

Email conversation register - privacy policy

Creation date	3.12.2021
Data controller	Costo Oy Meritullinkatu 11 C, 3.krs +358 40 170 5852 info(a)costo.fi
Contact person in matters related to the filing system	Hannes Bengs Meritullinkatu 11 C, 3.krs 00170 Helsinki, Finland +358 40 170 5852 info(a)costo.fi
Name of filing system	Mailing list
Purpose of personal data processing	<p>The legal bases of processing data is legitimate interest.</p> <p>The purpose of use for the filing system is to enable the company's email correspondence.</p> <p>Collected data (email address as well as possible contact information in the messages) are used to create and maintain customer relationships as well as to carry out other communicational tasks.</p>
Legitimate interest basis	The legitimate interest of the controller in the processing of personal data collected and used is based on the freedom to conduct a business in European Union.
Categories of personal data in question	
Recipients and recipient groups	The data controller's personnel and outsourcing partners when applicable.
Concent	
Data content of filing system	<p>Personal data filing system contains the following information:</p> <ul style="list-style-type: none">- First and last name of person- Community represented- Email address- Postal address- Phone number- Information on previous orders- Data on discussions held between correspondents
Regular data sources	<p>Data is collected from email messages received from customers.</p> <p>Data can also be received from interest groups for example through mass communication, message groups, forwardings and other such communicational events.</p> <p>Data will not be disclosed to external parties or to the company's partners except for purposes related to credit applications, debt collection or invoicing as well as in situations required by law. Personal data will not be transferred outside the European Union unless necessary for ensuring the technical implementation of the company's or its partners' activities. A data subject's personal data will be removed upon the data subject's request unless such removal is prohibited by legislation, matters related to the</p>

	management of the customer relationship, outstanding invoices, or debt collection.
Storage time	The data will be kept for 10 years.
Regular disclosure of data	<p>Mailing list data are used solely by the company, except when an external service provider is used either to provide added value services or to support credit-related decision-making.</p> <p>Data will not be disclosed to external parties or to the company's partners except for purposes related to credit applications, debt collection or invoicing as well as in situations required by law.</p> <p>A data subject's personal data will be removed upon the data subject's request unless such removal is prohibited by legislation, matters related to the management of the customer relationship, outstanding invoices, or debt collection.</p>
Transferring data outside the EU or the EEA	Personal data will not be transferred outside the European Union unless necessary for ensuring the technical implementation of the company's or its partners' activities.
Filing system's principles of protection A: Manual material	Manually processed documents containing customer data (e.g. printed emails or their attachments) are, after initial processing, stored in a locked and fireproof space. Only specific employees who have signed confidentiality agreements have the right to process manually stored customer data.
Filing system's principles of protection B: Electronically processed functions	<p>Only specific employees working for or on behalf of the company have the right to use the mailing list and maintain its data. Each specific user has his or her personal username and password. Each user has signed a confidentiality agreement. The system is protected by a firewall to prevent external attacks on the system.</p> <p>System security is ascertained with regular S.T.A. audits.</p>
Rights of the data subject	<p>According to the General Data Protection Regulation (GDPR), data subjects have the right</p> <ul style="list-style-type: none"> to obtain information on the processing of their personal data of access to their data to rectification of their data to the erasure of their data and to be forgotten to restrict the processing of their data to data portability to object to the processing of their data not to be subject to a decision based solely on automated processing.
Cookies	<p>We use cookies on our website. A cookie is a small text file that is sent to and stored on the user's computer. Cookies do not cause any harm to the user's computer or files. The primary purpose for the use of cookies is to improve and personalise a visitor's user experience on our website as well as to analyse and improve the functionality and content of our site.</p> <p>Data collected with cookies can also be used in targeted communication and marketing as well as optimising marketing activities. Visitors cannot be identified based solely on cookies. However, data collected with cookies can be linked with possible data received from the user in other situations, for example when the user fills in a form on our website.</p> <p>The following types of data are collected using cookies:</p> <ul style="list-style-type: none"> - visitor's IP-address - time of visit - browsed pages and time of browsing

	<p>- visitor's browser - other?</p> <p>Your rights A user visiting our website has the right to prohibit the use of cookies at any time by changing his or her browser settings. Most browser software give the option of disabling cookies and of removing cookies that have already been saved.</p> <p>Disabling cookies may affect the functionality of the website.</p> <p>GOOGLE ANALYTICS We collect user statistics from our website using the Google Analytics service, the purpose of which is to monitor site activity, improve site functionality and develop marketing. The data collected cannot be linked to individual users or persons.</p> <p>Additionally, we collect Google Analytics Demographics data, which includes for example the age and gender of the visitor as well as topics of interest. Settings related to the collection of these data can be changed using your personal Google account at https://www.google.com/settings/ads</p> <p>Google Analytics -monitoring can be disabled with a Chrome add-on.</p>
Information source	
Automatic processing and profiling	
Right of access	<p>The data subject has the right to check what data has been stored about him or her in the filing system. A request for data access must be given in writing by contacting the company's customer service or the filing system's contact person either in Finnish or English. The request for data access must be signed. The data subject has the right to prohibit the processing of his or her data and its disclosure for the purposes of direct marketing, distance marketing or opinion polls by contacting the company's customer service.</p>
Right to lodge	<p>If you consider that an infringement of the General Data Protection Regulation has occurred in the processing of your personal data, you have the right to lodge a complaint with a supervisory authority.</p> <p>The complaint can also be lodged in a member state where you are a permanent resident or where you are employed.</p> <p>Contact information for the Finnish national supervisory authority: Office of the Data Protection Ombudsman PL 800, Lintulahdenkuja 4, 00530 Helsinki tel. +358 29 566 6700 tietosuoja@om.fi www.tietosuoja.fi/en/</p>
Right of portability	<p>The data subject has the right to transfer his or her own data from one system to another.</p> <p>The transfer request can be addressed to the registry contact person.</p>
Right to rectification	<p>Taking into account the purposes of processing, any data stored in the filing system that is inaccurate, unnecessary, incomplete, or outdated must be erased or rectified.</p> <p>A written request for rectification, signed by hand, should be sent to the company's customer service or the personal data filing system's administrator.</p> <p>The request should specify what information should be rectified and on what grounds. Rectification shall be carried out without delay.</p> <p>Notification of rectification will be sent to the party who provided the inaccurate data or to whom the data were disclosed.</p>

	<p>If a request for rectification is denied, the responsible person of the filing system will provide a written document stating the grounds for the denial of the request for rectification. The data subject concerned may then pass the matter along to the Data Protection Ombudsman.</p>
Other rights related to the processing of personal data	<p>Right to restrict processing The data subject has the right to request that the processing of their personal data is restricted for example if data stored in the filing system is erroneous. Requests should be sent to the responsible person of the filing system.</p> <p>Right to object The data subject has the right to request for personal data pertaining to them, and the data subject has the right to request for the rectification or erasure of said data. Request can be sent to the contact person of the filing system.</p> <p>If you are acting as the contact person of a company or organisation, your data cannot be erased during this time.</p> <p>The data subject has the right to prohibit the disclosure of processing of personal data for the purposes of direct marketing or other marketing, the right to demand the anonymization of data where applicable, as well as the right to be completely forgotten.</p>