



## PREMIUM GROUP PRIVACY POLICY PREMIUM GROUP MARKETING REGISTER

This privacy statement applies to Premium Group (vat number 2636597-2) as well as all companies belonging to Premium Group: Premium Accounting (2569193-6), Premium Advisors (2392722-0), Premium Coaching Academy (2889482-7) and Premium Law (2442475-6), later collectively Premium Group.

The practices and actions in this policy apply to such personal data which is collected or stocked by any of the companies and which is in a register kept by one of the companies belonging to Premium Group.

### 1. DATA CONTROLLER

Premium Group (2636597-2)

### 2. CONTACT PERSON IN MATTERS CONCERNING THE REGISTER

Jaana Heikkinen  
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### 3. NAME OF THE REGISTER

Premium Group Marketing register

### 4. THE PURPOSE OF PROCESSING PERSONAL DATA

The data of people who have made a request for proposal from the company or of natural persons regarded as potential customers by the companies belonging to Premium Group is collected in the marketing register.

The information of the data subjects of the marketing register is used for communication between the company belonging to Premium Group and a natural person or a natural person functioning as a contact person for a legal person, and to accomplish the offer made of the services provided by Premium and for networking. With the information, the authority of a natural person concerning requests for proposals is also ensured.

### 5. THE DATA IN THE REGISTER

Concerning the data subjects, data that is essential for the purpose is collected in the register. These include:

- first and last name of a natural person
- first and last name of a natural person acting as a contact person for a legal person
- address, postal code and city
- phone number and email address

### 6. SOURCES OF DATA FOR THE REGISTER

Collecting data is based on data subjects voluntarily providing information and on the independent identifying of potential customers done by the companies belonging to Premium Group.



Data can also be retrieved from a register maintained by a third party to which the data subject has submitted their information and given consent to transfer it to Premium Group.

## 7. DATA PROCESSING

Premium Group processes data only to the extent notified in this privacy policy and within the operation of the companies belonging to Premium Group following the requirements set in the Personal Data Act.

Premium Group uses the data confidentially and only to the extent necessary.

## 8. ACCURACY OF THE DATA

Premium Group is not responsible for the accuracy of the information given by the data subject or a third party.

## 9. THE RIGHT OF ACCESS

Premium Group keeps the privacy policy available to the data subject. According to the section 26 of the Personal Data Act, a person has the right to review their own data that is in a register or to be informed that there is no data concerning them in the register. The data subject is also informed of the sources of the register and what the data in the register is used for.

The data subject has the right to demand the rectification, completion and erasure of inaccurate data concerning them.

The request for access or rectification must be sent in writing and signed to the contact person of the register.

## 10. OTHER POSSIBLE RIGHTS

According to the section 30 of the Personal Data Act, the data subject has the right to prohibit the controller to process their data for direct advertising, distance selling and other direct marketing as well as market research or opinion polls.

A data subject objecting to the processing of data concerning themselves must direct the restrictions in writing to the contact person of the register.

## 11. RETENTION AND DESTRUCTION OF DATA

Premium retains the register data it administers as long as it is essential and necessary for the purpose of the notified action. Premium estimates the adequate storage period on a case-by-case basis.

Print outs containing personal data are processed as confidential waste and kept in such a manner that outsiders have no access to the data.

## 12. DISCLOSURE OF DATA

Personal data is not given to outsiders without the consent of the data subject.



The personal data in the register is not transferred outside the EU or the European Economic Area without the specific consent of the data subject not including situations in which the transfer of data is required to complete the service agreement ordered by the data subject.

### 13. PROTECTION OF THE REGISTER

Only people who are authorized to carry out the task have access to the marketing register of Premium Group. The use of the register requires a personal username and a password from each authorized person. In addition, the register is protected through technical security measures by the service provider used to maintain the register.