Privacy notice for data subjects who are decision makers in a company, own company, are in charge of a company or are beneficial owners

1. **Controller:**

Suomen Asiakastieto Oy, Elielinaukio 5 B, PL 16,00100 Helsinki, www.asiakastieto.fi, www.omatieto.fi, www.proff.fi

Suomen Asiakastieto Oy is part of **Enento Group Plc**, Elielinaukio 5 B, PL 16, 00100 Helsinki www.enento.com

2. **Personal data which is processed**

- **Decision makers**
  - Your name
  - Email address and phone number connected to your role
  - Information on your role and title in the company
  - Information on the prohibition to use your personal data for marketing purposes
- **Owners**
  - Your name
  - Your ID number or your birthday
  - Your nationality
  - Information on your ownership of the company
- **People in charge of a company**
  - Your name
  - Your domicile
  - Your ID number
  - Your nationality
  - Information on your role in the company
  - Start and end date of this role
  - Information on companies you are or have been in charge of
  - Information on your possible business ID (sole traders)
  - If you have a personal payment default entry recorded, this will be processed as personal credit information. For more information please see the “Privacy notice for data subjects that have payment default entry”
  - Information on you being allowed to verify ESG-data reported on behalf of the company
- **Beneficial owners**
  - Same personal data as above under “Owners” and “People in charge of company”

We also process call recordings of the recorded phone calls we have with you.

When you visit our website we will collect e.g.

- data about how you use our website
- technical data concerning your browser and your IP address

3. **Purposes for processing your personal data**

- **Decision makers**
    - Asiakastieto processes your personal data to provide it to companies processing them for marketing purposes, for polls and for updating customer databases.
- **Owners**
    - Asiakastieto processes your personal data to provide information about the owners of the company to business customers. Customers need this information to be able to comply with the requirements of the Act on Preventing Money Laundering and Terrorist Financing.
- **People in charge of a company**
    - Asiakastieto processes data for business purposes and provides services concerning lending and other financial decision making, this includes processing personal data.
    - Asiakastieto processes your personal data, so you are able to verify ESG-data reported on behalf of your company.
    - Personal data concerning you will be processed and provided to customers along with the information concerning the company.
    - Personal credit information will also be processed to assess your financial position and ability to manage your financial commitments, please see “Privacy notice for data subjects that have a payment default entry”.
    - Personal data concerning data subjects in charge of a company will be processed according to Credit Information Act when rating companies.
- **Beneficial owners**
    - Asiakastieto processes data for business purposes and provides services concerning lending and other financial decision making, this includes processing personal data.
    - Asiakastieto deduces the beneficial owners based on company owner data and data concerning people in charge of companies collected from Finnish Patent and Registration Office.

Asiakastieto processes your personal data to send you possible customer feedback survey after you´ve contacted us.

4. **Legal basis for processing your personal data**

- **Decision makers**
    - We process your personal data based on GDPR 6.1 f and the legitimate interest of Asiakastieto and our customers.
- **Owners**

    - We process your personal data based on GDPR 6.1 e and section 21 of Credit Information Act.
- **People in charge of a company**
    - We process your personal data based on GDPR 6.1 e
    - We process personal data as provided in section 12 of Credit Information Act and this provides legal basis for the processing of personal data in situations meant in GDPR 6.1 e.
- **Beneficial owners**
    - We process your personal data based on GDPR 6.1 e and section 4 of Data Protection Act.
    - We process personal data as provided in section 12 and 21 of Credit Information Act and these provide legal basis for the processing of personal data in situations meant in GDPR 6.1 e.

We also process your personal data to send you possible customer feedback survey based on GDPR article 6.1 f and legitimate interest of Asiakastieto.

5. Special categories of personal data and personal data relating to criminal convictions and offences

We don´t process sensitive category personal data or data relating to criminal convictions and offences concerning you.

6. Collection of your personal data

We collect personal data concerning you from third parties which are

- **Decision makers**
    - Data subjects: Information about the role, contact information
    - Employer of the data subjects: Information about the role, contact information
    - Suomen Asiakastieto Oy Contact database: Phone numbers
    - Press and other public sources: Information about appointments
    - Publicly available sources: e.g. databases, internet
- **Owners**
    - Owner registers of the company: Information about ownership
    - Trade register: Information about ownership when company is established
- **People in charge of a company**
    - Companies: Information about shareholders, board members, CEO, owners
    - Trade register: Information about business interests
- **Beneficial owners**
    - Companies: Information about ownership, information about shareholders, board members, CEO, owners

    - Trade register: Information about ownership from the time when company is established, information about business interests

We collect your personal data from you when you contact us or register to use a service. You can give your contact details to us by filling in a form on our website, buying a service or contacting us by calling or by using chat on the website.

7. Third parties that we disclose your personal data to inside EU/EEA

- **Decision makers**
    - We disclose your personal data to other companies.
- **Owners**
    - We disclose your personal data to other companies.
- **People in charge of a company**
    - We disclose your personal data to our customers along with the information concerning the company based on the contract we have with our customer.
    - Information about data subjects in charge of a company can be disclosed to parties that want this data. Requesting this data does not require a specific reason.
    - Data can be disclosed without customership with Asiakastieto so, that the identity of the user is not verified.
- **Beneficial owners**
    - We disclose your personal data to companies, that are required by the Act on Preventing Money Laundering and Terrorist Financing to be aware of the beneficial owners of the parties they do business with.

Your personal data may also be disclosed to our processors to be processed on our behalf.

8. Transfers of personal data outside EU/EEA area

Your personal data may in some situations be disclosed outside EU/EEA area for example to the processors we use. In these situations we ensure that your personal data is secured to an adequate level. We also use Standard Contractual Clauses and other measures to protect your personal data.

9. Profiling and automated decision-making

Asiakastieto does not process your personal data for profiling or automatic decision- making purposes.

10. Retention periods

- **Decision makers**

    - Your personal data will be kept for 12 months after it´s been registered or updated.
- **Owners**
    - Your personal data will be kept for as long as you are owner of the company.
- **People in charge of a company**
    - Your personal data is deleted within one year of the information being deleted from the authority public register.
    - If the company has a payment default entry recorded at above mentioned time, your personal data will be kept until the payment default entry is deleted.
- **Beneficial owners**
    - Your personal data will be kept according to above for as long as data concerning owners and people in charge of a company are kept.

11. Your rights

You as the data subject whose personal data Asiakastieto is processing, have several different data subject rights towards us as the controller. Below you will find information on how to exercise these rights. We will process your request and respond to your request without undue delay and in any event within one month of receipt of the request.

- Right to information

If phone call with you is recorded, you will be separately informed about this at the beginning of the call.

    - **Decision makers**
        - You will be informed about processing your data by email or phone and you will receive the privacy notice.
    - **Owners**
        - You will not be informed about the processing of your personal data since it is impossible due to us not processing your contact details.
    - **People in charge of a company**
        - You will not be informed about the processing of your personal data since it is impossible due to us not processing your contact details.
    - **Beneficial owners**
        - You will not be informed about the processing of your personal data since it is impossible due to us not processing your contact details.
- Right of access
    - If you want to know what personal data we process about you, please send an email to omatieto@asiakastieto.fi. We also provide secure email which you can access here https://mail.asiakastieto.fi/. If you want to limit your request to certain type of data please communicate that in the email.
- Right to rectification

- If you want to request rectification of incorrect personal data concerning you, please send an email to omatieto@asiakastieto.fi. We also provide secure email which you can access here https://mail.asiakastieto.fi/.
- **People in charge of a company and beneficial owners**

  - If some of your personal data is incorrect and it is not due to Asiakastieto mistake, we advise you to contact Trade register to get the data rectified.

- Right to erasure
  - If you want to request erasure of personal data concerning you please send an email to omatieto@asiakastieto.fi. We also provide a secure email which you can access here https://mail.asiakastieto.fi/.
  - **Owners, people in charge of a company and beneficial owners**
    - You don´t have right to erasure since your personal data is processed based on public interest.
- Right to restriction of processing
  - If you want to request restriction of processing of your personal data please send an email to omatieto@asiakastieto.fi. We also provide a secure email which you can access here https://mail.asiakastieto.fi/.
- Right to data portability
  - You don´t have the right to data portability, since Asiakastieto is not processing your personal data based on consent or for performance of contract between you and Asiakastieto.
- Right to object
  - You have the right to object, on grounds to your particular situation, the processing of your personal data which is based on public interest (art 6.1 e) or legitimate interest (art 6.1 f).
  - If you want to exercise your right to object to processing please send an email to omatieto@asiakastieto.fi. We also provide a secure email which you can access here https://mail.asiakastieto.fi/.
  - If you want to object to processing your data for marketing purposes, please send an email to above mentioned email address and we will stop processing your personal data for this purpose immediately.

12. Updating this privacy notice

This privacy notice can be updated time to time and new version will be published on this site.

13. Contact info and possible complaints

If you have questions about how we process your personal data, please contact our customer service at omatieto@asiakastieto.fi. We also provide a secure email which you can access here https://mail.asiakastieto.fi/.

Asiakastieto has appointed a Data Protection Officer. You can contact the DPO by sending email to dpo(a)enento.com.

If you are not satisfied with how we process your personal data, you have the right to file a complaint with supervisory authority, The Data Protection Ombudsman (Lintulahdenkuja 4, 00530 Helsinki, tietosuoja(a)om.fi)

Privacy notice has been updated 9/2026