

PRIVACY STATEMENT - NEWSLETTER REGISTER

The General Data Protection Regulation (GDPR) (EU) 2016/679

Drafted 21.05.2018

Amended 26.1.2022

This document is biannually reviewed and, as appropriate, amended and adopted by the Management Team. The reviewed document shall replace the outdated document, and subsequent to any change, the data subjects shall be notified.

1. Name of register

Newsletter register

2. Data controller

Name

Gaia Consulting Oy

Address

Bulevardi 6 A, 00120 Helsinki, Finland

e-mail address: info@gaia.fi

Switchboard tel.no. +358 (0)9 6866620

3. Point of contact in matters related to register

Name

Operations Manager Mia Wikgren

4. Purpose of personal information processing and basis for processing

Personal information is dealt for delivering newsletters. The juridical basis for processing is person's own consent. The person's consent is expressed by ordering or continuing to order newsletters.

5. Data content of register

Personal information:

Name of the person, e-mail address.

6. Regular sources of data

Information is received upon registration by the person.

Gaia employees can control, add or amend registered information.

7. Recipients and recipient categories

Personal information is not disclosed to third parties. Personal information is not disclosed to third parties. In case personal data is being transferred outside EU/EEA, appropriate measures will be taken to ensure protection of the personal data.

8. Personal information dealing platform

The newsletter register is managed by the service provided by Mailchimp/Rocket Science Group. The service provider operates in the U.S. and personal data is transferred outside the EU. Gaia has concluded Standard Contractual Clauses (as approved by European Commission) with the service provider in order to ensure the protection of data transferred to the service provider.

9. Principles for protecting the register

A. Access to register

The access to the newsletter register is protected by user ID and passwords of Gaia's employees.

B. Data to be processed electronically

There is a subscription contract with Mailchimp, and Mailchimp is presumed to seriously follow the privacy policy they have published.

C. Manual material

Any material to be retained manually is exceptional. Every employee with access to the material takes care of the data with precaution and makes sure that the data is not disclosed to third parties. Accordingly, when the data is it is not any more needed it will be erased.

D. Data processing in the operating system

The employees handling personal information are responsible for their own acts and operations according to the agreements and confidentiality obligations they have undertaken.

Employees having access to the operating system will follow Gaia's ICT safety policy when dealing with data. According to the ICT safety policy personal information is not dealt in public places or sites. Electronic data content of the register is not copied unless exceptionally and specifically determined. Electronic copies are stored appropriately and destroyed immediately when they are not needed.

10. Definition of retention period of personal information

Information is gathered continuously from Gaia's customer and marketing register and from other sources. The personal information is deleted from the register, when the person informs a request to be removed from the register.

11. Data subject's rights

11.1. Right to obtain access to the personal information

The data subject shall have the right to require a confirmation about whether his or her personal information is processed or not. If personal information is processed, the data subject has the right

to obtain access to the personal information to acquire all other information written in this statement. The request to obtain the named access shall be done to the contact person of the data controller.

11.2. Right to require the rectification of data

The data subject shall have the right to require the data controller, without any undue delay, to rectify deficient or erroneous piece of information found in the register related to the data subject. Moreover, the data subject has the right to receive an extract of the personal information rectified and completed for example by receiving a supplement from the data controller.

11.3. Right to erase of data ("right to be forgotten")

If the data subject objects the processing of their personal information, the data is removed from the data content. In this case the person shall independently find out the registration or unregistration of an event or occasion informed.

Under the above-named circumstances, the claim of the data subject to be erase their personal shall be submitted in written to the contact person of the data controller.

11.4. Right to restriction of processing

The data subject shall have the right to require the data controller to restrict the processing of their personal data for instance in the following circumstances if:

- a) data subject claims that their personal information is inaccurate. In this case the data processing of the personal data is restricted for a period of time during which the data controller can make sure the accuracy of the data.
- b) processing of data is against law and the data subject objects the erasure of personal data and instead claims restriction of data processing.
- c) data controller does not any more have need of the personal data in the original purpose, but the data subject needs the data to be claimed, presented or defended when lodging a complaint.
- d) data subject has objected the processing of personal information against 21 Art. 1 awaiting the proof to verify if the justification of the data controller overrules the justified grounds of the data subject.

Under this circumstance the claim by the data subject to restrict data processing shall be submitted in written and with justification to the contact person of the data register.

11.5. Right to object to the processing of personal information

The data subject shall have the right, in connection with their personal specific circumstances, to object to processing measures of the data controller at the data subjects' personal information.

The data controller may not extent the data processing unless the data processing can be proved to be based upon the data controller's legitimate ground and that there lies a significant, justified reason which overrules the interests, rights and exemption of the data subject or that the act is necessary for grounds stipulated under a juridical claim or defense.

Under this circumstance the claim by the data subject to restrict data processing shall be submitted in written and with justification to the contact person of the data register.

11.6. Right to data portability

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format, and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided when applicable according to the Art. 20 of GDPR.

12. Right to lodge a complaint with the supervisory authority

Every data subject has right to lodge a complaint with the supervisory authority. In Finland the complaint it to be submitted to the office of the Data protection Ombudsman.

Office of the Data Protection Ombudsman

PO Box 800

00521 Helsinki, Finland

E-mail: tietosuoja@om.fi

Switchboard: +358 (0) 29 56 66700

Fax: +358 (0) 29 56 66735

14. Risks related to the personal information with the data controller

The content of the register is not particularly vulnerable and the register is not subject to significant risks considering current methods of handing registered data as well as the operating model.

As part of the design and development of operations, the idea of built-in security is implemented in the selection of systems and in the planning of the processing of registers.