

PRIVACY NOTICE

CONTENTS

1	Purpose and scope of this privacy notice	1
2	Data controller contact information	1
3	Purposes and legal bases for the processing of personal data.....	2
4	Sources and retention times of processed personal data	3
5	Data transfers and recipients.....	4
5.1	Personal data transfer(s) outside EU/EEA	4
6	Your (data subject's) rights to control data processing	5
6.1	How to use these rights	5
7	Security measures	6
8	Version history and changes to this privacy notice	6

1 PURPOSE AND SCOPE OF THIS PRIVACY NOTICE

The purpose of this Privacy Notice is to inform how Sparta Consulting Oy (later “we” or “Sparta”) processes personal data e.g. how personal data is collected and used, and to whom the data is disclosed.

Sparta’s business is focused on information management and business development. This Privacy Notice concerns the persons (later “you” or “data subjects”) whose personal data Sparta processes in relation to our business activities; our website users, potential or current customers, vendors, partners and other stakeholders. (Our HR activities have two separate Privacy Notices, one for the job applicants and one for the employees.)

Sparta is committed to respecting your privacy and processing your personal information in accordance with applicable privacy laws and regulations. Personal data refers to information which allows a person to be directly or indirectly identified as an individual natural person (later “personal data”). Examples of personal data are name, address, date of birth and Internet Protocol (IP) address of a personal computer (PC).

NOTE! If you are under 16, we ask you to inform us of the matter to remove your personal details from our marketing related systems.

This Privacy Notice uses the privacy terms defined in the in Article 4 of European Union’s General Data Protection Regulation (2016/679) (“GDPR”).

2 DATA CONTROLLER CONTACT INFORMATION

Sparta Consulting Oy
Business ID: 2507061-1
Address: Kauppakatu 28 B, 40100 Jyväskylä, Finland
Email: privacy@spartaconsulting.fi

3 PURPOSES AND LEGAL BASES FOR THE PROCESSING OF PERSONAL DATA

We process personal data only for legitimate business purposes including to sell, offer, purchase or inform about products and services to/from you, or primarily the company you represent. The purposes and the legal basis for processing personal data are listed in the table below.

Purpose of processing of personal data	Legal basis for processing personal data
Contract creation, performance and management including orders, purchases, delivery, invoicing, payments, warranties, reclamations, communications and Sparta customer references (as separately agreed)	Contract performance and preparation
Customer or potential customer relationships and management, such as <ul style="list-style-type: none"> • Direct sales communications, including sales meetings and offers & quotations • Customer or potential customer, vendor, partner or other stakeholder relationship management including communications (e.g. feedback, inquires and satisfaction surveys) 	Legitimate interest to serve our current customers and potential customers
Marketing activities 1/2 <ul style="list-style-type: none"> • Marketing communications and other interactions e.g. via email or web pages • Marketing event related activities before, during and after events • Marketing and analysis activities in Sparta websites <p>Regarding Sparta's website, all analysis will be done on anonymized data. Non-anonymized data will be used with website communications functions, where a separate consent will be requested to commence communications.</p>	Legitimate interest to inform about and offer our products and services to potential customers
Marketing activities 2/2 <ul style="list-style-type: none"> • Electronic direct marketing to individuals e.g. newsletters • Marketing event related activities before, during and after events • Images, videos and sound recordings obtained in events and other occasions as separately agreed with individual customer, partner, etc. representatives • Marketing and analysis activities in Sparta websites <p>Consent given to Sparta can be withdrawn as instructed in marketing communications, or by directly contacting Sparta through the contact information provided in this document.</p>	Consent
<i>Continued on next page...</i>	<i>Continued on next page...</i>

Administration and internal development, such as <ul style="list-style-type: none"> Product and service planning, development and analysis based on e.g. feedback and other communications 	Legitimate interest to be able to offer better products and services
Administration of your possible consent or objection to processing your personal data, and requests to exercise your rights under GDPR (e.g. if you request Sparta to access or correct your data, see separate section on the rights of the data subjects)	Legal obligation
Information security and general fraud prevention	Legal obligation

4 SOURCES AND RETENTION TIMES OF PROCESSED PERSONAL DATA

Categories of personal data	Examples
Contact and identity information	Full name, address, telephone number, email address
Contract related data	Customer ID, payment data (e.g. bank account)
Communications content	Emails, web forms, chats
Electronic identification data	Internet Protocol (IP) address, username/userID, password/passcode, cookies, See Cookie Policy
Images, videos, sound recordings	Customer referral videos and images

Contact information and communications content are provided to Sparta either directly by the data subjects through contacting Sparta as a company or through meetings with individual Sparta representatives. Furthermore, they may also be provided in connection with utilizing services provided by Sparta. Contact information and communications content may also be provided to Sparta through service providers, such as call centre services or event organizers, or through public sources such as websites or social media channels.

Electronic identification data is obtained through Sparta websites.

Images, videos and sound recordings may be obtained in events and as separately agreed with individual customer, partner, etc. representatives. All publication of such material by Sparta will be done in agreement with the data subject.

The personal data retention periods depend on the type of personal data, how it was obtained and the purposes and/or legal basis for processing and storing the data.

We keep the personal data used for marketing purposes as long as you are target for our marketing activities and you have not objected to the marketing.

Contract related data (including possible contact and identity information, and communications content) is kept as long as the contract is valid and 5-11 years after the termination of the contract to be able to protect our rights regarding warranties, reclamations, claims etc and fulfil our legal obligations (such as storing accounting data)

Personal data processed for marketing purposes is kept as long as you are target for our marketing activities e.g. you have a valid newsletter subscription.

If not limited otherwise by a separate agreement, the Cookie Policy, your request or legislation, the retention time for other personal data specified in this document will be 2 years as a maximum.

5 DATA TRANSFERS AND RECIPIENTS

Category of recipients	Recipients
IT service provider	Pipedrive
IT service provider	Microsoft
Invoicing and billing	Procountor
Marketing activities (with explicit consent)	Google (incl. YouTube), Facebook, LinkedIn

5.1 Personal data transfer(s) outside EU/EEA

Personal data may be transferred outside of EU/EEA when it is processed in social media platforms utilized by Sparta.

Personal data processing regarding sales activities is done with a service hosted by Pipedrive. Utilizing the service transfers personal data to United States. Data transfer is protected under the Pipedrive Privacy Policy, which can be read here: <https://www.pipedrive.com/en/privacy>

6 YOUR (DATA SUBJECT'S) RIGHTS TO CONTROL DATA PROCESSING

You have the rights stated in the GDPR to make the requests presented here. We may request additional information if necessary to confirm the identity of the requestor, and answer the request at latest one month after the requestor has been identified.

- Right to access and rectification: You have the right to request us to inform you what personal data we process concerning you (or that no data is processed), and request us to correct your personal data that are incorrect or incomplete (or outdated)
- Right to erasure ('right to be forgotten') and right to restriction of processing: You have the right to request us to erase (or render anonymous) or restrict the processing of personal data concerning you that we process
 - o We will comply with your request unless we have a legitimate ground not to delete the data, in which case you will be informed (After we have deleted your personal data, all backups might not be deleted immediately, but as soon as reasonably possible)
- Right to object to processing: You have the to object to the use of all or some of your personal data for selected purposes
 - o We will comply with your request unless we have a legitimate ground to continue the processing (e.g. legal obligation), in which case you will be informed
- Right to data portability: You have the right to receive the personal data concerning you that you have provided in a structured, commonly used and machine-readable format, and have the right to transmit those data to another controller (if the processing is based on consent or on a contract, and the processing is carried out by automated means)
- Right to withdraw consent: If you have given your consent to certain processing, you have the right to withdraw your consent at any time regarding further processing of your personal data
- Right to lodge a complaint to the supervisory authority: You have the right to complain to the competent supervisory authority if you believe your personal data has been processed incorrectly, but please contact us first to solve the issue with us, thank you!

6.1 How to use these rights

You can use these rights by contacting us using the contact information found in the beginning of this Privacy Notice. The requests must be submitted in writing, and we need to confirm your identity, so we can make sure that we only disclose personal data to the person authorized to access the data. We may request additional information if necessary.

We will inform the recipients of your personal data if you have requested the data to be rectified, erased or restricted, unless this proves impossible (or involves disproportionate effort).

Where requests from a data subject are obviously unjustified or excessive, in particular because of their repetitive character, we may either:

- charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or
- refuse to act on the request.

7 SECURITY MEASURES

We process personal data in accordance with applicable data protection laws and regulations and ensure the compliance of the service providers (processors) with contractual measures (data processing agreements).

We have implemented modern technical and organizational security measures to protect personal data from unauthorised access or transfer and accidental or illegal destruction, loss or alteration. The information security and data protection of our systems and environments that contain personal data are managed appropriately as a whole. We ensure the security of the stored data, access rights and processing of the confidential and sensitive personal data.

Access to personal data is limited to those that need it for performing their work. Access is based on roles and the tasks and functions connected to that role. All persons processing personal data are required to treat the data as confidential. The users of the IT environment are identified and access to the systems is secured and limited by user rights. Access to the physical location is also based on individual access rights and access keys.

8 VERSION HISTORY AND CHANGES TO THIS PRIVACY NOTICE

Sparta will update this privacy notice whenever necessary due to e.g. changes in our processes or recipients, or in the applicable legislation. We will publish the changes on our website and document them in the version history below. Significant changes may be communicated directly to those persons whose personal data is affected (and whose contact data is available).

Published on 7.6.2018, v1.0

Version history:

Version	Change	Date
1.00	First publication	7.6.2018