Privacy Policy – Visual Components Oy
(v.201911)

1. Controller
Visual Components Oy
Vänrikinkuja 2, 02600 Espoo, FINLAND
+358925240800
info@visualcomponents.com
(hereafter “we”, “our” or “us”)

2. Contact person for register matters
Visual Components Oy
Vänrikinkuja 2, 02600 Espoo, FINLAND
+358925240800
webmaster@visualcomponents.com

3. Name of register
Customer and marketing register

4. What is the legal basis for and purpose of the processing of personal data?
The basis for processing personal data is the legitimate interest of the company based on customer relationship or other appropriate connection.
The purpose of the processing of personal data is:
- delivery of our products and services
- development of our products and services through product development surveys
- fulfillment of contractual obligations and other undertakings of the company,
- management of customer relations,
- organizing events,
- analyzing and profiling of customer or other data subject,
- electronic direct marketing,
- targeting marketing within the networks of the company and other parties.
We use profiling, cookies and other similar tracking technology to identify the data subjects’ personal profiles, online behavior, consumer habits. We use this information to target marketing and to develop our services. For more information, please see our separate Cookie Policy here.

5. What do we do process
We process the following personal data of the customer or other data subject in connection with the customer register:
- basic information of the data subject such as name*, username and/or other identifier, password
- contact information of the data subject such as email address*, phone number*
- information regarding the company and its contact persons, such as business ID* and names* and contact information of the contact persons; company address*
- possible direct marketing prohibitions and consents
- event participation details and possible information regarding the event, such as food limitations
- information regarding the customer ship and contract, such as information of past and existing contracts and orders, other transaction information
- other possible information collected based on the consent of the data subject (such as newsletter)
Providing the information marked with a star is a prerequisite for our contractual relationship and/or customer relationship. We cannot deliver the product and/or service without the necessary information.

6. From where do we receive information?
We receive data primarily from the following sources from the data subject himself, from credit information agencies, from contact information service providers and from other similar reliable sources.
For the purposes described in this privacy policy, personal data may also be collected and updated from publicly available sources and based on information received from authorities or other third parties within the limits of the applicable laws and regulations. Data updating of this kind is performed manually or by automated means.

7. To whom do we disclose data and do we transfer data outside of EU or EEA?
We disclose data from the register to external parties (partners).
We use subcontractors that process personal data on behalf of and for us.
We transfer personal data outside of EU/EEA:
- Russia, Switzerland, Turkey, China, India, Japan, South-Korea, Thailand, Vietnam, Brazil, USA
We have taken care of suitable safeguards for the transfer. We use standard contractual clauses accepted by EU or Privacy Shield-framework where applicable.
We do not transfer personal data of the EU citizen to outside of EU/EEA.

8. How do we protect the data and how long do we store them?
Only those of our employees, who on behalf of their work are entitled to process customer data, are entitled to use a system containing personal data. Each user has a personal username and password to the system. The information is collected into databases that are protected by firewalls, passwords and other technical measures. The databases and the backup copies of them are in locked premises and can be accessed only by certain pre-designated persons.
We store the personal data for as long as is necessary:
- For as long as required by law
- Until we no longer have a valid reason for keeping it, but in no event longer than 15 years
- Until you request us to stop using it
We regularly assess the need for data retention in light of the applicable legislation. In addition, we take reasonable measures to ensure that the personal data in the register is not incompatible, obsolete or inaccurate considering the purpose of the processing. We rectify or delete such information without delay.

9. What are your rights as a data subject?
As a data subject you have a right to inspect the personal data concerning yourself, which is stored in the register, and a right to require rectification or erasure of the data, provided that the request has a legal basis. You also have a right to withdraw or change your consent.
As a data subject, you have a right, according to EU’s General Data Protection Regulation (applied from 25.5.2018) to object processing or request restricting the processing and lodge a complaint with a supervisory authority responsible for processing personal data.
For specific personal reasons, you also have the right to object to profiling and other processing operations, when the processing of your data is based on our customer relationship with you. In connection with your request, you will need to identify the specific situation, based on which you object to the processing. We can refuse the request of objection only on legal grounds.
As a data subject you have the right to object to processing at any time free of charge, including profiling in so far as it relates to direct marketing.

10. Who can you be in contact with?
All contacts and requests concerning this privacy policy must be submitted in writing or in person to the person mentioned in section two (2).
11. Changes in the Privacy Policy

Should we make amendments to this privacy policy we will place the amended statement on our website, with an indication of the amendment date. If the amendments are significant, we may also inform you about this by other means, for example by sending an email or placing a bulletin on our homepage. We recommend that you regularly visit our webpage and notice possible amendments to this privacy policy. review these privacy protection principles from time to time to ensure you are aware of any amendments made.