

1. DATA CONTROLLER	<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, whichever in each customer relationship is applicable:</p> <p>FINLAND: 3Step IT Oy Business ID 2161942-7 Mechelininkatu 1a 00180 Helsinki Finland</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>UNITED KINGDOM: 3 Step IT (UK) Limited Business ID 5476079 Building 329, Doncastle Road Bracknell, Berks RG12 8PE United Kingdom</p>
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	Remarketing customer register
4. PURPOSE OF AND LEGAL GROUNDS FOR PROCESSING OF PERSONAL DATA	The purpose of processing of personal data included in the register is: <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 - ensuring compliance with possible legal or contractual requirements, e.g. investigations against EU/UN and US financial sanctions lists

	<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)). <p>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> <ul style="list-style-type: none"> - <u>(with respect to European Union / United Nations financial sanctions)</u> necessity for compliance with a legal obligation to which 3 Step IT is subject (General Data Protection Regulation (EU) 2016/679, Article 6(1) subsection (c)); and - <u>(with respect to United States financial sanctions)</u> the consent given by the data subject (General Data Protection Regulation (EU) 2016/679, Article 6(1) subsection (a)) and the legitimate interests pursued by 3 Step IT (General Data Protection Regulation (EU) 2016/679, Article 6(1) subsection (f)). <p>The legitimate interest of the data controller is compliance with financial sanctions imposed by United States which 3 Step IT has contractually undertaken to comply with.</p>
<p>5. DATA CONTENT OF REGISTER</p>	<ul style="list-style-type: none"> - Name, date of birth, nationality, address and contact information of the customer or contact persons and/or decision-makers of the customer. - Name, date of birth, nationality and address of representatives and board members and owners of customers.
<p>6. REGULAR SOURCES OF DATA</p>	<ul style="list-style-type: none"> - Information provided by the customer or the data subject - Public sources, such as OFAC Sanctions Lists <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>
<p>7. REGULAR TRANSFERS OF DATA OR TRANSFERS OUTSIDE THE EU OR EUROPEAN ECONOMIC AREA</p>	<p>Customer's contact details 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.</p>

	Personal data related to financial sanctions investigations will not be transferred outside EU/EEA.
8. RETENTION TIME	The personal data will be retained by 3 Step IT for the duration of customer relationship and five years thereafter. Personal data related to financial sanctions investigations will be retained ten years after each transaction.
9. PRINCIPLES FOR THE PROTECTION OF THE DATA REGISTER	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.

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>