

DESCRIPTION OF THE FILE
Personal Data Act (523/1999) section 10

Date of drafting: 24.5.2017

Use an enclosure if necessary.

1. Controller	Name Webropol Oy
	Contact information (address, tel. etc...) Huovitie 3, 00400 Helsinki FINLAND
2. The person in charge and/or contact person	Name Ali Toivola Chief Information Security Officer
	Contact information (address, tel. etc...) Phone. 020 155 2155 E-mail: ali.toivola@webropol.com
3. Name of the register (should describe the content)	Customer and user register of Webropol Oy
4. The purpose for processing the personal data / the purpose for the use of a register (If the processing of personal data is outsourced [external service providers are used for the processing], a mention about it can be included to this point)	Collected user data is used for managing and improving customer contacts as required by the Webropol service. The data will be used for business development purposes and, if legally required, for providing information to relevant authorities.

[Unofficial translation]

<p>5. Content of the register</p> <p>(For instance: name, address and telephone number of the data subject)</p>	<p>The register contains</p> <ul style="list-style-type: none"> - Name, address, email of user - Customer name - Business ID - Date of becoming customer - Customer business sector and size - Relevant information for maintaining customer relations - Department name - Position in customer organisation - Service records
<p>6. Regular sources of information *</p> <p>(Which data is received, by whom and on what ground. For instance: consent or provision of a law)</p>	<p>User data is collected from the registered users of Webropol service with their consent. Prospect information can be bought.</p>
<p>7. Regular destinations of disclosed data and whether the data is transferred to countries outside the the European Union or the European Economic Area</p>	<p>Data will be disclosed only to</p> <ul style="list-style-type: none"> - relevant authorities if legally required - subsidiaries of Webropol Oy if legally permitted <p>Data will not be disclosed outside of European Union.</p>
<p>8. The principles how the data file/register is secured.</p>	<p>A. Manual register (place of storage and the methods of protection)</p> <p>Any manually received material (contracts etc) will be stored in locked environment. This information is accessible only to persons with given privileges for handling this data.</p>

	<p>B. Data register/ADP register (principles for the right to use a register, monitoring of the use and actual protection of hardware)</p> <p>Only assigned employees of Webropol Oy and possible sub contractors have the right to access the register. Each employee has signed a valid non-disclosure agreement.</p> <p>Each user has personal user name and password to access the data, and the data is protected according the Webropol data protection policies.</p>
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* Section 10 of the Personal Data Act does not require to make a note of this information, but it's recommendable to do so, regarding the right of access of the data subjects. Furthermore, it also describes the content of the register.

OFFICE OF THE DATA PROTECTION OMBUDSMAN

MODEL FORM

25 November 2004

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[Unofficial translation]