

# **Privacy Policy - Procemex Customer and Marketing Register**

## **1. Data register name**

Procemex customer and marketing register. The data of the Data controller's customers and prospects and their representatives is processed in the register in ways described below.

## **2. Data content of the register**

The register might include data about the data subject according to the following groups:

- Name
- Email
- Phone number
- Title
- Company and its address
- Commonly available classification data
- Classification data disclosed by the data subject
- Subscription, and delivery data
- Data about subscribed services and changes to them
- Data collected with cookies
- Data collected from social media channels
- Data about the device the data subject is using, such as device type, browser, IP address, and other device data
- Possible other data that has been collected with the data subject's consent

## **3. Purpose and basis for processing personal data**

The Data controller processes personal data for the following purposes:

- To maintain and manage customer relationships
- For customer communications
- In order to fulfill the rights and obligations of the data subject and the Data controller
- For research purposes
- For marketing the Data controller's services
- In order to fulfill the legal obligations of the Data controller

The legal grounds for the Data controller to process personal data according to the EU's General Data Protection Regulation are:

- Data subject's consent
- Performance of a contract
- Data controller's legitimate interest
- Legal requirements

#### **4. Register's regular sources of data**

Personal data is collected from the following sources:

- The data subjects themselves (such as via Procemex's website contact forms or social media services)
- The Data controller's website (newsletter subscriptions, material downloads, event registrations)
- Through the tracking pixels in the Data controller's newsletters
- The data about the data subject that is collected during contract process
- Data collected from customer meetings
- Data subject's service usage
- Data controller's customer data register
- Other possible situations where the data subject discloses their data to the Data controller
- Data from public sources, such as company websites, trade register, Leadfeeder or social media channels (such as LinkedIn)
- Through cookies and other equivalent technology

In addition, the Data controller utilizes Google Ads, PiwikPro, Leadfeeder, LinkedIn, Youtube services to collect website visitor data in order to analyze and improve the website and target the visitors with relevant marketing.

#### **5. Regular data disclosure**

As a rule, the Data controller does not disclose data subjects' personal data to third parties. Data can be disclosed when the authorities require, in order to meet contractual obligations or to the extent that has been agreed with the data subject. In some cases, the personal data of data subjects might be disclosed to subcontractors or affiliates of the Data controller. These organizations process the data confidentially and based on a separate written agreement according to the written instructions from the Data controller.

The Data controller can disclose statistical or anonymized data that cannot be connected to the data subject.

#### **6. Transferring data outside the EU or EEA**

We store your personal data in selected and secure data centers located in Europe.

#### **7. Data storing time**

Personal data is only stored for the period of time that is necessary based on the grounds for data processing and the purposes defined in this Privacy Policy, or for the period of time required by law, such as the Accounting Act. The data controller assesses the necessity of storing data on a regular basis according to internal practices.

#### **8. Data subject rights**

The data subject has the following rights. Requests to exercise these rights should be directed to the address in item 2. The data controller might ask the person making the request to prove their

identity. The Data controller will provide the requested data within the timeframe provided in the EU's General Data Protection Regulation.

### **The right to access your own data**

The data subject has, at any given time, the right to check the data that has been collected of him or her.

### **The right to rectify data and the right for erasure (the right to be forgotten)**

By the data subject's request, the Data controller rectifies, erases or complements faulty, insufficient, unnecessary or outdated personal data to the extent that is necessary for the processing of data. The Data controller can also rectify, erase or complement data from their own initiative.

### **The right to withdraw consent**

With regard to personal data collected on the basis of consent, the data subject has the right to withdraw the consent they have previously given for processing their personal data.

### **The right to data portability**

The data subject has the right to transfer the data they have provided to another data controller when the processing is based on consent or a contract and when it is technically possible. The Data controller will in these cases transfer the data in a structured, commonly used and machine-readable format. The Data controller is not responsible for the compatibility of the data format with the recipient's system.

### **The right to restrict processing and the right to object**

If the Data controller processes personal data based on the grounds of public interest or legitimate interest, the data subject has the right to object to the processing of their personal data to the extent that there are no significant grounds for processing the data that would override the rights of the data subject or the processing of data is not necessary to settle a legal claim.

The data subject has the right to prohibit direct marketing including profiling analyses conducted for the purposes of direct marketing. Each direct email marketing message sent by the Data controller has a link that allows the data subject to prohibit direct messaging to their email.

The data subject has the right to restrict the processing of their personal data if the data is faulty, the processing is illegal or the data is no longer necessary.

### **The right to appeal**

The data subject always has the right to appeal to the relevant supervisory authority or to the supervisory authority of the EU member state where the data subject is living or working if the data subject considers that the Data controller has not processed personal data in accordance with the applicable data protection laws.

## **9. Register security principles**

Personal data is stored as confidential material. The Data controller's data network and hardware where the register is located are protected by a firewall and other necessary technical measures. The Data controller ensures that the stored information, as well as server access and other information critical to the security of personal data, is treated confidentially and only by the employees whose job description it is included in.

## **10. Cookies**

The Data controller utilizes cookies on its website to improve user experience and to carry out targeted advertising. Cookies are small text files that are sent as a request by the browser to the user's computer and stored there.

The cookies used by the Data controller are related to targeting advertising and social media channels used by the Data controller (including Google Ads, LinkedIn, YouTube,) analyzing and monitoring website visitor data (Leadfeeder). These software save data about, for example, what pages a person visits, how long a person stays on a website, how a person ended up on a site and which links a person clicks.

Softwares collecting the cookies on our site are Google Ads, PiwikPro Analytics, LinkedIn, Leadfeeder and Youtube.

You can read the details about the use of cookies and disable cookies in the site's cookie management.

## **11. Changing the Privacy Policy**

This Privacy Policy has been updated 16.8.2023.

The Data controller reserves the right to change this privacy policy by notifying changes on this page.

## 12. Contact information

### **Data controller:**

Procemex Oy Ltd ("Data controller")

Appiukontie 10  
40530 Jyväskylä

Finland

Phone: +358 14 3372 111

If you have any questions about Procemex Ltd's privacy statement, the processing of your personal data, or you want to use your rights based on data protection legislation, you can contact us by email [info@procemex.com](mailto:info@procemex.com)