

Privacy Policy

TWIG customer and business partner register

25 May 2018

Twig Com Ltd follows policies and processes to protect Personal Data in compliance with Data Protection Laws, most notably Regulation 2016/679 of the EU ("GDPR").

1. Controller

Twig Com Ltd ("Twig Com"), Lairolantie 14, FI-24910 Halikko, Finland. ID 2380206-5

2. Register

Twig Com Ltd customer and business partner register

3. Contact Person

Jukka Nieminen, jukka.nieminen@twigcom.com, +358 40 5105058

4. Purpose of Register and legal grounds for processing Personal Data

Personal Data is stored and processed for legitimate business purposes, including:

Facilitating transactions and communication with actual and prospective customers and business partners

One-on-one communication with contact persons of actual and prospective customers and business partners

Group communication ("Newsletters") to contact persons of actual and prospective customers and business partners

Invoicing and payment of invoices

Forwarding and delivery logistics

Managing customer accounts, user access and billing for TWIG website, TWIG partner Area, TWIG Point services and TWIG WebFinder ("Services")

Other purposes required for complying with legal requirements

5. Classification and profiling

Twig Com may classify or profile Registered Individuals, either manually or automatically, for the purpose of better targeting relevant communication to actual or prospective customers and business partners.

6. Rekisterin sisältämät tiedot

Personal Data in the Register:

Name

Phone number

Email address

Employer name and address, as applicable

Personal address, as applicable

We may use cookies to improve and optimize our services by collecting the following data of the website usage: Language and localization settings; Information about the internet browser used, about the internet service provider, device and operating system.

For logging purposes, we may also store the IP-address from which the Service accessed.

7. Data sources

Personal Data in the Register is collected from the Registered Individual.

8. Storing period of Personal Data

Personal Data is stored for the duration of the business relationship or the prospective business relationship. Some Personal Data may be required to be stored for a given period to comply with relevant legislation.

9. Transmitting or disclosing Personal Data

Personal Data may be transmitted to Sub-Processors, such as cloud service providers, business cloud software providers and telecommunication providers. Sub-Processors may operate or store Personal Data inside or outside EU. Twig Com as the Controller has agreements with Sub-Processors so as to comply with Data Protection Laws.

10. Processing Personal Data and general data security principles

The Personal Data Register is secured by technical and organisational means. Personal Data is stored on servers and systems protected by firewalls, passwords and other means. Access to Personal Data is granted only if necessary for processing. All Processors of Personal Data are under appropriate obligation of confidentiality.

11. Contact us

For any questions regarding processing of Personal Data please contact the Contact Person, see section 3 above.

RIGHTS OF THE REGISTERED INDIVIDUAL

Specific rights of the Registered Individual under the Data Protection Laws include:

Right to access information

Processing Personal Data is required to be transparent. The Controller is obliged to inform you of Processing practices when collecting and processing Personal Data. You must be informed of Controller, its representative, purpose of Processing Personal Data, disclosure of Personal Data, and rights of Registered Individuals. Privacy Policy shall be available of every Personal Data Register, containing name of Controller, which Personal Data is stored and what are they used for.

Right to review

On request you have the right to know which Personal Data of you, if anything, is in the Register. You have the right to know where your Personal Data is acquired from for the Register, what is it used for and where is it disclosed.

Exercising the right to review

Address your request to the Contact Person in the Privacy Policy. Should Controller refuse your request, are they required to provide you with a written statement detailing reasons for refusal. Then you can turn to the Privacy Ombudsman, or to Controlling Authority.

Right to revise your Personal Data

You have the right to be appraised based on correct Personal Data. Only Personal Data required for the defined purpose of Processing may be stored in Register. Controller shall inform also disclosee and source of incorrect Personal Data of the revision. Address your request to revise Personal Data directly to Controller. If Controller refuses the revision they shall provide you with a written statement detailing reasons for refusal. Then you can turn to the Privacy Ombudsman, or to Controlling Authority.

Right to refuse

You have the right to refuse the Controller to Process your Personal Data (“Opt-out”) for specific purposes, such as direct marketing, telesales or market research. To refuse, please use the Opt-out function of Services, or contact the Contact Person in the Privacy Policy. If you cannot resolve the matter with Controller, you can contact the Privacy Ombudsman. If the matter may involve a criminal act under Data Protection Laws or criminal code, you can file a police report.

Controlling Authority:

Tietosuojavaltuutetun toimisto

Rahapihantie 9, 6. krs. FI-00520 Helsinki, Finland

P.O. Box 800, FI-00521 Helsinki, Finland