

PRIVACY NOTICE REGARDING CLIENTS, SUPPLIERS AND OTHER STAKEHOLDERS

Updated on 19 May 2021

1. Data Controller

Clinical Research Institute Helsinki University Central Hospital Ltd (business ID: 0872967-2)
Mannerheimintie 105, PO Box 710, 00029 HUS, Finland

(“Clinical Research Institute HUCH”, “we”, “Data Controller”)

2. Data Controller’s contact person

Minna Aromäki, Financial Manager
Mannerheimintie 105, PO Box 710, 00029 HUS, Finland
[ext-minna.aromaki\[at\]hus.fi](mailto:ext-minna.aromaki[at]hus.fi)

The contact person is responsible for ensuring that Clinical Research Institute HUCH plans and carries out data processing activities in compliance with applicable provisions and decrees and works together with HUS Data Protection Officer.

The Data Protection Officer of HUS acts as the Data Protection Officer:

HUS Keskuskirjaamo
PO Box 200, 00029 HUS, Finland
[eutietosuoja\[at\]hus.fi](mailto:eutietosuoja[at]hus.fi)

3. General

In this privacy notice we will provide information on how we collect and process the personal data of our clients, suppliers and the representatives of our other stakeholders (the “**Data Subjects**”). We will also describe on what grounds and to what extent we process personal data.

The provisions of the generally applicable EU General Data Protection Regulation (2016/679, the “**GDPR**”) and the Finnish Data Protection Act (1050/2018) as well as other applicable special acts (jointly the “**Applicable Legislation**”) apply to the processing of the data subjects’ personal data.

4. Purpose of and legal basis for the processing of personal data

We process personal data especially for the following purposes:

- Provision of services ordered and/or used by you or your organisation and performance of the obligations related thereto;
- Performance of the obligations related to the products and/or services that we have ordered;
- Administration, management and development of client accounts or other partnerships, including correspondence and implementing customer service and communications;
- Organisation of events, such as client events and training seminars,
- Invoicing and payment of invoices;



- Payment of statutory charges;
- Analysis and compilation of statistics for business purposes;
- Development of our services and customer service e.g. on the basis of client satisfaction and feedback surveys;
- Prevention and investigation of misconduct e.g. by way of electronic surveillance or other technical monitoring;
- Fulfilling statutory obligations as well as responding to the authorities' information requests or other requests;
- Marketing and advertising, including target marketing and direct marketing in so far as these are based on Applicable legislation and/or your consent.

The processing of personal data must be based on a legal basis set out in the GDPR. We process personal data on the basis of one or several of the following grounds, depending on the processing activity:

- Concluding an agreement with you or the organisation represented by you or enforcing such agreement;
- Processing of personal data for the purposes of a client relationship or other similar partnership, in which case the processing of personal data is based on our legitimate interest or that of third parties (such as current or future business partners, suppliers or clients), provided that the data subject's fundamental rights and freedoms will not supersede such legitimate interest. Examples of legitimate interests include the administration and development of client relationships or other similar partnerships; other legitimate business purposes, such as the development of our services; and direct marketing;
- Your consent; or
- Mandatory legislation.

In the event that you provide personal data to us on the basis of an agreement concluded between you or the organisation represented by you and us as described in this privacy notice, you are obliged to provide certain personal data for the purposes specified in this privacy notice. It should be noted that a failure to provide personal data can prevent us from performing our contractual obligations or other obligations or undertakings, which may result in a situation where you or the organisation represented by you cannot conclude an agreement or place an order, or where a service that you have ordered cannot be delivered. The aforementioned does not, however, apply to situations where the provision of personal data or certain type of processing of personal data is based on your consent.

5. Personal data we process

We only process personal data that is necessary for the applicable purpose of use. We typically process the following personal data depending on the situation:

- **Basic information**, such as name, contact information (including address, phone number and email address), personal identity code and, if the data subject is the representative of a corporation, information regarding the corporation and the data subject's status and duties in the corporation.
- **Information regarding client relationships or other corresponding business relationships**, such as information regarding agreements, orders and used services,



information regarding invoicing and payments, information regarding correspondence and meetings between us and the data subject, and information regarding direct marketing bans.

- **Information regarding participation in events organised by us**, including the basic information mentioned above and attendance data.

In addition to the personal data referred to above, we may also process certain special categories of personal data, i.e. sensitive data, as follows:

- **Information regarding dietary restrictions** in connection with organising events.

In addition, we may also process information regarding changes made to all of the categories of personal data that are disclosed above.

6. Regular sources of data

We primarily collect personal data from you or from the organisation you represent e.g. at meetings or in connection with concluding agreements, orders or invoicing. As our client or other business relationship progresses and/or in connection with the provision of ordered services, your personal data will be collected from you in other ways as well, such as e.g. during client interactions or when we correspond with you in some other manner via phone or email. We may also collect and update the personal data we collect by contacting public authorities and companies (such as Suomen Asiakastieto Oy) that provide services related to personal data.

7. Regular disclosure of personal data

Based on a separate assignment, we may transfer personal data to third parties that provide us with services, such as IT or software services or other information processing services, for processing purposes. We have concluded a data processing agreement that meets the requirements established in the GDPR with all third parties that process personal data in order to ensure that all personal data is processed in accordance with the law.

The personal data of Data Subjects can also be disclosed to public authorities or to other third parties pursuant to Applicable Legislation or any decisions or orders handed down by a court of law or a public authority that are binding upon us.

Personal data can also be disclosed to the parent company as well as to the receiving organization and its advisors with regard to transferring personnel in connection with a transfer of business that is conducted in accordance with the applicable business transfer provisions.

8. Retention period

How long we retain personal data depends on the nature of the personal data and its purpose of use. We store personal data, at minimum, for the duration that is necessary for implementing the disclosed purposes of use. The retention periods are determined as follows:

- Personal data will be retained for as long as our legitimate interest can justifiably be considered to exist. Whether a legitimate interest exists is determined e.g. based on correspondence between us and the relevant Data Subject. In a typical case, the



retention period that applies to personal data is tied to the validity of an agreement we have concluded with the Data Subject or an organisation represented thereby.

- Personal data may also be subject to statutory retention periods. For example, accounting provisions require for data included in bookkeeping materials to be retained for a period of six years.
- In the event that a Data Subject has withdrawn their consent or opposed the processing of their personal data for specific purposes, we will delete the Data Subject's personal data if there is no other legal basis for the processing thereof or cease processing the relevant data for the specified purposes.

Once the personal data is no longer necessary, it will be destroyed in a manner that ensures the security of the data or irreversibly anonymised.

9. Transfers of data to countries outside the EU or the EEA

In the event that we transfer personal data to a country that is located outside the EU or the EEA, we will ensure that the personal data will be processed in a manner that ensures an adequate level of data protection by concluding agreements or by implementing other appropriate safeguards. You can request additional information on cross-border transfers of personal data and the appropriate safeguards that apply to each specific transfer by contacting the contact person referred to above in section 2.

10. Principles for the protection of personal data

All personal data is processed with the level of care required by the GDPR and all data is protected appropriately. Personal data can be accessed only by persons who require access to the data in order to carry out their work duties.

The physical and digital security of the data that is stored electronically or manually is ensured by limiting access to the data only to those persons who are entitled to process the said data due to the nature of their work duties. These persons are subject to a confidentiality obligation. Digitally processed data is stored in databases that are protected with passwords, firewalls and other technical measures. All manually processed personal data is stored in a locked space to which access is limited. All materials will be destroyed in a manner that ensures the security of the data.

11. Data Subject's Rights

As a Data Subject you have the following rights related to the processing of your personal data under the GDPR:

- The right to obtain information on the processing of your personal data;
- The right to have access to your own information and to review your personal data;
- The right to request rectification of inaccurate or erroneous data and supplementation related thereto;
- The right to request the erasure of your personal data;
- The right to withdraw your consent and object the processing of your personal data to the extent the processing is based on your consent;
- The right to object the processing of your personal data on the grounds of your personal special occasion to the extent your personal data is being processed on the basis of the legitimate interest of the Data Controller;



- The right to receive your personal data in a machine-readable form and to transfer this data to another Data Controller provided that you have personally given this personal data to the Data Controller, the Data Controller processes this personal data on the grounds of an agreement and the consent provided by the Data Subject and processing will be carried out automatically; and
- The right to request restrictions on the processing of your personal data.

You may exercise the above-mentioned rights by sending a written request by mail or email to the contact person referred to in section 2. You may freely draft your own request or submit the enclosed form. If necessary, we may request you to specify your request and confirm your identity before we process your request. As a rule, we provide our answer to your request within one month from the date of accepting the request. Please note that your request cannot necessarily be processed if the GDPR provides grounds for the refusal.

12. The right to file a complaint to the supervisory authority

If you hold that the GDPR has not been complied when processing your personal data you have the right to file a complaint to the supervisory authority in that Member State where you hold a permanent place of residence or work position or where the claimed infringement of rights has occurred.

In Finland, the applicable supervisory authority is the Finnish Data Protection Ombudsman:

The Office of the Finnish Data Protection Ombudsman
PO Box 800, 00531 Helsinki, Finland
[tietosuoja\[at\]om.fi](mailto:tietosuoja[at]om.fi)
<https://tietosuoja.fi>



Please submit the form to:
Clinical Research Institute
HUCH
PO Box 710
00029 HUS, Finland
ext-minna.aromaki[at]hus.fi

With this form, I can execute the rights related to the processing of my personal data.

I wish to: (Please choose one or several options depending on which rights you wish to exercise)

- obtain information on the processing of my personal data;
- have access to my own information and to review my personal data;
- request rectification of inaccurate and/or erroneous data and/or supplementation related thereto;
- request the erasure of my personal data;
- withdraw my consent and object the processing of my personal data to the extent the data processing is based on my consent;
- object the processing of my personal data on the grounds of my personal special occasion to the extent my personal data is being processed on the basis of your legitimate interest;
- request restrictions on the processing of my personal data.

A further specification of how I wish to use my rights and on which my request is based:

By signing this form, I confirm the choice I have made above.

Contact details (used only for the purposes of executing my rights)

Full name:

Street address:

Postal code and post office:

Email:

Place and date:

Signature: