

## **Numpac Privacy Notice for the business customer and suppliers**

### **1 Controller**

Suomen Numerot Numpac Oy (Numpac), business id 1829232-0  
Opastinsilta 12 G, 00520 Helsinki

### **2 Contact person in privacy questions**

Seppo Backman  
e-mail: seppo.backman@numpac.fi

### **3 Legal basis for and purpose of the processing of personal data**

The legal basis of processing personal data is our legitimate interest based on customer relationship and/or other relevant connection, to perform a contract between Numpac and business customer, supplier or other business partner.

Personal data are processed for following purposes:

- creation, management and development of customer and supplier relationship
- delivery of products and services
- marketing and sales of products and services
- communication with the business customer and supplier, including customer and supplier feedback and satisfaction surveys, information of possible incidents
- development of products, services and businesses
- detection, prevention and investigation of fraud and other criminal offences

### **4 Data subjects and categories of personal data**

The data register includes personal data of the contact persons of its prospective, current, and former business customers, suppliers and business partners. Following categories of personal data are processed for the purposes described above:

- name, title, the company, postal address, e-mail address, phone number
- user names
- information about the service use, such as browsing information, cookies, IP address
- feedback and contact requests
- other personal data provided by the data subject

## **5 Regular sources of information**

Personal data are collected directly from the data subject when the data subject is using a web site or other service, sending request for contact or information or filling in a form; purchasing or ordering, contracting or otherwise interacting with Numpac personally.

## **6 Disclosure and transfer of data**

Data will not be disclosed to external parties except when it is necessary to comply with the legal or contractual obligations of Numpac.

Numpac outsources some functions of the service to third party vendors or other sub-contractors, such as ICT service provider. In such case Numpac will transfer personal data to these sub-contractors to the extent necessary for the provision of their services. These sub-contractors will process personal data on behalf of Numpac and must comply with Numpac's instructions and this privacy notice. Numpac will ensure through contractual measures that the personal data is processed in compliance with the legislation.

Personal data will not be transferred outside the European Union or the European Economic Area.

## **7 Data protection and retention**

Access to personal data will be permitted only to persons who need to process data as a part of their employment or other duties. Digital data is protected by firewalls, passwords and other technical means. All data is kept in locked premises secured with physical access control.

Personal data will be retained as long as it is necessary for the purposes, taking into account the applicable legislation. Personal data will be deleted two years after the relationship between Numpac and the business company, supplier or other business partner has ended (taking into account the applicable legislation).

## **8 Rights of the data subject**

Data subject is entitled to prohibit the use of the data for direct advertising, telemarketing and other forms of direct marketing, as well as to prohibit the use of the data for use in questionnaires and market research.

Data subject has the right to know what kind of personal data has been collected and processed. Upon the data subject's request, we will rectify, remove or supplement any incorrect, unnecessary, incomplete or outdated personal data. The requests can be submitted to contact persons defined in section 2 above.

Data subjects may also object to or restrict processing of their data in cases defined by law, and the right to complain to the supervisory authority.