

DNWP Privacy Policy Support web user register 23.05.2018

1. Controller of the register

Dedicated Network Partners Oy Karakaari 5 FI-02610 Espoo

2. Contact information about the register

privacy@dnwpartners.com

3. Register name

Support web user register

4. Purpose of collection of personal data

Support web user management

5. Register information content

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

6. Data retention time

Personal data is stored as long as they are needed to fulfill, maintain and develop customer/partner/supplier relationships. The register data is inventoried annually and users who have not logged in to the service during the year will be sent a query about the need for permissions. If no response to the questionnaire is received during one month, the user's rights to the service will be canceled and personal data will be deleted from the register.

7. Regular sources of information

Contact information is gathered from users themselves, via the support web access rights application form.



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 arranging file delivery services to customers and to maintain customer data. 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 in Finland.

The information is not transferred outside of the EU and the EEA.

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.

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

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

Additionally, the registered have the followed 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).

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.