

## **PRIVACY STATEMENT REGARDING RECORDS OF TELEPHONE CALLS AND MEETINGS**

### **1. DATA CONTROLLER**

Tamro Corporation (0533965-2), Rajatorpantie 41 B, FI-01641 Vantaa, Finland

### **2. CONTACT PERSON FOR MATTERS CONCERNING DATA FILES**

Tamro Legal, switchboard +358 20 44511

### **3. NAME OF THE DATA FILE**

*Tamron puhelu- ja kokoustalennerekisteri* (Tamro's telephone call and meeting records register)

### **4. THE PURPOSE AND BASIS FOR PROCESSING PERSONAL DATA**

Personal data is processed for developing customer service and for ensuring its quality. When developing customer service, the records can be used for training customer service personnel, in service level surveys and for developing the instructions. Virtual meetings are recorded for documenting the discussions taking place in Tamro's internal meetings, and in meetings between Tamro and the customer when the discussions concern the implementation of an agreement.

In addition, Tamro may record the telephone calls taking place in internal meetings and briefings. The purpose of these records is to share information internally within Tamro. In these cases, recording is based on Tamro's legitimate interest.

The primary basis for recording data is a customer relationship between the customer and Tamro, the customer's consent, an assignment given by the customer, or other pertinent connection, such as implementing an agreement with a company represented by the customer.

### **5. INFORMATION CONTENT OF THE DATA FILE**

Tamro records all telephone calls to the customer service and those Skype calls where recording is mentioned in their invitation. The entire discussion during the telephone call, including the shared presentations and chat discussions, is recorded.

In addition, the data file contains information related to the processing of data, such as the date of recording and the source of the data. It also contains the name and contact details of the person associated with the call, if Tamro has learned them in connection with participation in the telephone call or meeting.

### **6. PERSONAL DATA RETENTION PERIOD**

Tamro will only retain the data as long as necessary for fulfilling the purpose for which it was collected.

### **7. REGULAR SOURCES OF DATA**

Data is obtained from the customer or from the participant in the call, or from the Tamro employee participating in the call.

## **8. REGULAR DISCLOSURE OF THE DATA AND TRANSFERRING THE DATA OUTSIDE THE EUROPEAN UNION OR THE EUROPEAN ECONOMIC AREA**

The data is disclosed to Tamro's group companies for the purposes described in section 4 of this privacy statement and to potential other Tamro's personal data files, while always observing privacy legislation and acting within the limits imposed therein.

The data is not disclosed to anyone outside Tamro or parties participating in the production, development or maintenance of services and communication on behalf of Tamro, except by agreement, a separate consent and/or specific regulations.

The data is not regularly transferred outside the EU or the European Economic Area. However, some of Tamro's IT services have been outsourced to external service providers who administer and protect servers in which personal data is recorded. In cases where Tamro's service providers use subcontractors located outside the EU or the European Economic Area, it is ensured that the data concerned is protected appropriately and in the manner required by the data protection legislation in force at the time by using model clauses by the EU Commission or by ensuring that the recipient of data is included in the scope of the Privacy Shield system.

## **9. DESCRIPTION OF THE PRINCIPLES OF PROTECTING THE DATA FILE**

Digital material can only be accessed with the personal username of an authorized employee, contractor or business partner. Furthermore, some files are protected by passwords. There are several levels of access rights, and each user is given an access right that is sufficient for their task, while being as limited as possible.

## **10. RIGHTS OF THE DATA SUBJECT CONCERNING THE PROCESSING OF PERSONAL DATA**

### **The data subject's right to access the data (inspection right)**

The data subject is entitled to inspect which data concerning the data subject has been recorded in Tamro's customer data file. The inspection request shall be made in accordance with section 11 of this privacy statement. The inspection right can be denied on grounds specified in the legislation. As a rule, exercising of the inspection right is free of charge.

### **The data subject's right to demand the rectification or erasure of data or the restriction of its use**

The data subject can make a request to rectify their data in accordance with section 11 of this privacy statement.

The data subject also has the right to demand the data controller to restrict the processing of the data subject's personal data, for instance, in a situation where the data subject is waiting for Tamro's response to a request to rectify or erase their data.

### **The data subject's right to transfer the data from one system to another**

To the extent that the data subject has provided data to the customer data file to be processed based on the data subject's consent or assignment, the data subject has the right to obtain such data for their personal use, primarily in machine-readable format, as well as to transfer the data to another data controller.

### **The data subject's right to lodge a complaint to the supervising authority**

The data subject is entitled to lodge a complaint to the competent supervising authority if the data controller has not observed the applicable privacy regulations in its actions.

### **Other rights**

If personal data is processed based on the consent of the data subject, the data subject has the right to withdraw their consent by notifying Tamro of this in accordance with section 11 of this privacy statement.

The data subject can give Tamro a consent to direct marketing or prohibit it.

## **11. CONTACTS**

In all questions related to the processing of personal data and in situations related to the exercising of one's rights, the data subject shall contact Tamro by sending an e-mail to [asiakaspalvelu@tamro.com](mailto:asiakaspalvelu@tamro.com), at Tamro's office or by post, using the address: Tamro Corporation / Data Protection Officer, Rajatorpantie 41 B, 01641 Vantaa, Finland. If necessary, Tamro may request the data subjects to further clarify their request in writing, and the identity of the data subject may be verified before taking any other action.