

<b>1 Data controller</b>	<p><b>Name:</b> Orton Oy (Business ID 2280979-1)</p> <p><b>Address:</b> Tenholantie 10 FI-00280 Helsinki</p> <p><b>Contact information</b> telephone number +358 9 4748 2705 email address: orton@orton.fi</p>
<b>2 Persons responsible for the register</b>	<p>Person responsible for the register: Laura Helle, Communications Manager of Orton Oy.</p> <p>The above person processes, for example, requests for error rectification or data erasure.</p>
<b>3 Data Protection Officer</b>	<p>Sonja Åkerlund Data Protection Officer</p> <p>Postal address: Orton Oy, Tenholantie 10, FI-00280 Helsinki email: tietosuojavastaava@orton.fi</p>
<b>4 Contact details in matters concerning the register</b>	<p>Mika Paavola Chief Executive Officer</p> <p>Orton Oy, Tenholantie 10, FI-00280 Helsinki email: firstname.lastname@orton.fi</p>
<b>5 Name of the register</b>	<b>PRIVACY STATEMENT FOR ORTON OY'S WEBSITE</b>
<b>6 Purpose of processing personal data</b>	<p>Orton Oy's website has forms for contact requests and inquiries. Inquiries, requests and feedback sent through forms will only be used to respond to requests, provide services or develop operations. Personal data or contact details sent through forms will not be used for direct marketing purposes.</p>

<b>7 Data content of the register</b>	<p>The following data concerning the data subject can be saved in the customer register:</p> <ul style="list-style-type: none"> <li>• content provided by the customer: e.g. name, contact details (e.g. telephone and mobile phone number, email address and other electronic address information and postal address), language of communication, inquiries, wishes, customer feedback, additional information, interests, satisfaction information or other similar information</li> <li>• information related to the processing of the customer's data, e.g. storage date and data source □</li> </ul>
<b>8 Regular data sources</b>	<p>Data is obtained from:</p> <ul style="list-style-type: none"> <li>• the data subject himself/herself</li> <li>• necessary personal data and contact details provided by a family member or guardian</li> <li>• other person who recorded the contact</li> </ul>
<b>9 Categories of recipients of personal data</b>	<p>Recipients related to customer service:</p> <ul style="list-style-type: none"> <li>• Orton Oy's customer service personnel</li> <li>• Person(s) of Orton Oy's service production affected by the feedback</li> </ul> <p>Orton Oy's website operators:</p> <ul style="list-style-type: none"> <li>• The personnel responsible for maintaining Orton Oy's website or the subcontractors responsible for maintaining the website, who are contractually committed to the European Union's model agreements.</li> </ul> <p>The data is transmitted through the forms on the website to the customer service email and is stored on the website server.</p>
<b>10 Regular disclosures of data</b>	<p>Customer data will not be disclosed outside Orton Oy or the parties involved in the maintenance of its website, except in accordance with agreements, other consent and regulations.</p>
<b>11 Retention period</b>	<p>Personal data is stored for up to one day (24 hours) on the website server</p>

**12 Rights of the data subject**

The data subject has the right to receive information on what data is collected, for what purposes the data is used, what is the legal basis for processing the data and to whom the data is disclosed.

The data subject has the right to receive confirmation of whether personal data concerning him or her is being processed. If processed, the data subject has the right to receive a copy of the personal data.

The data subject has the right to demand that inaccurate and erroneous personal data concerning him or her be rectified and the right to have incomplete personal data supplemented.

The data subject has the right to request the erasure of personal data concerning him or her without undue delay. Erasure requires that one of the following be met:

- the personal data is no longer needed for the purposes for which it were collected or otherwise processed
- the data subject withdraws the consent on which the processing was based and there is no other legal basis for the processing
- the personal data has been processed unlawfully
- the personal data must be erased

	<ul style="list-style-type: none"> <li>• in order to comply with a statutory obligation under European Union or national law</li> </ul> <p>Where processing is based on the legitimate interest of the data controller, the data subject has the right to ask the controller to restrict the processing if one of the following is met:</p> <ul style="list-style-type: none"> <li>• the data subject disputes the accuracy of the personal data</li> <li>• the personal data has been processed unlawfully</li> <li>• the controller no longer needs such personal data for the purposes of processing, but the data subject needs it to establish, exercise or defend a legal claim</li> </ul> <p>The data subject has the right to withdraw his or her consent to the processing at any time, without prejudice to the lawfulness of the processing carried out before this on the basis of consent.</p> <p>The data subject has the right to receive the personal data concerning him or her which he or she has provided in a structured, commonly used and machine-readable format and the right to transfer that data to another controller.</p> <p>If the data subject exercises his or her rights or wishes to receive further information on the processing of personal data, he or she must contact the controller mentioned in this statement.</p> <p>In addition to the name, the inspection/rectification/erasure request must contain other information that identifies the feedback issue, on the basis of which feedback from the customer can be retrieved from the register</p> <p>Mailing addresses for a free-form application can be found on Orton Oy's website.</p>
<b>13 Transfer of data outside the EU or EEA</b>	Personal data will not be disclosed outside the European Union or the European Economic Area.
<b>14 Principles of register protection</b>	Access to the data is only possible with the personal username and password of an authorised employee or subcontractor. The data is located on the controller's closed network, which is protected by a firewall.
<b>15 Right to lodge a complaint with the supervisory authority</b>	<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><b>Office of the Data Protection Ombudsman</b></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>