

1. DATA CONTROLLER	<p>3Step IT Group Oy Business ID 2087590-4 Mechelininkatu 1a 00180 Helsinki Finland</p> <p>and one or several of the following together, whichever in each customer relationship is applicable:</p> <p>3Step IT Oy Business ID 2161942-7 Mechelininkatu 1a 00180 Helsinki Finland</p> <p>3Step IT A/S Business ID 26106427 Vandtårnsvej 62, 2860 Søborg Denmark</p> <p>3 Step IT AS Business ID 878703812 Wergelandsveien 7 0167 Oslo Norway</p> <p>3 Step IT Sweden AB Business ID 556488-0218 Box 1556 581 15 Linköping Sweden</p> <p>3Step IT OÜ Business ID 10731756 Narva mnt 7d, Tallinn 10117 Estonia</p> <p>3Step IT SIA Business ID 40003717838 Vilandes iela 3 LV-1010, Riga Latvia</p> <p>UAB 3Step IT Business ID 300059934 Labdarių g. 5, LT-01120 Vilnius Lithuania</p> <p>3 Step IT (UK) Limited Business ID 5476079 Building 329, Doncastle Road Bracknell, Berks RG12 8PE United Kingdom</p>
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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 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 <p>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 managing and developing the contractual relationship with its customer and pursuing its obligations within such contractual relationship by i.a. conducting communications and delivering messages to the data subject.</p>
5. DATA CONTENT OF REGISTER	<ul style="list-style-type: none"> - Name and contact information of contact persons and decision-makers of customers. - User names and log data of data subjects in Asset Management NG web-based portal. - Register may also contain other personal data relating to data subject's attendance to data controller's marketing or other events and general information of data subject's areas of interest. <p>The personal data shall be retained in the register as long as the contractual relationship with the customer lasts.</p>
6. REGULAR SOURCES OF DATA	<ul style="list-style-type: none"> - Information provided by the customer or the data subject - Use of Asset Management NG portal - Public sources <p>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 3 Step IT's services or products.</p>
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

	<p>the Commission as defined in point (c) of Article 46(2) of General Data Protection Regulation (EU) 2016/679.</p> <p>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.</p>
<p>8. PRINCIPLES FOR THE PROTECTION OF THE DATA REGISTER</p>	<p>The data register is protected with passwords and the general principles of data protection related to the information systems of 3 Step IT Group, its partners and affiliates, such as firewalls. Only pre-designated employees of 3 Step IT Group, its partners and affiliates have access to the personal data contained in the data register.</p>

Additional information on and general principles regarding processing of personal data within 3 Step IT are described in 3 Step IT's Privacy Policy, which is available at:

<https://www.3stepit.com/content/privacy-and-cookies-policy-2>