# 1. DATA CONTROLLER

### FINLAND:

3 Step IT Group Oy Business ID 2087590-4 Mechelininkatu 1a 00180 Helsinki Finland

which is the parent company of 3 Step IT group, and one or several of the following subsidiaries together (hereinafter referred to as ("3 Step IT"), whichever in each is applicable:

Last updated: 2019-10-01

### **FINLAND:**

3 Step IT Oy Business ID 2161942-7 Mechelininkatu 1a 00180 Helsinki Finland

### **DENMARK:**

3 Step IT A/S Business ID 26106427 Vandtårnsvej 62, 2860 Søborg Denmark

## **NORWAY:**

3 Step IT AS Business ID 878703812 Wergelandsveien 7 0167 Oslo Norway

### SWEDEN:

3 Step IT Sweden AB Business ID 556488-0218 Box 1556 581 15 Linköping Sweden

AddPro Finans AB Business ID 556861-4357 Box 1566 58115 Linköping

Advania Finance AB Business ID 556737-7840 Box 1566 58115 Linköping

### **ESTONIA:**

3 Step IT OÜ Business ID 10731756 Narva mnt 7d, Tallinn 10117 Estonia

### LATVIA:

3 Step IT SIA
Business ID 40003717838
Vilandes iela 3
LV-1010, Riga
Latvia

# **DATA REGISTER DESCRIPTION: Marketing register** Last updated: 2019-10-01 LITHUANIA: UAB 3Step IT Business ID 300059934 Juozo Balčikonio g. 9, LT-08247 Vilnius Lithuania

2.	CONTACT PERSON IN MATTERS REGARDING DATA REGISTER	Data Protection Office 3 Step IT Group Oy dpo(at)3stepit.com
3.	NAME OF DATA REGISTER	Marketing register
4.	PURPOSE OF AND LEGAL GROUNDS FOR PROCESSING OF PERSONAL DATA	The purpose of processing of personal data included in the register is:  - communication, advertising and marketing; and - statistical purposes  Processing of personal data included in this register is based on the legitimate interests pursued by the controller defined in point (f) of Article 6(1) of General Data Protection Regulation (EU) 2016/679. The legitimate interest of the data controller is pursuing direct marketing by i.e. conducting communications and delivering messages to the data subject.
5.	DATA CONTENT OF REGISTER	<ul> <li>contact details and other data that data subjects give via 3 Step IT website, email correspondence, and occasionally in other ways, such as by attending to webinars or seminars or other events</li> <li>data received from use of 3 Step IT website, e.g. cookies sent to device used in visiting the website</li> <li>data from public sources, e.g. job title from LinkedIn</li> </ul>
6.	REGULAR SOURCES OF DATA	<ul> <li>information provided by the data subject by contact form, email correspondence or other communication</li> <li>website analytics</li> <li>public sources</li> </ul> The data subject is not obliged to provide personal data and there are no consequences of failure to provide such data. Notwithstanding, provision of personal data described above may be a prerequisite for participation to certain events and communication related to such matters.
7.	REGULAR TRANSFERS OF DATA OR TRANSFERS OUTSIDE THE EU OR EUROPEAN ECONOMIC AREA	Data may be transferred to entities within 3 Step IT Group, which are located outside the EU and the EEA in Singapore and Malaysia, for the purposes defined above. These transfers are performed using standard data protection clauses adopted by the Commission as defined in point (c) of Article 46(2) of General Data Protection Regulation (EU) 2016/679.  Data may also be transferred to third party service providers outside 3 Step IT Group and within EU/EE area for the purposes defined above. Transfers outside EU/EE area are performed using standard data protection clauses adopted by the Commission as defined in point (c) of Article 46(2) of General Data Protection Regulation (EU) 2016/679.
8.	STORAGE PERIOD	The personal data will be retained as long as required by applicable laws and regulations.

Last updated: 2019-10-01

# **DATA REGISTER DESCRIPTION: Marketing register**

OF THE DATA REGISTER  Soliwate and other generally applied security measures. Only pre-designated employees of 3 Step IT have access to the personal data contained in the data register.	THE PROTECTION OF THE DATA	
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Last updated: 2019-10-01

Additional information about 3 Step IT's data processing principles can be found in 3 Step IT's Privacy Policy, which is available at: <a href="https://www.3stepit.com/content/privacy-and-cookies-policy-2">https://www.3stepit.com/content/privacy-and-cookies-policy-2</a>