# Corporate customer data file

Privacy policy for the corporate customer and marketing data file of the PlusTerveys Group

#### 1. Controller

PlusTerveys Group, Malmin asematie 6, FI-00700 Helsinki, Finland.

#### 2. Contact person in matters concerning the data file

Head of Information Security Petri Hammar, tel. 09 351 040

#### 3. Name of data file

PlusTerveyden yritysasiakas- ja markkinointirekisteri ('Corporate customer and marketing data file of the PlusTerveys Group')

#### 4. Purpose of processing personal data

The corporate customer and marketing data file is used to maintain the information of the contact persons of PlusTerveys' existing and potential corporate customers. In this context, corporation may refer to businesses or other collectives.

Personal data may be processed for the following purposes:

- Management, development, allocation and monitoring of marketing, communications and sales
- Management of customer relationship and customer service
- Analysis, categorisation and reporting of the customer relationship and other purposes related to developing the overall customer relationship and the business operations of PlusTerveys
- Collection and processing of customer feedback
- Conducting market research and polls
- Recording the telephone calls of the customer service centre to verify service events, ensure and develop customer service, legal protection and safety and for training purposes.

Some of the processing of personal data may be outsourced to Group companies and/or external service providers.

#### 5. Data content of the data file

The following types of information, for example, can be saved in the data file:

• Contact person's first and last name, gender, title, status and contact details in the company

- Mailing lists (e.g. customer magazines, newsletters)
- Information related to offering, purchasing, using and developing services as well as marketing and sales
- Other information necessary for the management or development of the customer relationship

#### 6. Regular sources of data

Data is primarily obtained from the following sources:

- The company and the contact person
- PlusTerveys, interest groups of PlusTerveys and external service providers, such as directory service companies and public data files
- Other appropriate sources

# 7. Regular disclosures of data and transfer of the data outside the European Union or the European Economic Area

Personal data will not be disclosed outside PlusTerveys or parties working on behalf of PlusTerveys in service production, development and maintenance unless under an agreement, other consent and regulations. Primarily, personal data will not be transferred outside the European Union or the European Economic Area.

#### 8. Description of the protecting principles of the data file

Any manual materials will be stored in a locked facility accessible only to authorised individuals. Digital materials may only be accessed by an authorised employee or professional with their personal username and password. There are various levels of access rights and each user is given access rights that are suited for their duties but as restricted as possible.

# 9. Right of access

The data subject has the right of access to personal data which have been collected concerning him or her in the PlusTerveys data file. The access request is made in writing on in another authenticated manner and addressed to the controller who decides on the right of access. The identity of the data subject is confirmed with a picture ID before disclosing the data. The right of access may be rejected on grounds stipulated in legislation. Using the right of access is free of charge when used no more than once a year.

# 10. Rectifying the data

Insofar as the data subject is personally able, they are asked, without undue delay, after being informed of an error or after detecting an error, to take initiative in rectifying, erasing or supplementing any inaccurate, unnecessary or expired data in the data file.

Otherwise, the data subject is asked to update the data by calling 09 351 040 or reporting any changes via e-mail to palvelu@plusterveys.fi.

### 11. Right of refusal

You may forbid PlusTerveys from processing personal data concerning you for the purposes of direct marketing in accordance with section 27 of the Finnish Data Protection Act by reporting the changes via e-mail to palvelu@plusterveys.fi or by following the instructions in the electronic marketing message.