

## PRIVACY STATEMENT FOR THE PERSONAL DATA REGISTER OF THE KASVUCRM CUSTOMER RELATIONSHIP MANAGEMENT SYSTEM

This privacy statement concerns the practices associated with the personal data register of a customer data system (hereafter referred to as the KasvuCRM customer relationship management system) referred to in the Act on customer data systems for business service (293/2017). The statement explains how users of the KasvuCRM system (hereafter referred to as Joint Controllers) process the personal data of their current and potential customers' contact persons as part of their customer relationship and marketing activities.

The Joint Controllers undertake to comply with the data protection and personal data legislation valid in Finland, including the EU General Data Protection Regulation (GDPR) as well as any other acts and statutes applicable to their activities that direct the processing of personal data, and to process personal data in accordance with good data management and processing practices.

### REGISTER NAME

Personal data register of the KasvuCRM customer relationship management system

### JOINT CONTROLLERS, THEIR RESPONSIBILITIES, AND CONTACT POINTS FOR DATA PROTECTION ISSUES

The KasvuCRM customer relationship management system is a joint system in which the parties who record data in the personal data register each serve as controllers of their data and are responsible for ensuring that the data they have recorded are correct and up to date. The KasvuCRM customer relationship management system is owned by the Ministry of Economic Affairs and Employment, which is responsible for the system's general functioning and technical interface for recording, combining, disclosing and other processing of data, along with the usability of the system and the integrity, protection and storage of the data contained therein.

The Joint Controllers and their data protection officers can be contacted about issues relevant to this personal data register through the contact points listed below:

Organisation & data protection officer's contact details	Contact point for matters /requests related to data subjects' rights
Ministry of Economic Affairs and Employment <a href="mailto:tietosuojavastaava.tem@gov.fi">tietosuojavastaava.tem@gov.fi</a>	<a href="mailto:kirjaamo.tem@gov.fi">kirjaamo.tem@gov.fi</a>
Economic Development Centres and KEHA Centre <a href="mailto:tietosuoa@keha-keskus.fi">tietosuoa@keha-keskus.fi</a>	<a href="mailto:Toimipaikkojen_yhteystiedot - Elinvoimakeskus">Toimipaikkojen yhteystiedot - Elinvoimakeskus</a> <a href="mailto:kirjaamo@keha-keskus.fi">kirjaamo@keha-keskus.fi</a>
Ministry for Foreign Affairs <a href="mailto:tietosuoa.um@gov.fi">tietosuoa.um@gov.fi</a>	<a href="mailto:kirjaamo.um@gov.fi">kirjaamo.um@gov.fi</a>
Finnish Safety and Chemicals Agency TUKES <a href="mailto:tietosuoa@tukes.fi">tietosuoa@tukes.fi</a>	<a href="mailto:tietosuoa@tukes.fi">tietosuoa@tukes.fi</a>
Innovation Funding Agency Business Finland, business ID: 0512696-4 <a href="mailto:tietosuoa@businessfinland.fi">tietosuoa@businessfinland.fi</a>	<a href="mailto:tietosuoa@businessfinland.fi">tietosuoa@businessfinland.fi</a>
Business Finland Oy, business ID: 2725690-3 <a href="mailto:tietosuoa@businessfinland.fi">tietosuoa@businessfinland.fi</a>	<a href="mailto:tietosuoa@businessfinland.fi">tietosuoa@businessfinland.fi</a>
Finnvera, business ID: 1484332-4 <a href="mailto:tietosuojavastaava@finnvera.fi">tietosuojavastaava@finnvera.fi</a>	<a href="http://www.finnvera.fi">www.finnvera.fi</a> -> Online Service -> Messages; heading Other

## PURPOSE AND DATA CONTENT OF THE REGISTER AND GROUNDS FOR PROCESSING DATA

The personal data in the KasvuCRM customer relationship management system's personal data register are used in the customer relationship and marketing activities of the controllers' current and potential customers for business promotion purposes. The register may be used to record and process public data associated with companies and non-disclosable information laid down in law. The following data on a company's contact persons and officers may also be recorded in the register; all the data listed below may not be recorded on all persons:

- Identifiers: name, home country, domicile, postal address, e-mail address, telephone number as well as the person's title and role in the company
- Additional information: Alias; name, address and title in native language; address and title; the country in which the person works; industrial sector; capital investment profile; expert classification; work description; other description
- Information on business advice or other services provided for the person and identifiers of a person for whom service has been provided
- Data on any changes to the data listed above.

The register may contain data on private entrepreneurs processed as personal data, including the operator's name and business ID.

The register may also contain other notes related to data subjects and their potential customer relationships as well as other information needed for the proper management of a customer relationship. This information may include data on the data subject's past or future **participation in events or contact requests, or data on services ordered by the data subject, their delivery and billing.**

Depending on the case, the processing of personal data will be based on one of the following:

Contract	Processing is necessary to prepare or perform a contract to which the data subject is a party.
Legal obligation	Processing is necessary to fulfil the controller's legal obligation.
Public interest or exercise of official authority	The processing is necessary for the performance of a task carried out in the public interest or for the exercise of official authority vested in the controller. Such processing may be related, for example, to various enquiries by authorities where processing is not directly based on a legal obligation.
Legitimate interest of the controller or of a third party	The processing is necessary for the legitimate interests of the controller or of a third party. Actors other than public authorities may target business communication or enquiries relevant to

	the client organisation at the client organisation's contact person tasked with handling the matter.
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## DATA SOURCES

The personal data in this register are obtained either from

- a national customer information warehouse for business services (ATV)
- the data subject
- the data subject, collected by a third party in connection with events, or
- public data sources.

## STORAGE PERIOD OF PERSONAL DATA

The data collected in the register are stored for no longer than and only to the extent that this is necessary and allowed under legislation with regard to the original purpose for which the personal data were collected, or compatible purposes. Personal data that mainly concern natural persons are stored for no more than five years after they were last processed for the purposes of providing services. Data will not be erased, however, if preserving them is necessary in order to perform a statutory obligation or due to a pending matter.

In addition, the Joint Controllers will take every reasonable step to ensure that personal data which are inaccurate or outdated having regard to the purposes for which they are processed are rectified or erased without delay.

## PRINCIPLES OF REGISTER PROTECTION

The Joint Controllers have taken the appropriate technical and organisational measures to ensure that the personal data are protected against accidental or unlawful loss, disclosure, misuse, alteration, destruction or access.

Instructions for using the register have been issued within the Joint Controllers' organisations, and access to the register has been restricted by means of user rights, ensuring that the personal data recorded in the system can only be accessed and used by employees who have the right to do so because of their tasks and who need this data in their duties.

The information system used to process personal data has been sufficiently protected by technical measures, and access to it is protected by appropriate methods, including personal user IDs and passwords. Backup copies are made of the data in the register, and they can be recovered safely if necessary. Materials containing personal data are destroyed securely.

## DISCLOSURES AND TRANSFERS OF DATA AND AUTOMATED DECISIONS

The keeping of this register is based on the Act on customer data systems for business service (293/2017) under which data in the register may be disclosed, in addition to the Joint Controllers, to the Ministry of Agriculture and Forestry and the Finnish Food Authority.

Otherwise personal data will be disclosed to parties other than the Joint Controllers and the system owner in a format in which individual users could be identified in the following exceptional situations only: if obliged to do so under an act or an official order or by a court order, or if this is otherwise necessary to prevent or investigate suspected violations of an act, the terms of online service use or good practices, or to protect the rights of the Joint Controllers or third parties.

The personal data in the register will not be, as a rule, transferred or delivered to non-EU or EEA countries. However, data necessary for providing business services may be transferred, with some restrictions, to Business Finland Oy's subsidiaries and staff working in its foreign network in compliance with and within the limits of the data protection legislation.

No automated individual decisions or profiling will be carried out based on the personal data in the register.

## **DATA SUBJECT'S RIGHTS**

After providing details necessary for finding the data, a data subject has the right to know what data, or whether any data, on them have been recorded in the personal data register of the KasvuCRM customer relationship management system. The data subject may demand that any incorrect, incomplete or outdated data on them be rectified.

The data subject also has the right to request erasure of their personal data from the register, provided that the data are no longer necessary for the purposes for which they were collected or otherwise processed or that no legal obligations applicable to the Joint Controllers are associated with processing or storing the data or that some other legal ground for erasing the data exists.

The data subject also has the right to request restricting the processing of their personal data while they are waiting for the controller's response to their request to have their personal data rectified or erased, or in similar situations.

Where the processing is based on public interest or legitimate interest, the data subject may object to the processing of their personal data on grounds relating to their particular situation. The data subject always has the right to object to the processing of their personal data for the purposes of direct marketing.

The exercise of data subject rights is free of charge, but a fee based on administrative costs may be charged on a discretionary, case-by-case basis, especially if the requests are clearly unfounded or unreasonable.

Requests are addressed to one of the Joint Controllers whose contact details are given at the beginning of this statement. The Joint Controller who has received the access/rectification request will process the request together with the other Joint Controllers and respond to the sender. The aim is to respond to access requests within one month of receipt of the request.

There may be restrictions on the exercise of data subject rights. The controller is obligated to notify the data subject if their request cannot be met. The data subject has the right to file a complaint about the processing of their personal data at any time with the supervisory authority.

## **PRIVACY STATEMENT UPDATES**

This privacy statement was last updated on 9th January 2026.

The Joint Controllers will monitor any changes to data protection legislation and strive for continuous improvement of their activities. They thus reserve the right to update this privacy statement.