

<p>1. DATA CONTROLLER</p>	<p>FINLAND: 3Step IT Group Oy Business ID 2087590-4 Mechelininkatu 1a 00180 Helsinki Finland</p> <p>which is the parent company of 3 Step IT group, and one or several of the following subsidiaries together (hereinafter referred to as “3stepIT”), whichever in each customer relationship is applicable:</p> <p>FINLAND: 3 Step IT Oy Business ID 2161942-7 Mechelininkatu 1a 00180 Helsinki Finland</p> <p>DENMARK: 3 Step IT A/S Business ID 26106427 Vandtårnsvej 62 2860 Søborg Denmark</p> <p>NORWAY: 3 Step IT AS Business ID 878703812 Wergelandsveien 7 0167 Oslo Norway</p> <p>SWEDEN: 3 Step IT Sweden AB Business ID 556488-0218 Box 1556 581 15 Linköping Sweden</p> <p>3 Step IT Trading AB Business ID 559267-1738 Drottninggatan 19 582 25 Linköping Sweden</p> <p>AddPro Finans AB Business ID 556861-4357 Box 1566 58115 Linköping Sweden</p> <p>Advania Finance AB Business ID 556737-7840 Box 1566 58115 Linköping Sweden</p> <p>ESTONIA: 3 Step IT OÜ Business ID 10731756 Narva mnt 7d Tallinn 10117 Estonia</p> <p>LATVIA: 3 Step IT SIA Business ID 40003717838</p>
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LV-1010, Riga
Latvia

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	Customer and marketing register
4. PURPOSE OF AND LEGAL GROUNDS FOR PROCESSING OF PERSONAL DATA	<p>The purpose of processing of personal data included in the customer register is:</p> <ul style="list-style-type: none"> - to provide and deliver the services and products to the customers; - communication with the customer; - fulfilment of any other obligation towards customers; - to develop and manage the customer relationship; - to the extent permitted by applicable laws, advertising and marketing and statistical purposes; - communication, advertising and marketing; and - statistical purposes. <p>Processing of personal data included in this register is based on:</p> <p>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 managing and developing the contractual relationship with its customer, pursuing its obligations within such contractual relationship by i.a. conducting communications and delivering messages to the data subject, and pursuing direct marketing by i.e. conducting communications and delivering messages to the data subject.</p> <p>The purpose and data content regarding personal data collected in relation to Know Your Customer (KYC) obligations is described separately in Customer identification register (KYC/CDD).</p>
5. DATA CONTENT OF REGISTER	<p>CUSTOMER DATA (Existing customers):</p> <p>The types of personal data collected:</p> <ul style="list-style-type: none"> - Name, address and contact information of the customer or contact persons, representatives and/or decision-makers of the customer. - Register may also contain other personal data relating to data subject's attendance to 3 Step IT's marketing or other events and general information of data subject's areas of interest. <p>The categories of data subjects:</p> <p>Representatives of the customer, members of customers management, customers owners</p> <p>MARKETING DATA (Prospects):</p> <p>The types of personal data collected:</p> <ul style="list-style-type: none"> - 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 - data received from use of 3 Step IT website, e.g. cookies sent to device used in visiting the website - data from public sources, e.g. job title from LinkedIn <p>The categories of data subjects:</p>

	Representatives of the customers or prospect customers, members of customers or prospect customers management, customers or prospect customers owners.
6. REGULAR SOURCES OF DATA	<ul style="list-style-type: none"> - Information provided by the customer, prospect customer or the data subject by contact form, email correspondence or other communication - Website analytics - Public sources <p>CUSTOMER DATA: Provision of the personal data is a requirement necessary to enter into a contract with the customer or to pursue such customer relationship. The data subject is not obliged to provide personal data, however, provision of personal data might be a prerequisite for using of 3stepIT's services or products.</p> <p>MARKETING DATA: 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.</p>
7. REGULAR TRANSFERS OF DATA OR TRANSFERS OUTSIDE THE EU OR EUROPEAN ECONOMIC AREA	<p>CUSTOMER DATA: Data may be transferred to entities within 3stepIT group for the purposes defined above. In this case, personal data will not be transferred outside EU/EEA, except for the UK. Transfers to the UK are performed based on a decision of the European Commission on the adequacy of data protection.</p> <p>MARKETING DATA: Data may be transferred to entities within 3stepIT group for the purposes defined above. In this case, personal data will not be transferred outside EU/EEA, except for the UK. Transfers to the UK are performed based on a decision of the European Commission on the adequacy of data protection.</p> <p>Data may also be transferred to third party service providers for the purposes defined above. If these entities are located outside the EU/EEA, the transfers shall be done using the appropriate safeguards defined in Article 46 of General Data Protection Regulation (EU) 2016/679.</p>
8. STORAGE PERIOD	<p>CUSTOMER DATA: The personal data will be retained in the register as long as the contractual relationship with the customer lasts.</p> <p>Currently the retention period is for the duration of customer relationship and five (5) years thereafter.</p> <p>MARKETING DATA: The personal data will be retained as long as required by applicable laws and regulations.</p>
9. PRINCIPLES FOR THE PROTECTION OF THE DATA REGISTER	3stepIT's information systems are protected by passwords, firewalls, anti-virus software and other generally applied security measures. Only pre-designated employees of 3stepIT have access to the personal data contained in the data register.

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