



## GDPR Register and Privacy Statement

This is the GDPR-compliant register and privacy statement of Davinor Oy in accordance with the EU General Data Protection Regulation (GDPR).

Prepared on: May 5, 2018

Last updated: September 24, 2025

### 1. Controller

**Davinor Oy, Höyläämötie 18, 00380 Helsinki.**

### 2. Contact Person Responsible for the Register

Ville Hytönen

sales@davinor.com

+358 9 7288 640

### 3. Name of the Register

Email register, sample measurement, delivery, and offer database.

### 4. Legal Basis and Purpose of Personal Data Processing

The legal basis for processing personal data under the EU General Data Protection Regulation is the **legitimate interest** arising from a customer relationship or cooperation (sample measurement or sales collaboration).

Data is used for the **maintenance and development of customer and partner relationships**.

### 5. Data Content of the Register

The register may include the following information:

- Name of the person
- Position
- Company/organization
- Contact details (phone number, email address, postal address)
- Website URLs
- IP address of internet connection
- Social media profiles/accounts
- Information about ordered services and any changes
- Billing information
- Other details related to the customer relationship and ordered services
- In the case of sample measurements, the contact person handling the sample on the customer's behalf

**Note:** Visitors to the website and their IP addresses are only recorded **when they contact Davinor Oy** via the contact form on the website.

**6. The data stored in the register is primarily obtained from customers through:**

- Messages sent via web forms
- Emails
- Phone calls
- Social media platforms
- Contracts
- Customer meetings
- Other occasions where the customer voluntarily provides their data

Information about contact persons of companies and other organizations may also be collected from public sources such as:

- Websites
- Directory services
- Other companies (*Rare!*)

**7. Regular Data Disclosures and Transfer of Data Outside the EU/EEA**

- Data is **not regularly disclosed** to third parties.
- Data is **not transferred** outside the EU or EEA **without the customer's or partner's consent**.  
Often, verbal consent is obtained during customer meetings. Customers or partners are asked whether a reseller from a specific country or region may contact them.  
Data may be processed by Davinor's **resellers**.

**8. Principles of Register Protection**

Data is processed on **Microsoft Windows devices** with:

- Up-to-date system updates
- Firewalls
- Antivirus software

Remote access to data is **only possible for email**.

**9. Right of Access and Right to Request Correction**

Any individual listed in Davinor's register has the right to:

- **Review their stored data**
- **Request correction of incorrect data** or completion of incomplete data

To do this, the person must send a **written request** to the data controller.

The controller may ask the requester to **verify their identity**.

The controller will respond within the timeframe specified in the GDPR, usually via email or as otherwise agreed.

## 10. Other Rights Related to Personal Data Processing

A registered individual has the right to:

- Request the **erasure of their personal data** ("right to be forgotten")
- Exercise **other rights under the GDPR**, such as restricting the processing of personal data in certain situations

Requests must be sent in **writing** to the data controller.

The controller may ask the requester to **verify their identity**.

The controller will respond within the timeframe set by the GDPR (typically within one month).