

**DNWP Privacy Policy**  
**Order management and customer relationship 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**

Order management and customer relationship register

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

Customer and reseller purchase, delivery and relationship management

Supplier order and relationship management

**5. Register information content**

- Name
- 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/supplier relationships. If there has been no deliveries or purchases in 10 years, then such personal data will be removed from the register. Purchasing and procurement related documents are retained for 10 years from the end of the accounting year.

**7. Regular sources of information**

Customer contact information is gathered during regular commercial procedures (offering, order confirmation, invoicing and purchasing). Supplier contact information may be searched as per need from suppliers' web pages, emails, phone discussions or received invoices.

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

Gathered information is used for delivering ordered products and services to customers or to order needed products and services from suppliers.

Personal data is shared if we have legitimate interest (e.g. contractual rights) or customer consent to do so. Personal data is shared with authorized third parties, for example in cases of:

- Delivery of ordered purchases
- Providing services
- Billing
- Managing customer data

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.

Due to the international sales organization, some of the outside of the EU coming orders are processed outside of the EEA, e.g. in Thailand.

### **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.

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

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

### **11. Registered rights**

According to 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 the 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.