or webinar, you are making an active choice to participate and that your personal data (name, possibly video, chat discussions) are shown according to the description above.

## **2. How we use data that we have collected**

We may use the data:

to answer your requests, to serve you, and to process fees for our services; to inform you about our services, competitions, campaigns, projects, or special events that might be of interest to you (unless you opt-out of direct marketing);

to inform you of our collaborators' products and services (unless you opt-out of direct marketing); to contact you concerning a request, service, questions, and comments;

to carry out our business, including the development of new products and services, to conduct customer surveys, as well as for selling, marketing, and advertising, and analyzing their effect; to maintain, control, and develop our services, online services, and other technology; to protect against fraud and other crimes, demands, and responsibilities, to identify and prevent them; as well as to follow applicable law. We may also use your personal data in other ways, which we will inform you of when we collect data, or when we ask your permission to process data. Our legal claim in processing personal data is based on a professional connection between parties (in order to process the customer interaction). The data can also be processed based on your consent. On our homepage, and through our additional information channels, we may publish photos taken during events.

## **3. How we share information that we have collected**

The company does not sell your personal data, and only provides your information as described in this disclosure of data protection. Your personal data may be provided to other entities in order to carry out a service and promote your interests (for example to financiers). Entities that



receive personal data do not have the right to provide the data to other actors in any ways other than those described in this disclosure of data protection.

We may transfer your personal data to partners that supplement our services, such as, financing, information processing, and other information technology services. We do not permit these service providers to use or transmit data for any other purpose than that of furthering your interests. We reserve the right to, due to strategic or other commercial reasons, decide to sell or transfer our business completely or partially. As part of such a transaction or transfer, we may transfer data that we have collected and stored, including customer information, to anyone who is part of the sale or transfer of the business.

We may from time to time give out data that you cannot be directly identified with. We may, for instance, release anonymous statistical data. We have the right to use or transfer information, if it is necessary according to the law, constitution, or by lawful request; to protect technology; defend ourselves against legal claims or make them ourselves; protect our organization's, our employees' or the public's rights, interests, or safety; or in connection to the investigation of fraud, other crime, or rule-breaking.

#### **4. Data protection of minors**

With the consent of a guardian, the company processes the following personal data regarding company founders below the age of majority (under 18 years of age): name, contact information, education, date of birth, address information.

With the consent of a guardian, the company processes the following personal data regarding individuals participating in contests who are below the age of majority (under 13 years of age): name, contact information, education, address information.

#### **5. Your rights**

You have the right to check what information about you has been saved in the register. A written request for this check must be sent by email or mail. The request for a check can also be made in person to the registrar.

You have the right to decline direct marketing by clicking the link in direct marketing messages, by contacting the sender of the message, or the company. You own all of the personal data that you provide us with. Contact us if at any stage you wish to correct your personal data. In addition, in some situations you have the right to request that your personal data is removed from the register, or request for it to be sent to another company. You have the right to limit or oppose the processing of your personal data.

However, we do ask you to consider that, in certain situations, providing information and permitting processing can be a condition of being allowed to open an account or use a service. The company reserves the right to cancel the offering of, or access to, services if the registered person does not provide information that is necessary for the service, or demands that the data is removed.



We always strive to solve issues regarding the processing of personal data directly with the registered individual. If you are still unhappy with the processing of your personal data, you have the right to allow the data protection authority to investigate the matter.

## **6. Data protection**

We are responsible for ensuring the security of your personal data. Our technological, administrative and physical processes are structured in such a way that your personal data is protected against accidental, unlawful or illicit loss, access, disclosure, use, alteration, or destruction. Despite ensuring that our systems are protected, we cannot guarantee that the internet site, data system or transmission of the data, whether online or through some other public network, is completely secure.

## **7. Saving of personal data**

We save personal data only as long as regarded necessary for those purposes described in this disclosure of data protection, unless saving data longer than this is required or permitted by law.

## **8. International transfer of data**

Data is not transferred outside of Finland.

## **9. Changes to the disclosure of data protection**

This data protection disclosure is valid from the date cited above. The data protection disclosure is updated to reflect legislative amendments or developments in our services. The latest version of the data protection disclosure can be found on our website.

# **THE COMPANY'S DATA PROTECTION PRACTICES**

## **Description of processing practices:**

### **1 Data controller**

Jakobstad Region Development Company Concordia Ltd. Business ID 0872046-7  
Skolgatan 25-27 C, 68600 Jakobstad

### **2 Individual who processes registration matters and contact information**

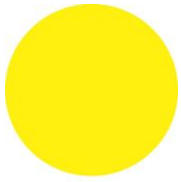
The assistant at Jakobstad Region Development Company Concordia  
info@concordia.jakobstad.fi  
+358 10 239 7550

### **3 The names of the registers**

Registers based on the customer relations of, and factual connections to, Jakobstad Region Development Company Concordia Ltd.

### **4 What personal data is used for**

Personal data is processed to take care of, develop, administrate, and analyze the customer



relationship, and to process relationships that are based on other factual connections (among other things electronic customer communication). Personal data is also processed in connection to marketing, including direct marketing and marketing undertaken electronically.

## **5 The register's information content**

Customer relations or other factual connections to the business of the data controller, that can be equated with a customer relationship, arise, for instance, when a registered person uses the services and electronic services (for example local registers) of the data controller. The company processes personal data in this register originating from a customer relationship or other factual connection or based on the consent of the registered individual.

In the register, the following types of data can be processed:

- first and last name, contact information (postal addresses, phone numbers, email addresses), language, date of birth, as well as, in connection to establishing a company and in processing of business support applications, Personal Identity Code, sex, education, and work situation.
- information about when the customer relationship, or other factual connection, started and ended.
- registration information in connection to electronic services, such as passwords or other kinds of identification information, and information provided through symbols in services on social media, as well as information regarding the usage of services.
- Customer responses and other contact relating to the customer relationship and professional connection, communication, and measures, including a registered company's business activities through social media.
- prohibition against direct marketing
- information about potential data safety offences
- information about the use of the registered person's rights.

## **6 Lawful information sources**

Personal data is collected by the registered individual, among other things, when the registered individual uses the data controller's services, or offers information about themselves. Information is also collected from public sources and other companies.

## **7 Giving out and transferring data**

Personal data can be given out within the limits permitted and obligated by current law.

In accordance with the law, data is not given to third parties.

Information is not given out outside the area of member states in the European Union, or outside of the European Economic Area.



## **8 Description of how the register is protected, and safety measures**

The databases belonging to the register are protected against data infringement from the outside with firewalls, passwords, and other technical measures. The databases and their back-ups are on locked premises.

Only identified employees who work at the commission of a company, has access to the data in the register through personal usage rights granted by the data controller.

The company has educated personnel regarding data protection, as well as provided internal instructions.

## **9 Amendments to the data protection disclosure**

The registered person has the right to check what personal data has been saved in the register. A request for a check is to be sent to the individual who processes registration matters, and it must be in writing. The request for a check can also be made personally with the data controller.

The registered individual has the right to limit processing. The registered individual has the right to forbid the processing and transfer of data about themselves by contacting the data controller. The registered individual has the right to demand that incorrect data is corrected by contacting the data controller.

The registered individual has the right to receive transparent information about the processing of personal data within one month of our receipt of a written request. In certain situations, the registered individual has the right to delete data, i.e., the right to be forgotten. The registered individual has the right to request information regarding recipients of such personal data, which the data controller must notify about restrictions on rectifications, deletion, and the processing of personal data.

The registered individual has the right to send information from one system to another.

## **10. Removing data**

We remove data when it is no longer necessary for the purposes described in this disclosure of data protection, unless saving it longer than this is implied or permitted by law.