

## Description of File of the Personal Data File

(Personal Data Act 523/99 §10)

Drawn up on 20.12.2005

### Controller

Name:	Suomen Asiakastieto Oy Reg.No. 161689 Business ID: 01110279
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### Person in charge of the matters regarding the files

Teija Rantanen

### Additional information and requests for rectification

Suomen Asiakastieto Oy  
Consumer service

### Line of business of the controller

The company is engaged as its line of business in professional credit data activities and marketing database activities.

### File to be used in the activity

The file on decision-makers, maintained by Suomen Asiakastieto Oy, containing personal data on decision-makers of companies and corporations to be used for marketing purposes. (Personal Data Act 523/99, section 19 paragraph 3.) In this connection, decision-makers refer to persons who, on the basis of their position make decisions pertaining to their work duties on behalf of the employer.

Also data on persons in charge of companies (persons with business involvement) are processed in the file on decision-makers, the data being obtained from the Trade Register. Suomen Asiakastieto Oy has prepared a separate description of file on the processing of data on companies' persons in charge in other purposes.

### Purpose of the processing of personal data

Personal data is processed for the purpose of offering relevant data for marketing or sales activities, or for opinion polls or marketing research (Personal Data Act 523/99, section 19 paragraph 3), and for updating customer files. Data shall be disclosed in this purpose.

The controller also uses the file for realising the notification and access rights (Personal Data Act, section 26).

### **Description of the group of data subjects and the data groups in the file**

The file contains information concerning the data subject's work duties, or position in business or in a public duty, and it will be used for sending information relating to his work duties.

The file also contains other data the controller considers necessary for the use of the purpose of the file (e.g. age, sex).

The file contains marketing prohibition and e-mail prohibition data for the persons who have requested this.

The data to be recorded is based on the section 19, paragraph 3 of the Personal Data Act.

The data subjects themselves do not have a customer relationship with Suomen Asiakastieto Oy.

### **Disclosure of data**

Data from the file shall be disclosed to those who need the data for sending to the data subject information pertaining to his work duty. The data may also be used for opinion poll or marketing research, and for updating customer files.

The conditions for the use of the data shall be agreed upon in customer contracts and terms of use.

The data shall be disclosed through the browser (Internet) and as electronic files.

The parties using the data shall be obligated to reveal the address source in their transmissions with addresses.

### **Description of the principles of file protection**

The file shall be kept in the premises of the controller, provided with appropriate protection and access control systems.

The prevention of misuse and invasion attempts is carried out by using technical and application solutions of different levels.

Separate control software is used in the control of customer connections. In browser-based services, the SSL encryption is used. In the application interfaces based on the use of a subroutine library, the data communications are encrypted by a strong encryption, based on the method of public and secret keys and changed for every transaction. The clients are identified by user IDs and passwords that are personal in the online services.

The data warehouses are backed up daily.

### **Control of use**

The users have personal user IDs and passwords, on the basis of which the users are identified. Data is also disclosed through open browser services, in which case the telephone number or bank connection of the user will be saved.

The persons employed by the controller have signed an obligation to observe secrecy.

User authorities of different levels have been defined for the personnel. The personnel has been familiarised with the legislation.

### **Rights of the data subject**

The data subjects shall be informed of the processing of data according to the Personal Data Act. When using the right of access according to the law, the data subject has to prove his/her identity either in connection with a personal visit or by enclosing a copy of the official identity card to the written request.

The controller shall, on its own initiative or at the justified request of the data subject, erase, rectify or supplement erroneous, unnecessary, incomplete or obsolete data contained in its data file without undue delay. Essential in the rectification, supplementing or erasing is the purpose of use of data, i.e. the transmission of information relating to the work duty.

The data subject may forbid the disclosure of data for direct marketing and to forbid the disclosure of data for a contact to be made by e-mail.

### **Transfer of personal data outside the European Union or the European Economic Area**

Data shall not be disclosed outside the European Union or the European Economic Area without the express consent of the data subject.

### **Data sources**

Data subjects: work duties, contact data, age, and sex  
Employers of the data subjects: work duties, contact data, age, and sex  
Press and other public sources (appointment news)  
Information generally available (e.g. publications, databases, Internet)  
The Trade Register

Telephone conversations conducted with the data subject, the employers of the data subjects, and the representatives of the employers may be tape-recorded. The recording shall be destroyed immediately after the data collected in this way has been saved.