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# **Data Protection Policy**

#### **Data controller**

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# The purpose of data collection and permission to process

Kensa Ltd. (Kensa) uses the personal data it collects from its customers (Customer) to manage its customer relation related duties, such as marketing, sales, production of products, delivery of products etc.

The protection of customer data is of utmost importance to us. When processing information given by Customer, Kensapuu commits itself in its activities to comply with the valid legislation in relation to Data Protection and Processing of Personal Data (Finnish Data protection and European Union's General Data Protection Regulation 2016/679).

Customer gives Kensa permission to process customer's personal data when it orders products from Kensa, by a separate mutual agreement or otherwise. When Kensa processes personal data provided by Customer which involves personal data of the end Customer i.e. resellers' own customer, Kensa does not act as a data controller as per GDPR, but as a data processor instructed by Customer.

### **Data Sources**

Kensa processes the following data in relation to Customer:

- name, address, contact details, logging information to Kensa's services
- email address
- customer feedback
- comments
- photos
- permits, prohibitions, consents
- possible personal data for the purpose of invoicing

#### Possible ways of collecting data

- information given by Customer
- information found from the Internet
- information contained in emails
- information received from mobile applications
- information received from third Parties for example: analysis of data, marketing data, marketing bans and marketing permissions, Google Analytics, Facebook etc.

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#### **Disclosure of information**

Kensa may disclose information about Customer to its cooperation partners in order to be able to offer Customer for example logistics services or IT-solutions. In other cases Kensa does not disclose information about Customer to third Parties, except in situations required by law or by Customer's written permission.

# The use of tracking technologies

Kensa may use beneath mentioned tracking technologies in order to offer a better user experience. By using Kensa's website Customer accepts the use of underneath mentioned tracking technologies.

- cookies
- Google Analytics and other similar programs/services which measure or track.

### Processors of personal data and instructions

- Kensa's personnel whose duties include data processing
- cooperation partners (in outsourced services)

# Instructions for data processing

- work instructions for employees
- Data Processing Agreements between cooperation partners

# Disclosure of personal data to third countries

Kensa stores personal data on safe servers located within EU or EEA. Information is not disclosed outside EU or EEA.

# Protection principles of registers

In order to safeguard its registers Kensa uses among others the following measures: usernames, passwords, security softwares, data centres and cloud services provided by reliable cooperation partners, backups and cost control.

### Rights of the Data Subject

Customer is entitled to receive a copy of personal data which Kensa holds in its register of the said Customer if Customer makes a request for it.

#### Storage time of Personal Data

Kensa stores Customer's personal data for so long as it is necessary to do so in order to manage the customer relation. In any event, Kensa stores Customer's personal data at least the minimum time required by law (for example the Act relating to the keeping of books of account).

# **Changes to Data Protection Policy**

Kensa is entitled to define more closely or change its Data Protection Policy if needed, for example should the law change. Kensa provides the Customer with an updated document on Data Protection if necessary.