

**DNWP Privacy Policy  
Marketing register  
23.05.2018**

**1. Controller of the register**

Dedicated Network Partners Oy  
Karakari 5  
FI-02610 Espoo

**2. Contact information about the register**

privacy@dnwpartners.com

**3. Register name**

Marketing register

**4. Purpose of collection of personal data**

Products, services and events marketing

**5. Register information content**

- Name
- Company name
- Title
- Business e-mail
- Business addresses
- Phone number

**6. Data retention time**

Personal data is stored as long as the information is needed to fulfill, maintain and develop customer/partner/supplier relationships. The data is reviewed within the occurrence of every marketing activity.

**7. Regular sources of information**

The information in the marketing register is collected within the customer relationship.

## **8. Regular transfers and handing over of information and transfer of information outside the European Union (EU) and the European Economic Area (EEA)**

The gathered information is used for informing customers/partners/suppliers about our products and services. Personal data is shared if we have legitimate interest (e.g. contractual rights) or customer consent to do so. In some cases, it is obligated by mandatory law to disclose personal data to certain authorities or other third parties, for example, to law enforcement agencies in the countries where Dedicated Network Partners Oy, or third parties acting on our behalf, operate.

The information in the register is maintained and processed mainly in Finland with some later defined exceptions.

Our marketing services are partially located outside of EU and EEA, e.g. in the United States operated by MailChimp. MailChimp belongs to [the EU-US privacy shield framework](#).

MailChimp maintains online platforms that allow us to keep in contact with our customers, partners and suppliers, primarily by sending emails. We allow users to upload their personal information directly into our database. This information is used to send promotional emails and enable the use of certain other MailChimp marketing features on behalf of these users.

## **9. Register data protection principles**

Personal data is protected against unauthorized access or accidental data processing. The electronic data is protected by a firewall, usernames and passwords. Data transfers are protected by encryption. Possible paper copies are stored in a locked cabinet. Only personnel specifically authorized to handle personal data are authorized to access it.

In cases where the personal data is handled outside of the EEA, it's ensured that there is a legal basis for such a transfer and that adequate protection for personal data is provided as required by applicable law, for example, by using standard contractual safeguards approved by relevant authorities as indicated in Chapter 8.

## **10. Automated decision-making**

Automated individual decision-making, like profiling, is not used.

## **11. Registered rights**

According the EU GDPR regulation the registered has the right to inspect what personal information relating to him/her has been deposited in the register.

These requests related to this register can be issued to: [privacy@dnwpartners.com](mailto:privacy@dnwpartners.com)

The right of inspection is free of charge at most once a year.

Additionally, the registered has the following rights:

- Right to claim rectification or removal of incorrect or obsolete personal data (Articles 16 and 17)
- Right to claim transfer of personal data from one system to another (Article 20)
- Right to limit the processing of his / her personal data (Article 18)

One important right is that the registered has right to object to the processing of his/her personal data (Article 21). This means that the controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the registered or for the establishment, exercise or defense of legal claims.

For example, if personal data is processed for direct marketing purposes, the registered has the right at any time to object to processing of personal data relating to such marketing.

The registered has also the right to withdraw his/her prior consent to the processing of data (Article 7) or to file complaints with the supervisory authority on the processing of his/her personal data (Article 77).

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DNWP is constantly developing its business and therefore reserves the right to change this privacy policy. The information may be subject to changes from time to time due to i.e. technical reasons and/or changes in our service providers, applicable legislation and legal interpretations.