

## JFP Executive Search Oy's Privacy Policy

*JFP Executive Search Oy's Privacy Policy in accordance with the Law on Personal Data (523/1999) 10§ and 24§, as well as the EU's General Data Protection Regulation, that became enforceable May 25th, 2018.*

### Controller

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### Name of the register

JFP Executive Search Oy Partner Database

### Purpose of the register and processing personal data

On the consent of a registered person, JFP Executive Search Oy (hereinafter referred to as "JFP") collects information about clients, partners and service providers (hereinafter referred to as "Partner") that is relevant for the business, providing services and executing search assignments. The data collection is related to JFP's legitimate interest to provide services and implement contracts, as well as to some legal regulations regarding for example bookkeeping. The aim with collecting the data is to manage, analyze, develop and collect data about client relationships relevant for the business. With the data JFP strives to find professionals matching the client's individual demands and needs. Examples of relevant data is listed below and is related to potential and existing client companies and their representatives.

### Content of the register

The database contents information about the registered, which s/he has provided to JFP. The database can include the following information:

- Name
- Contact information, such as address, e-mail address, phone number
- Position and job description
- Customer feedback
- Dates and notes about possible interactions and meetings
- Companies' contact information and publicly available information
- Other relevant data for executing assignments

## Regular sources of information

JFP collects data about Partners mainly from the Partners' representatives themselves in different context, for example by phone, e-mail, during meetings or when signing contracts, or in other similar situations. Moreover, JFP can collect information also from legally operating third-party information providers.

## Regular disclosure of data

JFP can disclosure data to third parties, when exploiting third-party service providers that provide JFP with financial, legal and IT related services. Personal data might also be exposed to authorities, if required by law. JFP does not disclosure data to third parties without a weighing reason. All JFP's Partners also follow the Finnish Law on Personal Data, as well as the EU's General Data Protection Regulation. Information is not moved outside the European Union or the European Economic Area.

## Register protection principles

All personal data is kept strictly confidential. The data is collected in an electronic database, which is protected by firewalls, passwords, and other technical measures. Access to the system requires a personal username and password, which each user has. The server with the database is held by a service provider in locked and secured premises and are available only for specific assigned employees.

The Partner's data is held for a necessary amount of time, unless the law obliges JFP to keep the data for longer, for example for accounting or reporting issues. The time and criteria for holding the data varies depending on Partner specific needs and intentions. Contract related documents are mainly retained for ten (10) years due to legal obligations and responsibilities, unless there are grounds for keeping the information for longer in JFP's binding law for or its enforcing rights. The retention of personal data of the Partner's representatives depends on how long the person acts as a representative towards JFP.

## The rights of the registered

### *Data inspection*

According to personal data protection regulations and the Finnish law, the registered has the right to inspect, what data is held in the database. The inspection request must be sent written and signed to the Managing Partner of JFP Executive Search Oy.

### *Rectification of incorrect data*

The registered has the right get the incorrect, unnecessary, incomplete or outdated personal data corrected in the registry, without undue delay.

### *Other rights*

The registered has the right to decline the collector to process data for direct advertising, distance sales or other direct marketing, as well as market and opinion polls.