

# Privacy notice

Reliable Partner service

(Last updated on 18 November 2019)

## 1. Controller and contact person of the register

Vastuu Group Oy (Business ID 2327327-1)  
Tarvonsalmenkatu 17 B  
02600 Espoo, Finland

Data Protection Officer's contact details:

Email            dpo@vastuugroup.fi

Regular mail    Vastuu Group Oy  
                     Data Protection Officer  
                     Tarvonsalmenkatu 17 B  
                     02600 Espoo, Finland

## 2. Data subjects

Data subjects are legal representatives, officers or directors of a customer company that has subscribed to the Reliable Partner Service provided by Vastuu Group Oy (the "Supplier"). Data subject's personal data and position in the customer company has been registered in the national trade or company register and is shown on the trade register extract.

## 3. Basis for and purpose of personal data processing

The legal basis for personal data processing is the legitimate interests of the controller.

The Reliable Partner service allows Supplier's customer to offer its partners, in an electronic format, information that they need to fulfil their clarification obligation imposed on contractors in the Act on the Contractor's Obligations and Liability when Work is Contracted Out (1233/2006). The contractor's liability data of customers who have subscribed to the Reliable Partner service is available to third parties in Supplier's Valvoja, Raportti Pro, Raportti and Zeckit services and in the business information services provided by Supplier's partners.

## 4. Which personal data is collected and from what sources?

The following personal data will be collected in the Reliable Partner service register of the customer company's responsible persons:

- name
- date of birth
- nationality
- hometown
- position of responsibility in the company and its start and end dates
- bans on engaging in business activities, if any

Data is acquired either directly from the respective trade register or business prohibition register or through a commercial business information service, and is integrated into the Reliable Partner report prepared by the Supplier.

We collect the following information on the signatory of the Reliable Partner service contract when the contract is signed:

- name
- position in the company
- unique identification of the person (identity number) that allows for checking the reported position against the trade register data
- signature date

#### 5. Regular disclosure and transfer of personal data

The Reliable Partner report and related personal data is available to third parties in Supplier's Valvoja, Raportti Pro, Raportti and Zeckit services and in the business information services provided by Supplier's partners. Reliable Partner reports can be provided in an electronic format through an interface to the bidding, procurement, or similar data systems of our customers.

We can disclose data contained in the Reliable Partner register to the authorities based on the mandatory requirement of a competent authority, or when we consider the inquiry of the authority to be justified in order to investigate suspected misuse of our services.

In the production of the Reliable Partner service, we can use subcontractors located within the European Economic Area, and it can also transfer personal data to such subcontractors for producing the service.

#### 6. Transfers outside the EU and EEA

As a rule, personal data is not transferred outside the EU or the European Economic Area.

#### 7. Storage period of personal data

We archive all Reliable Partner reports created and uses the archived reports for providing customer services and for ensuring the reliability of the service and the authenticity of the reports created.

Only the latest Reliable Partner report is kept available for third parties on Vastuu Group's report services at all times.

#### 8. Rights of data subjects

As a data subject, you have the right to inspect the personal data concerning yourself and demand that any incorrect data be corrected or deleted. However, we can, within the limits of law, restrict your right to access data that contains the personal data of others, is a business secret of ours or our customer, or is related to the safety features of the service.

You have the right to request that your personal data be deleted in situations specified in the general data protection regulation, if:

- you cancel your previous consent and there is no other legal basis for processing the data concerned besides your consent
- you object to the processing of your personal data, and there is no legal basis for continuing the processing
- processing the data is illegal
- you are under 18 and your personal data was collected in connection with providing information society services.

In situations specified in the general data protection regulation, you have the right to object to the processing of your data or to request that the processing of your data is restricted. If you consider the processing of your personal data to be illegal, you can submit a complaint on the processing to a competent authority.

#### 9. Data security

The right to use the register is restricted to appointed persons only, who need the information concerned in their work tasks. Each user has his/her own user name and password. Personal data is stored in databases and data systems located within the European Economic Area that have the appropriate technical and organisational measures in place to protect the personal data against misuse and disclosure.

#### 10. Contacts

If you have questions regarding this privacy notice or you wish to exercise your rights, please contact Supplier's Data Protection Officer by using the above email or postal address.

#### 11. Changes

We can make changes to this privacy notice from time to time without a separate notice. Any changes made are listed in the "last update" section at the beginning of this privacy notice.