

Updated 1 July
2020

<p>1 Data controller</p>	<p>Name: Orton Oy (Business ID 2280979-1)</p> <p>Address: Tenholantie 10 FI-00280 Helsinki</p> <p>Contact information telephone number exchange +358 9 474 81 email address: orton@orton.fi</p>
<p>2 Persons responsible for the register</p>	<p>Person responsible for the register: Leena Ristolainen, leena.ristolainen@orton.fi</p> <p>The above responsible person processes, for example, requests for error rectification or data erasure.</p>
<p>3 Data Protection Officer</p>	<p>Sonja Åkerlund Data Protection Officer</p> <p>Postal address: Orton Oy, Tenholantie 10, FI-00280 Helsinki email: tietosuojavastaava@orton.fi</p>
<p>4 Contact details in matters concerning the register</p>	<p>Markus Orava Chief Executive Officer</p> <p>Orton Oy, Tenholantie 10, FI-00280 Helsinki markus.orava@orton.fi, telephone: +358 9 47 481</p>
<p>5 Name of the register</p>	<p>TRAINING REGISTER</p>
<p>6 Purpose of processing personal data</p>	<p>Personal data is processed for the purpose of implementing the agreement between the data controller and the data subject and, where applicable, on the basis of the data subject's consent, in connection with and to enable orders, registrations, contacts, transactions, marketing, reporting and other customer relationship management measures.</p> <p>Purchase and transaction data processed in the register, as well as location information, can also be used for profiling and to target marketing measures and customer communications to the data subject's interest. Personal data is also processed in connection with the sending of the newsletter and participation in events and other marketing activities.</p>
<p>7 Basis for the processing of personal data</p>	<p>The processing of personal data described above is based e.g. on the following provisions:</p> <ul style="list-style-type: none"> <input type="checkbox"/> EU General Data Protection Regulation 2016/679

8 Data content of the register	<p>The following are stored concerning the data subject</p> <ul style="list-style-type: none"> - first and last name - address - email
	<ul style="list-style-type: none"> - telephone number - occupation - invoicing information - other necessary information related to the event
9 Regular data sources	<p>Data is obtained from:</p> <ul style="list-style-type: none"> - the data subject himself/herself
10 Categories of recipients of personal data	<p>Register data may be shared within the organisation. In addition, register data is transferred to the specified processor.</p>
11 Regular disclosures of data	<p>Data will not be disclosed outside Orton Oy or the parties involved in the maintenance of the application related to its event management system, except in accordance with consent and regulations.</p>
12 Retention period	<p>Data is stored in the register until the person in the training register cancels his or her registration.</p> <p>A person in the training register can delete his or her data from the register by clicking on the link online (www.orton.fi) or in the training letters sent electronically.</p>
13 Rights of the data subject	<p>The data subject has the following rights:</p> <ul style="list-style-type: none"> • Right of access to personal data (Article 16) ○ the data subject may submit an electronic request for information via the security mail found on the company's website <ul style="list-style-type: none"> ○ to send a request for information by letter • Right to rectification (Article 16) ○ the data subject may submit a written claim for rectification • Right to erasure (Article 17) ○ the data subject may request the erasure of data that is unnecessary or incorrect for the purpose of the register • Right to restriction of processing (Article 18) ○ the data subject may make a free-form claim, which is always processed on a case-by-case basis • Right to objection (Article 21) ○ the data subject may make a free-form claim, which is always processed on a case-by-case basis • Right to transfer data from one system to another (Article 20) ○ the data subject may make a free-form claim, which is always processed on a case-by-case basis <p>Instructions and mailing addresses can be found on Orton Oy's website.</p> <p>In certain situations, the data controller may, for justified reasons, refuse to comply with the data subject's claims on the grounds provided for by law.</p>
14 Transfer of data outside the EU or EEA	<p>Only with the consent of the data subject.</p>

<p>15 Principles of register protection</p>	<p>The register is maintained as a technical record by the data controller or by an authorised party. The information system is protected by appropriate technical protection against external data breaches. Access to the register is monitored with user-specific usernames and passwords.</p>
<p>16 Right to lodge a complaint with the supervisory authority</p>	<p>Without prejudice to other administrative appeals or remedies, every data subject has the right to lodge a complaint with the supervisory authority, in particular in the Member State in which he or she has a habitual residence or place of employment or where the alleged breach has occurred, if the data subject considers that the processing of personal data concerning him or her is in breach of the EU General Data Protection Regulation.</p> <p>Details of the supervisory authority:</p> <p>Office of the Data Protection Ombudsman</p> <p>Visiting address: Ratapihantie 9, 6th floor, FI-00520 Helsinki Postal address: P.O. Box 800, FI-00521 Helsinki Exchange: +358 29 56 66700 Fax: +358 29 56 66735 Email: tietosuoja(at)om.fi</p>