

# Privacy Policy in accordance with Sections 10 and 24 of the Personal Data Act (523/1999)

## 1. Data Controller

HRK-Konevuokraamot Ltd  
Business Identity Code: 0147835-6  
Lentolantie 24  
36220 Kangasala  
Finland

## 2. Person in Charge of the Register

Marjo Elojoki  
[marjo.elojoki@hrk.fi](mailto:marjo.elojoki@hrk.fi)  
tel. +358 40 152 6993

## 3. The Name of the Register

The Customer Register of HRK-Konevuokraamot Ltd

## 4. Intended Use of the Register

The data in the register can be used to maintain and review the data subject's contact information and other information relevant to the customer relationship. The purpose of the register is to safeguard the rights, responsibilities, and obligations of both the controller and the customer. The register serves as a basis for all business operations. The data is processed when concluding leases and in connection with invoicing and credit monitoring. Based on the data in the register, information on possible payment defaults is forwarded to the collection agency. In addition, the data in the register is processed in customer communication, marketing, development of the activities of the controller, statistics, analysis, and other customer relationship management activities.

## 5. Information in the Register

The register may contain the following information:

- name of the company or the personal customer
- Business ID or personal identification number
- contact information (billing information, email address, phone number, address, etc.)
- the company's contact persons' names, contact details and positions in the company
- information related to trading (incl. agreed discounts)
- terms of the customer relationship
- information about invoices and contracts
- client information, construction site information and other necessary information provided by the customer
- credit history and risk class of companies
- information related to billing and debt collection
- business sector of the customer company
- data controller's identification data (e.g. customer number)
- company website address
- information about the data subject's current and future building sites
- identification data and information on the use of services related to the use of the online service provided by the controller
- information on the duration of the customer relationship and the business between the data subject and the controller
- other additional information relevant to the customer relationship

## 6. Regular Sources of Information

As a rule, the data in the register is collected from the customers themselves in connection with the hire when concluding the contract. If necessary, the information is supplemented when the data subjects notify us of changes or with information available from the data subjects' own websites and other public registers. Some information, such as information about the building sites, may have been purchased from a third party. The data subject is not obliged to disclose all the information mentioned in the Privacy Policy, but the provision of certain personal data is a prerequisite for the use of the services provided by the controller.

## 7. Regular Disclosure and Transfer of the Data

The controller shall not disclose the data to third parties, except in cases of misconduct or claims transferred to a debt collection agency. Data may also be disclosed to the authorities upon separate request. Personal data will not be transferred outside the European Union or the European Economic Area unless it is necessary for the technical implementation of the service.

## **8. Protection of the Register**

The database in which the register is stored is protected by the necessary technical means required by current legislation. The controller ensures that the personnel have access to the data in the register only to the extent necessary for the performance of their duties. Access to the system requires the user to enter a username and password. The controller shall ensure adequate training and guidance for the employees in data protection matters. Manually processed registers are stored in a locked space. The registers on portable and smart devices are protected by a password, fingerprint identification or other similar protection. The controller may outsource the processing of personal data to a third party, in which case the controller guarantees by contractual arrangements that the personal data will be processed in accordance with current legislation and EU regulations. The protection of the personal data found in the online service has been adequately managed by the controller, but the protection regarding a secure username and password is the responsibility of the data subject.

## **9. Data Storage Period**

The controller processes only the data necessary for its operations and the data is stored only for as long as it is necessary for the purpose of the processing. The data of the customers whose customer relationship has not been active during the last two years are removed from the register every year. The data in the register is processed for the duration of the customer relationship and in some cases also after the end of the customer relationship, in which case there is a legal basis for the processing, that is, it is based, for example, on the legitimate interest of the controller.

## **10. Right of Inspection, Prohibition and Correction**

The data subject has the right to inspect and correct his or her data. The data subject also has the right to request the deletion of his or her data, in which case the deletion of the data shall be carried out without delay, if there are no sufficient grounds for retaining it. A request for inspection, correction or deletion must be submitted in writing and signed in person to the controller so that identity can be verified. The request may be submitted to any office of the controller from which the request is forwarded to the Data Protection Officer. The data subject has the right to prohibit the use of his or her data for direct marketing and the right to demand the correction of his or her inaccurate data by contacting the person responsible for the register. The controller shall respond to requests for inspection and correction of the register information and other inquiries within five working days at the latest.