

Fyra Oy Privacy Notice concerning marketing and contacts

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1 Controller

Fyra Oy (hereinafter “**Fyra**” or “**we**”)
 Business ID 2348231-3
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 00150 Helsinki
 Info@fyra.fi

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 +358 (0)40 582 8961

2 Whose personal data do we process?

The data subjects are contact persons and other representatives of our current and potential business clients and other stakeholders as well as other persons visiting our website.

3 How do we process your personal data?

| For what purpose do we process your personal data? | What types of data do we process? | What is the legal basis for processing? |
|--|---|---|
| Ensuring correct and accurate communications related to customer enquiries | Your basic information and contact details such as name, name of the company represented, email address and/or other information; | Our legitimate interests, art. 6(1)(f) GDPR <div style="border: 1px dashed black; padding: 5px; margin-top: 10px;"> <i>We have a legitimate interest to manage and operate our business and to communicate with clients' contact persons regarding our services</i> </div> |

| | | |
|--|---|---------------------------------|
| Direct marketing (Fyra's newsletter) | Your e-mail address. | Your consent, art. 6(1)(a) GDPR |
| Improving your experience when using our website, statistics and analytics | Information collected when visiting our website such as information about your device and browser, your IP address, visiting times, cookies and data related to using them. For additional information about our use of cookies, please see our cookie policy. | |

4 Where do we receive your data from?

We receive information primarily from you, the data subject, when you subscribe to a newsletter or otherwise contact us.

5 Profiling and automated decision-making

You are not profiled and no automated decisions concerning you are made based on your personal data.

6 To whom do we disclose data, and do we transfer data outside the EU or the EEA?

In order to carry out processing described in this privacy notice, we use subcontractors that process personal data on our behalf. We ensure that our subcontractors ensure the security and integrity of the personal data by using non-disclosure and data processing agreements.

In order to detect and investigate unlawful activities or to respond to legal proceedings or a lawful data request, we may need to disclose your personal data to authorities (such as courts or law enforcement authorities) or other third parties.

We store your data in the EU/EEA.

7 How do we protect the data?

We commit to ensuring that we and our service providers process personal data in a manner that ensures its security, integrity and confidentiality.

Only those of our employees, who on behalf of their work are entitled to process customer data, are entitled to use the systems containing personal data. The data is protected by firewalls, passwords and other technical measures. The persons processing data are bound by professional secrecy.

8 How long do we store your personal data?

We store the personal data that we have received through enquiries for 2 years.

Information concerning communication subscriptions and consents is stored as long as the subscription remains active. The personal data received for newsletters is processed for one month's time after you have unsubscribed the newsletter.

9 What are your rights as a data subject?

You always have the right to:

- Access the personal data stored by us concerning yourself
- Demand rectification of inaccurate or outdated data
- Lodge a complaint with the supervisory authority

Additionally, subject to certain conditions (left column), you may have the following rights:

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| When the processing is based on your consent in accordance with art. 6(1)(a) and | You have the right to withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. |
| You have withdrawn your consent, or if any other of the conditions to use “the right to be forgotten” (art. 17 GDPR) are met | You have the right to have your personal data erased . |
| You have contested the accuracy of personal data, or if any other of the conditions to use the right to restriction of processing (art. 18 GDPR) are met | You have the right to have the processing of your personal data restricted e.g. while your requests related to your personal data are investigated and resolved. |
| When the processing is based on your consent or a contract and where the processing is carried out by automated means | You have the right to transmit your data to system maintained by another controller (if it is technically feasible and as far as your request concerns information provided to us by yourself) |
| When the processing is based on our legitimate interest (art. 6(1)(f) GDPR) | You have the right to object to processing of your personal data on grounds relating to your particular situation. |

How to use your rights:

All contacts and requests concerning the rights mentioned above should be made in writing to the contact person mentioned in the beginning of this privacy notice. Your request should include your name and contact details. Please note that when submitting a request concerning your rights, we may ask you to provide additional information in order to verify your identity – this information is not used for any other purposes and is deleted after identification.

We will answer your contacts and requests related to your rights as a data subject within one month.