

<p>1. DATA CONTROLLER</p>	<p>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 "3 Step IT"), 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>AddPro Finans AB Business ID 556861-4357 Box 1566 58115 Linköping</p> <p>Advania Finance AB Business ID 556737-7840 Box 1566 58115 Linköping</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 Vilandes iela 3 LV-1010, Riga Latvia</p> <p>LITHUANIA: UAB 3Step IT Business ID 300059934 Juozo Balčikonio g. 9 LT-08247 Vilnius Lithuania</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:</p> <ul style="list-style-type: none"> - <u>(with respect to collecting customer's contact details)</u> the legitimate interests pursued by 3 Step IT (General Data Protection Regulation (EU) 2016/679, Article 6(1) subsection (f)). 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>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>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>Customers, representatives of the customer, members of customers management, customers owners</p>
6. REGULAR SOURCES OF DATA	<ul style="list-style-type: none"> - Information provided by the customer or the data subject - 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	<p>Data may be transferred to entities within 3 Step IT group for the purposes defined above.</p> <p>Personal data will not be transferred outside EU/EEA.</p>

OR EUROPEAN ECONOMIC AREA	
8. STORAGE PERIOD	<p>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 years thereafter.</p>
9. PRINCIPLES FOR THE PROTECTION OF THE DATA REGISTER	<p>3 Step IT's information systems are protected by passwords, firewalls, anti-virus software 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.</p>

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