



# VALMENNUSMAJAKKA'S PRIVACY POLICY

## DATA CONTROLLER

Finn Connection Trade House Oy (Valmennusmajakka)  
Saukkopolku 5  
39200 Kyröskoski  
Business ID 1486317-3  
Tel. 050 555 3351  
tiedustelut@valmennusmajakka.fi

## CONTACT PERSON

Jaana Ollilainen  
Managing Director  
Valmennusmajakka  
Tel. 050 555 3351  
jaana.ollilainen@valmennusmajakka.fi

## BASIS FOR HOLDING A REGISTER

The basis for processing the personal data of applicants and participants of training programmes and online training purchasers is a customer account. In the case of instructors, IT support and administrative support measures, the basis is a business relationship, and in the case of staff, the basis is employment.

We collect visitor data on our website using the Google Analytics service. In addition to this, we collect data for Facebook and Google AdWords marketing. This data is only available to Valmennusmajakka. The said data allows us to provide our services to individuals who have visited our website.

## PERSONAL DATA PROCESSORS AND DISCLOSURE

Personal data is received and processed by Valmennusmajakka's staff and the instructors who operate as subcontractors. The administration of the information system (Tulosmajakka), which is used for storing and processing personal data, is the responsibility of Valmennusmajakka's IT support provider, which in this role may process personal data.

We ensure that your data's confidentiality is maintained and that the data is processed in a legally appropriate manner by means of agreements. In order to fulfil contractual obligations, or if required by law or a competent authority, we may disclose data. We may also disclose your data if we are a part of a business acquisition.

Valmennusmajakka shall not disclose the personal data of data subjects outside the EU.

## PARTNERS

Valmennusmajakka requires all its partners and subcontractors to implement protection and processing practices that meet at least the level of this privacy policy. Subcontractors and partners must also commit to the guidelines concerning the retention and processing of personal data that have been separately delivered by Valmennusmajakka. Cooperation agreements concluded with subcontractors and partners include a confidentiality clause.

Valmennusmajakka operates as the processor of personal data for organisations ordering training programmes and commits to the customer organisations' personal data processing processes.



## **INTENDED DATA USE**

The data of training programme applicants is used in the application process. The data of training programme participants is used for participant guidance purposes and training-related administration.

Electronic direct marketing includes email, SMS, speech, audio and graphic messages. If customers wish, they can provide necessary consent to marketing when registering to Tulosmajakka. Data for marketing purposes shall not be disclosed outside Valmennusmajakka.

We do not use data for automatic decision-making or profiling.

## **INFORMATION SYSTEMS AND DETAILS TO BE SAVED**

### **TULOSMAJAKKA**

Tulosmajakka operates as a learning environment for participants of business training programmes, and as a training management tool. IT support is responsible for administration and development together with the staff of Valmennusmajakka.

### **GOOGLE CLOUD SERVICES**

Training administration data is processed in Valmennusmajakka's cloud services.

### **Data subjects, saved data and retention period**

#### Training applicants

Name and contact details as well as business idea. The training programme client provides the information. The data is retained for the duration of the training.

#### Training participants

Name and contact details, date of birth and/or social security number, and details concerning participation in the training programme (participant's personally completed mapping of skills, and business-related plans and calculations). The information is provided by the training programme client, the customer themselves and the instructors.

The participants have the opportunity to print and update their business plan for 24 months following the end of the training programme. The data is retained for ten years after the end of the training programme.

### **Technical security of Tulosmajakka**

Users log into the system using a password, and the email address they have personally registered. The user details are stored in a database, which is password-protected and secured with a firewall.

A backup copy of the system is saved to the server every week. A disc image of the server is made monthly, and it is retained for two months. The server is located in Finland.

### **Tulosmajakka's user monitoring and user data restrictions**

Tulosmajakka implements various user levels, which restrict the rights associated with the user ID. The ID holder only has access to the personal details required by such individuals to complete their tasks.

## **HIDDEN DATA**

Forms and agreements that contain personal data and are associated with business administration and reporting are primarily retained in electronic format. Paper forms are



processed and stored with particular meticulousness. When a document is no longer needed, it is destroyed without delay.

### **USE OF COOKIES**

We use cookies on our website. Cookies provide us with information about how users use our website. We may utilise cookies for the development of our services and website, analysing the use of our website and targeting and optimising marketing. Website users can provide consent or refuse the use of cookies in their browser settings. Most browsers automatically accept cookies. Please note that preventing the use of cookies may limit the functionality of our website.

### **GENERAL SECURITY PRACTICES**

Documents containing personal data are received and sent as secured emails.

Personal data is not saved on memory sticks or any other external data storage devices.

Data storage devices that include data concerning Valmennusmajakka's operations are always password-protected.

### **RISK MANAGEMENT**

The company's data protection practices are regularly developed and reviewed. Development needs are documented, and their implementation is monitored at reviews that are organised twice a year.

### **UPDATING THE PRIVACY POLICY**

We may update the privacy policy if our operations or data protection principles change. Updates may also be topical if legislation changes. Changes shall enter into force when we have published an updated privacy policy. The most current privacy policy can be found on our website. Therefore, we kindly ask you to familiarise yourself with the content of the privacy policy regularly.

### **RIGHT TO REVIEW AND RECTIFY DATA**

You are entitled to exercise the rights described below by contacting us by email at [tiedustelut@valmennusmajakka.fi](mailto:tiedustelut@valmennusmajakka.fi). Please indicate your name, address and phone number. Please also attach a copy of your passport, driving license or another form of ID so that we can confirm your identity.

### **Cancelling consent**

If the data subject's personal data processing is only based on consent, and not, e.g. a customer account or membership, the data subject can cancel their consent.

### **Access to data**

You are entitled to request us for confirmation on whether we process any personal data about you and what personal data about you we process. In addition to this, you have the right to obtain supplementary information about the basis for processing your personal data.

### **Right to review**

The data subject may review the personal data we store about them.

### **Right to rectify errors**

The data subject may request for any incorrect or incomplete details about them to be rectified.

**Right to refuse processing**

The data subject may refuse the processing of their personal data if they deem that their personal data has been processed in violation of legislation.

**Right to refuse direct marketing**

The data subject has the right to refuse the use of their details for direct marketing purposes.

**Right to remove**

The data subject has the right to request their data to be removed if the processing of such data is unnecessary. We shall process your request, after which we will either delete your details or provide you with a justified reason for not being able to delete the data. Please note that the data controller may have legal or other rights not to remove the requested data. The data controller has an obligation to retain accounting material in accordance with the period of time (10 years) referred to in the Accounting Act (Chapter 2, Section 10). For this reason, material concerning accounting cannot be removed before the expiration of the relevant period.

**Right to have data transferred**

Suppose we have processed your data on the basis of your consent or to fulfil an agreement. In that case, you have the right to obtain the information you have electronically provided us in a generally used format so that your data can be transferred to another service provider.