

PRIVACY POLICY STATEMENT

1 Controller

Keksi Agency Oy ("Keksi")

Business ID: 2519402-4

Address: Mannerheimintie 142, 00270 Helsinki, Finland

2 Contact person

Jenni-Justiina Niemi

jenni@keksiagency.fi

3 What kind of personal data do we process?

We process information included in the following categories of personal data and amendments thereto, in the contexts of:

3.1 Information concerning orders and customer relationships

- First name and last name
- Contact information (postal address, email address, telephone number)
- The contents of your orders, including photographs, the tracking details of your orders and order history data
- Information compiled in the model bank (contact details, photographs, size details, characteristics, your previous experience and the tax card and banking details saved for the payment of model fees)
- Complaints, feedback and other contacts related to the customer relationship, communications and measures, including phone call recordings and activities relating to the registered controller in social media services
- Information concerning the use of other Keksi services, including information on newsletter subscriptions
- Direct marketing permissions and bans
- Marketing measures targeted at you and their use, information of whether you have opened our newsletters

3.2 Automatically compiled information about the use of Keksi websites

In addition to the above personal data we collect from you, we process your personal data when you visit our website, even if you have not registered as our client or logged into our service. When you go to our website (www.keksiagency.fi), we will process your following personal data with the help of cookies, Facebook pixels and other such technologies:

- Data concerning your online device and online activity (e.g. IP address, browser type and browsing history)
- The time of browsing and duration of session
- The links or ads you click and the ads or other contents you have viewed
- Information derived and profiled by means of analytics and tracking technologies

Personal data can also be combined with data collected through other services.

4 Do I have to provide information?

We need your personal data collected in connection with orders in order to deliver the orders. In addition, the processing of certain personal data, such as data relating to complaints and direct marketing permissions, is based on our statutory obligations.

If you do not disclose certain personal data, the result may be that we cannot deliver your order or conclude an agreement with you on selling our products, that is, we cannot sell our products to you.

5 How is your personal data collected?

We collect your personal data particularly from yourself as you provide data when conducting business with us. For instance you give us data about yourself when placing an order. We also collect personal data in connection with campaigns and customer service situations and whenever you order our newsletter.

We collect personal data from and update it using also the registers of the Population Register Centre, Suomen Asiakastieto Oy and other companies or authorities providing address, updating and other similar services.

In addition, we collect your personal data through the online devices you use, with the help of cookies or similar technologies.

6 For which purposes is your personal data collected and processed?

6.1 Client management and service provision

We process your personal data when managing, administering and developing client relations. We need your personal data in order to provide our services, such as deliver your orders.

In addition, we process your data in order to handle complaints, errors and other disruptions.

6.2 Client communications, marketing and profiling

We process personal data also to implement client communications and when delivering order and delivery confirmations, and in the related communications. Moreover, we use your personal data for the purposes of direct marketing and other marketing by Keksi, and market and opinion surveys, including electronic direct marketing.

In order to offer interesting contents, we can target our marketing communications by analysing and profiling the data processed in our register, such as order data and service user data. We do not make automatic decisions through profiling or otherwise.

6.3 Service development

We also process personal data when analysing and developing our services and other business, and for statistical purposes.

Furthermore, we process personal data in the prevention and investigation of any misuse.

7 What is the legal basis of processing?

7.1 Legitimate interests

Our right to process your personal data is mainly based on the legitimate interests created by the client relationship. We process your information for instance in order to provide services, send marketing messages and sell our products, as necessary to perform these measures. We also process your personal data to create profiles and to send marketing based on legitimate interests.

We have assessed, in the manner required by data protection legislation and instructions by the authorities, that your interests, basic rights or freedoms do not override our legitimate interests to process your personal data in the way described in this privacy policy statement. If you wish, you may exercise your rights described in points 11 and 12 of this statement, should you wish to object to or restrict the processing of personal data by us.

7.2 Contract

We will process your personal data also in order to facilitate the performance of the contract concluded between you and us, and to perform the measures preceding the conclusion of the contract at your request. A contract is concluded between the party you represent, and Keksi, when you approve our delivery terms and order our services.

7.3 Consent

We process your personal data based on consent, insofar that we request your consent to send electronic direct marketing. We also process your personal data collected through cookies and other tracking technologies based on the consent for placing cookies.

You have the right to withdraw your consent to personal data processing any time by contacting the contact person specified in point 2 or, for electronic direct marketing, the link in marketing messages.

7.4 Statutory obligation

We process your personal data in order to comply with our statutory obligations when we process your data to comply with bookkeeping obligations or disclose data to the authorities.

8 Which parties do we transfer or disclose personal data to?

We disclose personal data within the limits permitted and obligated by legislation in force at each time. If necessary, we will disclose personal data also to parties who have a statutory right to access the data, such as competent authorities.

We transfer personal data to IT service providers, accounting agencies and other service providers in order to store and process data in accordance with our instructions, for the purposes defined by Keksi and on behalf of us.

9 Transfer of personal data to a third country

We will not transfer your personal data outside the European Union or European Economic Area.

10 How long do we store your personal data?

We will store personal data if it is necessary for the purposes of personal data processing or to comply with our contractual and statutory obligations.

- We will store order details and information collected in connection with customer service for ten (10) years from the end of the calendar year in which you conducted business with us for the last time, placed an order or contacted customer service.
- We will store all personal data necessary in order to comply with our bookkeeping obligations for ten (10) years from the end of the accounting period in which the information was collected.
- If you have subscribed to our newsletter, we will store your personal data for as long as the newsletter subscription remains valid. If you cancel your newsletter subscription, that is, cancel your consent to receiving electronic direct marketing, we will stop delivering the newsletter to you without undue delay, but will store information on the marketing ban after the cancellation for as long as your personal data is processed for other purposes.
- We will store your personal data collected through cookies and other tracking technologies for two (2) years.

11 Rights of data subjects: How can you influence the processing of your personal data?

Data protection legislation guarantees you certain rights, which are specified below. These rights strengthen the protection of your privacy and enable you to control the processing of your personal data.

We will deliver to you, without undue delay and at the latest within one month from your contact, information about the measures we have undertaken as result of requests relating to the enforcement of your rights.

If you present several requests or if your request is particularly complex, we may extend the deadline for response by up to two (2) months, if necessary. We will inform you separately of any such delay.

You may present the request concerning a right described in this point 11 to the contact person, mentioned in point 2 of this statement, by post or email.

Please note that we may request you to provide further information as needed, necessary in order to confirm your identity.

11.1 Right of access to information

You have the right to obtain from us confirmation as to whether we process personal data concerning you. In addition, you have right of access to the personal data concerning you and the right to receive information on personal data processing in compliance with the General Data Protection Regulation.

When you exercise your right of access to information, we will deliver a copy of your personal data processed by us. If you make the request by electronic means, we will provide the information in a commonly used electronic form, unless you specifically request another method of delivery, which we can reasonably implement.

We may charge a reasonable fee based on administrative costs if you request further copies or make repeated requests.

We cannot provide you information that could reveal trade secrets or violate the rights or freedoms of another person. For example, despite your request, we will not disclose the personal data of other persons.

11.2 Right to rectification

You have the right to request us to rectify any inaccurate and erroneous personal data concerning you, without undue delay. You also have the right to have incomplete personal data completed by means of providing a supplementary statement to us.

11.3 Right to erasure

You have the right to request us to erase personal data concerning you, without undue delay, if

- the personal data is no longer necessary for the purposes for which it was collected or otherwise processed (for instance, if your personal data is no longer necessary for the purposes of client management or another similar purpose);
- you object to the processing of your personal data on grounds relating to your particular situation and there are no legitimate grounds for the processing;
- you object to the processing of your personal data for direct marketing purposes;
- we have unlawfully processed your personal data; or
- your personal data must be erased in order to comply with a legal obligation to which we are subject.

11.4 Right to restriction of processing

You have the right to restrict the processing of personal data so that such personal data shall, with the exception of storage, only be processed with your specific consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another person, if

- you contest the accuracy of your personal data. In this case, processing is restricted for a period enabling the controller to verify the accuracy of the data;
- the processing of your personal data is unlawful, but you oppose the erasure of your personal data and request the restriction of its use instead;
- we no longer need your personal data for the purposes of the processing specified in point 6 of this statement, but you need it for the establishment, exercise or defence of a legal claim; or
- you have objected to the processing of your personal data on grounds relating to your particular situation and you are waiting for verification of whether our legitimate grounds override those of your objection.

11.5 Right to data portability

Insofar as you have provided your personal data to us, you have the right to receive that personal data in a structured, commonly used and machine-readable format and have the right to transmit that data to another controller, insofar as we have processed your personal data by automated means and the processing is based either on your consent (for instance with regard to electronic direct marketing) or the processing of your personal data is necessary in order to facilitate the performance of a contract, such as an order made by you.

The right to data portability is restricted to a procedure which will not adversely affect the rights and freedoms of others. You have no right to data portability if the personal data in question is processed based on our legitimate interests.

12 Right to object

You have the right to object to the processing of your personal data on grounds relating to your particular situation, unless there are legitimate grounds for the processing and the processing is based on our legitimate interests.

In addition, you always have the right to object to the processing of your personal data for direct marketing purposes. Where the data subject has exercised the right to object, direct marketing or processing of personal data for direct marketing purposes may no longer take place.

13 Right to lodge a complaint with a supervisory authority

You have the right to lodge a complaint with a competent supervisory authority – in Finland, the Data Protection Ombudsman – if you consider that your rights based on data protection legislation and the General Data Protection Regulation in particular have been infringed as a result of the processing of your personal data.

14 How do we ensure the security of your personal data?

The appropriate protection of personal data is extremely important to us. We collect the data in databases protected by means of firewalls, passwords and other technical methods. The databases and their backup copies are kept in locked and guarded premises and only certain designated persons have access to the data.

We ensure, through contractual methods, that the partner processing personal data on our behalf is committed to the protection of personal data also with regard to actions of their employees.

Material in manual format is stored in locked premises used by Keksi.

15 Cookies

On our website (www.keksiagency.fi), we use cookies, Facebook pixels and other such technologies in order to provide the best possible service for our clients. Cookies are small text files that can be placed on your device when you visit our website. We use cookies to facilitate the functionalities of our web service, including logging in and the shopping basket feature. Cookies improve the browsing and user experience of our website, making it easier and faster.

Through cookies, we collect information about the terminal devices you use and your conduct in our service, including from which site you entered our service, which browser you use or when and which section of the service you browsed. We use this information for instance to enhance the user comfort of our web service, to analyse visitor data, for customer surveys, personification of contents and targeting of communications and marketing, as well as advertising management. In order to specify products that may interest you, we may collect information about the pages you open or products you purchase, to enable us to market the appropriate services to you. Facebook pixels enable us to target interesting marketing to you in Facebook.

You have the possibility to prevent the use of cookies at any time, completely or partially, by altering your browser settings. Should you wish, you can also erase previously saved cookies. Please note, however, that preventing the use of cookies may influence the use of parts or functions of our website and services, or even prevent this completely.

16 Amendments to this privacy policy statement

We may amend our data protection practices from time to time for instance based on our operating methods or changes in legislation and interpretation practices. We recommend that you familiarise yourself with our data protection information on a regular basis in order to gain comprehensive information on any changes made.

Whenever we change our data protection practices, we inform about the changes on our website.