

PRIVACY NOTICE

Your privacy and keeping you informed on processing your personal data is important to us. This Privacy Notice provides you information on how we collect and process personal data of our clients, potential future clients and our business contacts.

Data controller: Greip IP Solutions Oy, part of Berggren Group

Address: Eteläinen Rautatiekatu 10 A, PL 16, 00100 Helsinki

Phone: +358 10 227 2000

1. Data controller and processors

Greip IP Solutions Oy is the data controller for the data collected and processed as described in this privacy notice. Greip IP Solutions Oy uses the following processors, subject to appropriate safeguards in agreement with said processors, in processing the personal data collected hereunder:

- Server infrastructure provider (currently Equinix, Microsoft)
- Email, office application provider (currently Microsoft)
- CRM provider (currently Hubspot Inc)
- Helpdesk ticketing software provider (currently Zendesk Inc)
- Financial application provider (currently Visma)
- HR software provider (currently Sympa Oy)
- Recruitment software provider (currently Talentadore Oy)

Personal data is only transferred outside the EU/EEC to countries without an adequate level of data protection subject to standard contractual clauses (SCC) or other appropriate safeguards as foreseen under Article 46 of the General Data Protection Regulation ("GDPR"). Data subjects have the right to request a copy from Greip IP Solutions Oy of the annexes to the aforementioned standard contractual clauses.

2. Categories of personal data and legal basis for processing

Category of personal data and primary data sources	Purpose of use	Legal basis for processing	Removal of personal data
Client contacts person information, such as name, email, address, phone number(s), employer, title, or position as provided by you as registered person or the company represented by you	Providing services for the client, managing client relationship, providing information to client relating to client relationship	Processing is necessary for performance of contract between Greip IP Solutions and client (GDPR Article 6(1)(b))	Upon ending of client relationship (and any preceding processing period) unless a legal obligation or the need to defend Greip IP Solutions' interests requires that the personal data is stored for a longer period
	Carrying out conflict checks, anti-fraud/money laundering checks or other obligatory clearances required under applicable ethical standards or legislation	Processing is necessary for the purposes of the legitimate interests pursued by the controller, (GDPR Article 6(1)(f))	
Potential new client contacts person information, such as name, email, address, phone number(s), employer, title, or position as provided by you or as available public sources such as company website	Marketing and sales efforts with regards to potential new clients, i.e., soliciting a business relationship with the client	Processing is necessary for the purposes of the legitimate interests pursued by the controller, (GDPR Article 6(1)(f))	At the latest one year after the data has been collected, if the new potential client does not become a new client or at the latest one year from the last communication with the potential client
Participants (contact information) of our webinars and events as provided in the webinar or event registration	Marketing and sales efforts with regards to potential new clients, i.e., soliciting a business relationship with the client	Processing is necessary for the purposes of the legitimate interests pursued by the controller, (GDPR Article 6(1)(f))	At the latest one year after the data has been collected, if the new potential client does not become a new client
IP address of persons visiting the website, security identifiers (ReCAPTCHA) of contact form submissions	Preventing malicious misuse of website	Processing is necessary for the purposes of the legitimate interests pursued by the controller, (GDPR Article 6(1)(f))	At the latest one year after visit to website unless a legal obligation or the need to defend Greip IP Solutions' interests requires that the personal data is stored for a longer period
Information for recruitment purposes of potential employees: name, contact information, individual identifying number in HR system, any personal information submitted by applicant in open fields of recruitment form and in annexes provided by the applicant	Launching and handling the recruitment process for the applicant	Processing is necessary for performance of contract between potential employee and Greip IP Solutions Oy (GDPR Article 6(1)(b))	All this personal data will be removed within 12 months of the applicant submitting the application to Greip IP Solutions Oy

3. Data security

Greip IP Solutions Oy protects the personal data described in this privacy notice with appropriate technical and organisational measures, and obligates its processors to do the same. The company maintains a high level of data security to protect the confidentiality of the personal data (and other client data) collected and processed in its operations, including safeguards against data breaches, unlawful processing of personal data, accidental or unlawful alteration, destruction, or disclosure of said data. The measures undertaken by the company, such as encryption of data and limiting access to personal data have been implemented based on a risk analysis regarding the likelihood of and potential impact of data breaches, the sensitivity of the personal data processed hereunder, the way that the personal data is stored/kept, and advancements in data security technology. Processing of your personal data is limited to personnel who needs to access data for the purposes above while we provide our services. We provide training to our personnel regarding privacy, data protection and security.

4. Rights of data subjects

Under the GDPR, data subjects have the following rights (as more closely provided under Article 15-21 of the GDPR):

- a. Right of access: data subjects have the right to request whether their personal data is being processed, as well as access to said personal data
- b. Right to rectify: data subjects have the right to request the data controller to rectify any errors or omissions in their personal data
- c. Right of removal: data subjects have the right to request the data controller to remove any of their personal data that is no longer needed for the purpose for which it was collected or processed, regarding which the data subject objects to processing and there is no legitimate basis for the processing, which is being processed unlawfully or must be removed to satisfy a legal obligation
- d. Right to restrict processing: the data subject has the right to restrict the processing of his or her personal data in the event the accuracy or veracity of the personal data is disputed, if the personal data is being unlawfully processed, if the data controller no longer needs the personal data but the data subject legitimately objects to the removal of the personal data, or if the data subject objects to the processing but it has not yet been determined whether there is a legitimate basis for said processing
- e. Right to object: the data subject has the right to object to the processing of his or her personal data to the extent said personal data is being processed subject to Article 6(1)(f) of the GDPR, in which case the data controller must in order to continue processing show that there is a legitimate basis for the processing of said personal data
- f. Right to data portability: data subjects have the right to receive a copy of the personal data relating to them and to have said personal data transferred to another data controller in so far the legal basis for the processing of said personal data is Article 6(1)(b) of the GDPR
- g. Right to notify data protection authority: data subjects have the right to complain about the processing of their personal data to the appropriate data protection authority, which with regards to Finland is the Data Protection Ombudsman (<https://tietosuoja.fi/en/office-of-the-data-protection-ombudsman>)

5. Contact details

The person responsible for data protection at Greip IP Solutions Oy is Aleksanteri Aaltonen (aleksanteri.aaltonen@greip.com).

In general, the contact information for data protection at Greip IP Solutions Oy is the person responsible above. Data subjects can contact this address if they wish to exercise their rights as data subjects or require more information about the personal data practices and policies of Greip IP Solutions Oy.

6. Amendments to this privacy notice

Greip IP Solutions Oy updates its privacy practices and policies from time to time. Greip IP Solutions Oy may amend this privacy notice by posting a new, updated version of the notice on its website. In the event substantial changes are made, Greip IP Solutions Oy endeavours to notify data subjects either with a notice on its website or by sending a separate notification via, e.g., email.