

PRIVACY STATEMENT FOR CUSTOMERS AND STAKEHOLDERS

Controller Steveco Oy, Kirkkokatu 1, FI-48100 Kotka,
Business-ID: 0680042-0
05 23231

Data Protection Officer tietosuoja(at)steveco.fi

1 Preface

This privacy statement describes how Steveco (Steveco Corporation and its subsidiaries, “Steveco”) collects, processes, and protects your personal data.

We give you additional privacy information in the other specific Privacy Statements which relate to camera- and access control as well as the Whistleblowing channel.

2 The purpose for processing personal data

We collect and use personal data about you to enable us to process orders, deliver products and services, to provide customer service and to manage payments, contracts, and transactions.

In addition to service delivery and customer service, we may contact you about relevant topics such as Steveco’s latest news, products and services, or disturbance notifications if any may occur.

3 Data being processed

We collect and process the following personal data, where applicable and depending on your relationship with us:

- Name
- Email address
- Address
- Phone number
- Professional details
- Company contact details (such as name, address and invoicing details)
- Possible KAM grading

May a customer be a private person, Steveco will collect one’s social security number.

Privacy Statement

4 Legal bases for processing personal data

We will use your personal data for predefined purposes based on contract, consent, and legitimate interest. Data from online and offline sources may be combined for these purposes, to the extent you have not opted out when applicable.

Contract

The legal basis for processing your data for service delivery and customer service (including order processing, services, management of payments, contracts, and transactions) is typically contract based. (GDPR 6 art. 1 b)

Consent

We will ask for your consent in our webpage to deliver certain customer service and provide information of our services. The personal data is collected when you order or use our services or when you fill in a form of interest. (GDPR 6 art. 1a)

Legitimate interest

We collect personal data for customer marketing and information sharing based on legitimate interest. We send these communications to the work contact address which we have received from the customer, their organization, or a public source (i.e. public address registers or marketing events) (GDPR art 6, 1 f)

5 Collecting the personal data

The personal data which we process about you comes from different sources:

We collect personal data from you and your organization, when you order or use our services, when you fill in a form in our webpage, or when you otherwise interact with us.

We also may collect personal data from third parties or otherwise publicly available sources. These include public address registers, websites, or common forums such as marketing events or PR events.

6 Transferring the personal data with third parties

Your data may be transferred to third parties according to our national legislation. This includes processes with the Finnish Customs, tax office or the insurance companies.

We may also transfer data between our trusted partners with whom we do business with to enable the services provided to our customers. We ensure that the processing of your personal data complies with our Code of Conduct and all legal requirements, such as the EU General Data Protection Regulation (GDPR).

7 Transferring the personal data to third countries

We do not transfer your personal data to third countries outside of EU or ETA.

We may have to transfer data outside of EU/ETA if the contract, service or location of the contact person requires such. In such cases, Steveco relies on appropriate safeguards, such as the European Commission's adequacy decisions and the EU-US Data Privacy Framework or standard contractual clauses issued by the European Commission, to protect your data when transferring it.

8 Storing the personal data

We delete or de-identify personal data when it is no longer necessary for the defined purposes. The Controller of the personal data evaluates the necessity of the data periodically. The maximum retention period is 6 years from the end of the customer relationship.

Data needed for general defence of legal rights (e.g. transaction details, CRM documentation) are stored according to national statutes of limitation – ongoing year and 3 years.

Customs documentations are stored according to national statutes of limitation – ongoing year and 6 years from import procedures.

E-service personal data is stored 6 months from last contact/use.

Chat-services and log details are stored 365 days.

9 Protection of your personal data

We employ appropriate organizational and technical security measures to protect your data from loss or misuse. We have a cybersecurity governance model which describes roles and responsibilities at Steveco, and our instructions give detailed information on how personal data must be handled within our company. By conducting awareness programs, we engage our employees in privacy and security considerations. Where we contract with third party suppliers to provide services that may enable them to access your personal data, we require them by contract to have similar security controls in place.

The protection of your personal data is audited every now and then to guarantee the safety of your data.

10 Your rights and how to use them

Below, you can see your rights regarding the personal data that we process about you.

Right to access personal data

You have the right to be informed about the processing that we do and to request a copy of your personal data.

Right to correct personal data and right to deletion

You can ask for the information about you to be corrected if it is not accurate or if it needs to be updated. We will delete the data at your request if it is no longer legitimately needed.

Right to restrict the processing

In certain circumstances you have the right to have the processing restricted.

Right to data portability

You can obtain and reuse the personal data you have provided us. We can provide a selected set of the data delivered in a machine-readable format, where the basis of processing has been either contract or consent.

Right to object to the processing

You have the right to object to the processing of your personal data on our legitimate interests. We may reject your request if there is a compelling reason for continuing the processing.

Right to withdraw your consent

If you have given a consent for data processing, you are always entitled to withdraw your consent.

Right to opt out from automated decision making

You have the right to object any automated decision-making process (not utilized at Steveco).

Exercise of your rights

If you have any question about your rights or want to exercise them, please contact us by using the tietosuoja(at)steveco.fi email address or by filing a request via our whistleblowing channel. Some rights may not be applicable for example if the data cannot be connected to you.

We will respond to the request without undue delay, in any case no later than one month after receiving the request.

11 The right to file a complaint to the data protection authority

If you are not satisfied with the way we handle personal data, or we do not act in accordance with your requests, you can contact your national data protection authority. The national supervisory authority and its contact details has been provided below:

Office of the Data Protection Ombudsman
Postal address: P.O. Box 800, 00531 Helsinki, Finland
E-mail: tietosuoja(at)om.fi
Switchboard: 029 566 6700

12 Informing the personal data collection

This privacy statement describes how Steveco (Steveco Corporation and its subsidiaries, "Steveco") collects, processes, and protects your personal data. You have been informed of the personal data collection via our website while you have ordered or used our services or when you filled in a form of interest.

Steveco reserves the right to amend this Privacy Statement. Possible amendments to the Privacy Statement will be notified about on our website, or by communicating directly to you.