

Kemppi Group – Data Processing Notice for Customers

Kemppi Group Oy (“Kemppi”) acts as a data controller for customers’ persons (“Persons”) whose personal data is used or collected for giving access rights to Kemppi Group Oy’s, Kempower Oy’s or Kemppi Oy Group’s information systems. For the sake of clarity, the persons shall note, that Kemppi acts as a data controller only in the circumstances and for the data defined in this Notice.

This Notice sets out the types of personal data that we collect and process of customers’ persons (current customers and new leads).

1 Data controller

Kemppi Group Oy
2051826-1
Kempinkatu 1
15810 Lahti

2 Contact details for personal data protection

Data controller’s contact person: Sanna Sinkkonen
Company: Kemppi Oy
Address: Kempinkatu 1, 15810 Lahti, Finland
Email and phone number: sanna.sinkkonen@kemppi.com; +358 89 911

Data protection officer: Tomi Moberg
Company: Kemppi Group Oy
Address: Kempinkatu 1, 15810 Lahti, Finland
Email and phone number: tomi.moberg@kemppi.com; +358 3 89 911

3 The purposes of the processing of personal data and the legal basis for the processing

Persons personal data is processed for fulfilling data controller’s legitimate interest. The legal basis for processing personal data is to fulfilling the requirements for working in line with customer agreement.

Personal data is collected in particular for the following purposes:

- handling offers, orders, deliveries and invoices
- giving access rights to Kemppi’s digital services
- communications with the person (incl. marketing activities like newsletters)

In order to fulfill the above listed tasks, it is necessary to collect and process personal data.

4 Categories of personal data

For the purposes as set out in section 3, we process the following personal data or categories of personal data related to persons

- Person's basic data such as name, title, phone number, address and e-mail address
- Person's training history
- Person's areas of interest in Kemppi website (see [Privacy policy](#) and [cookies](#))

5 Data Sources

Customer's personal data is collected directly from the person or his/her employer. Data is collected in the following manner:

- Provided by the person directly via e-mail, at exhibitions, by phone or directly into an ICT application
- Provided via customers contact by e-mail, at exhibitions, by phone
- Provided by the person and saved to Kemppis digital services
- Automatically (cookies) when visiting Kemppi web pages

6 Personal data retention

Personal data relating to persons are retained as long as customer relationship is valid and it is necessary for the purposes for which they are processed, as set out in section 3.

7 Data recipient

Kemppi Group employees, who are committed to confidentiality, may process personal data in accordance with EU data protection legislation. The data controller shall ensure that only persons authorised to process and persons for whom the processing of personal data is strictly necessary in order to carry out their tasks, will have access to personal data relating to the persons. Other employees of the data controller shall not have access to personal data relating to persons.

The processing of personal data is also partly outsourced to service providers, which act as data processors according to applicable EU data protection legislation. The data controller ensures, by way of binding contractual arrangements, that where the processing of personal data is to be carried out by a service provider, such service provider shall implement appropriate technical and organisational measures in such manner that the processing will meet the requirements of EU data protection legislation and ensures the protection of the rights of the persons.

Kemppi Group will not share, sell or otherwise disclose personal data relating to persons for purposes other than those outlined in this Notice. Examples of instances where personal data relating to persons may be shared or disclosed include:

- Compliance with laws – where it is necessary or required by law, in order to comply with legal process or government requests (including public authorities law enforcement requirements);

8 International data transfers

Data is not transferred outside European Union or EEA regions.

Persons name and email address can be transferred to service maintained by single service provider outside European Union or EEA region. In these cases such as the United States Privacy Shield approved by the European Commission guarantees rights to EU citizens.

9 Automatic decision making and profiling

We collect into our CRM system information of user's areas of interest based his/her activities in our website and we may use this information in direct marketing communication (see [Privacy policy](#) and [cookies](#)).

10 Rights of the data subjects

Under the applicable EU data protection legislation, persons have the following rights as data subjects:

Right to request access to personal data

Persons shall have the right to request access to the personal data processed of him or her by receiving a copy of the personal data undergoing processing.

In addition, person may issue a request to access personal data concerning him or her by sending an email to gdpr@kemppi.com.

Right to rectification and restriction

Data controller shall ensure to the best of its ability that personal data concerning persons stay accurate and up to date. Data controller will rectify, delete, or complete personal data that is unnecessary, inaccurate or outdated on its own initiative or as requested by the person or made by person himself/herself. Person shall, nonetheless, be liable for ensuring that the personal data provided by him or her is accurate and up to date. Persons shall, furthermore, be liable for notifying changes to the personal data provided by him or her.

Persons shall have the right to restrict the processing of his or her personal data where the accuracy of the personal data is contested by the person, for a period enabling the data controller to verify the accuracy of the contested personal data in question.

To rectify person's own personal data, persons are encouraged to take contact to the contact persons set out in section 2 of this Notice.

Right to object and erasure

Persons shall have the right to object the processing of personal data and request for erasing the data concerning him or her only where the processing of personal data has been unlawful.

Right to data portability

Personal data handling is based on justified benefit so person has no right to require transmit personal data to other system.

Right to lodge a complaint to a supervisory authority

Persons shall have the right to lodge a complaint to a supervisory authority where his or her rights have been violated according to applicable EU data protection legislation. You can contact your state or national data protection authority in the jurisdiction where you work. The list of national data protection authorities within the EU and the EEA: http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080

11 Principles for protecting personal data

Personal data, relating to persons, that appears in manual or paper form is always stored in locked premises and access to such premises is granted only to persons for whom the access is strictly necessary in order to carry out their tasks. Personal data, relating to persons, in digital form is stored in databases, which are secured with technical measures, such as firewalls and passwords. Databases are in locked premises and access to such premises is granted only to persons for whom the access is strictly necessary in order to carry out their tasks. Furthermore, employees of Kemppi Group as well as employees of service providers, that process personal data relating to persons, have committed to confidentiality. The processing of personal data according to this Notice is also monitored by way of log file management.

12 Changes to this Notice

Kemppi Group or Kemppi Group company, acting as a data controller, may make changes to this Notice. Latest version of Notice is available by request from Data Controller's Contact Person or will be provided when sending a request GDPR@kemppi.com to receive the latest version.