

17 May 2021

Privacy Policy on Internet and Electronic Communication Services Register

Data Controller	TECHNOPOLIS HOLDING PLC, Business ID 0487422-3, Address: Elektroniikkatie 8, 90570 Oulu, Finland, on its own behalf and on behalf of companies belonging to the same group which act as joint controllers as applicable.
Contact Person for Data-Related Matters	Risto Kivisilta, Energiakuja 3, 00180 Helsinki, tel. +358408400380, email: risto.kivisilta@technopolis.fi
Name of Register	Privacy Policy of Internet and Electronic Communication Services Register
Legal Basis and Purpose of Processing Personal Data	<p>The processing of personal data is based on (i) the compliance with a legal obligation to which the controller is subject, and (ii) the legitimate interest of the controller, on the basis of which the information required for the operation of the internet and electronic communications services is processed for the purposes described below. Compliance with a legal obligation refers to traffic and other communication data that the controller is obliged to store as corporate or association subscriber under applicable legislation concerning internet and electronic communication. Legitimate interest refers in this case to the legitimate interest of the controller in using the tools that are essential to carrying out the internet electronic communication services needed for the organization of the company's business operations, including enabling internet and electronic communication services to be used by data subjects holding the right to use the services, and for troubleshooting of internet and electronic communication services.</p> <p>The processing of personal data is intended to enable the controller to implement internet and electronic communication for the employees and other representatives of its customers or partners.</p>
Data Content of the Register and Data Subjects	The register is used for processing the personal data of the person using internet and electronic communication services provided by the controller. Processed personal data contains full name, email address (Technopolis ID), IP address and MAC address, device type and model, phone number, pseudonym, username, network login/logout events and password. Controller does not process traffic data under the register unless traffic data is considered personal data.
Regular Sources of Data	Register's data is collected regularly from the data subjects themselves or data subject's employee and from the internet and communication system.
Regular Disclosure and Transfer of Data, and Data Transfer Outside the EU or EEA	The controller regularly discloses certain registered data to the telecommunication operator providing internet and electronic communication services to the controller. The current operator is a Finnish public limited liability company Elisa Plc with its group companies, who act themselves as controller of such personal data. As the controller Elisa processes personal data according to mandatory legislation and Elisa's data protection principles valid at the time. Elisa's current data protection

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	<p>principles as well as more information about Elisa’s processing of personal data can be found at: https://elisa.fi/tietosuoja.</p> <p>The controller does not otherwise regularly disclose the registered data to third parties.</p> <p>In order to carry out data processing in accordance with this privacy policy, the controller may use subcontractors to assist with the provision of electronic communications services and related data processing. The controller is responsible for the activities of its subcontractors to the same extent as for the controller’s own activities. The controller will ensure, by means of data processing agreements with subcontractors, that these parties are committed to protecting the personal data of the data subject in the manner stated in this document.</p> <p>Data is not regularly transferred outside the European Union or the European Economic Area. Some of the personal data described in this policy may be processed outside the EU and the EEA, in which case the data controller has ensured that its subcontractor is covered by applicable and adequate mechanism to comply with applicable data protection requirements (e.g EU Commission Model Clauses), and the controller ensures that personal data are protected by the appropriate technical measures (e.g. data encryption).</p>
<p>Principles of Register Protection and Data Storage Period</p>	<p>The only persons who have access rights to the personal data system are those employees of the controller who have the right to process personal data contained in this register for the purposes of carrying out their work. Each user has their own username and password for the system. Data is collected in databases that are protected by firewalls, passwords, and other technical measures. Databases and backups are located in locked spaces, and only certain pre-designated persons can access them.</p> <p>Personal data is retained as long as is necessary for the fulfilling the purpose for which the personal data was collected, and for as long as the informational content of the data is necessary for the use of the internet or electronic communication service or for monitoring and documenting its use. However, the controller always has the right to store personal data or otherwise process them after the aforementioned period of storage in the circumstances permitted by law in force from time to time.</p>
<p>Rights of the Data Subjects</p>	<p>The data subject has the right to inspect the data on him or her that is stored in the register, as well as to demand that any incorrect data be corrected, and that any data on him or her be deleted from the register. Any such requests must be submitted in writing personally to Technopolis’ reception service or to privacy@technopolis.fi.</p> <p>In accordance with the General Data Protection Regulation, the data subject has the right to object to or request restriction of processing of the data subject’s data, and to file a complaint against the processing of their personal data with the relevant supervisory authority.</p>