# Data Protection Record of Suomen Lääkevarmennus Oy's Customer and User Data Filing System

#### General

Suomen Lääkevarmennus Oy (later "Company" or "We") is committed to ensure the confidentiality and data protection of personal data at its possession. This data protection record is applied to personal data that We collect in relation to our customer and user data filing system (later "Data Filing System"). The personal data and related processing are described in this data protection record. Additional information regarding the processing of personal data in the Data Filing System is provided by our contact person Maija Gohlke-Kokkonen, info@fimvo.fi.

We may update this data protection record from time to time, for example due to changes in applicable legislation. We endeavor to carry out reasonable means to inform you of any possible changes and their effects in due time beforehand. Therefore, We advise you to review this data protection record always after becoming aware of changes regarding the data protection record. This data protection record was last updated on 25.6.2020.

#### Controller

Name: Suomen Lääkevarmennus Oy

Address: c/o Lääketeollisuus ry

Porkkalankatu 1 00180 Helsinki

Tel: +358 9 6150 4912

Business ID: 2801478-9

#### Whose personal data do We collect?

We process the personal data of the customers and user organizations' representatives (later also "You") of the medicines verification system managed by us.

#### What categories of personal data do We process?

We process the following categories of Your personal data in the Data Filing System:

- Your name;
- Your phone number and e-mail address; and
- the company You are representing and Your position in the company.

#### Which sources do We use to collect personal data?

We collect personal data primarily from the data subjects themselves and from the customer agreements between the Company and the company represented by the data subject.

# Basis for, purposes and impacts of processing Your personal data

The basis for processing Your personal data is *our legitimate interest* based on our purposes of use determined below.

The purpose of the processing of Your personal data is the management and maintenance of the customer relationship between us and the company You are representing. By processing Your personal data, We are able to provide better services for You. The processing of Your personal data will have no other impact on You.

We do not further process Your personal data for other purposes than those described in this data protection record.

# Regular disclosures and transfers of Your personal data to third parties

Your personal data may be transferred to our business partners and subcontractors. Currently, our business partners are Visma Oy, Liana Technologies and Microsoft.

Our business partners may process Your personal data only for managing and maintaining customer relationships on our behalf. We always ensure that our partners do not process the personal data transferred to them for any other purposes.

We may also be required to share Your personal data with competent authorities in accordance with legislation concerning the processing of personal data.

# Transfers of Your personal data outside the EU or European Economic Area

Your personal data is not transferred outside the Finnish Medicines Verification Organisation.

Your personal data is not transferred outside the EU or European Economic Area.

#### Principles for retention of Your personal data

We retain Your personal data in the Data Filing System for as long as the customer relationship exists. After the termination of the customer relationship, Your personal data shall be retained for a maximum of one (1) year following the termination of the customer relationship. Please note that Your personal data may be retained longer if applicable legislation or our contractual obligations towards third parties require a longer retention period.

# Rights of a data subject in relation to the processing of personal data

As a data subject, You have the right, at any time, according to applicable data protection legislation, to:

- be informed about the processing of Your personal data;
- obtain access to data relating to You and review Your personal data that We process;
- require rectification and completion of inaccurate or incorrect personal data;
- require erasure of Your personal data;
- object to the processing of Your personal data on grounds relating to Your particular situation in so far as the processing of Your personal data is based on our legitimate interests; and
- require a restriction on the processing of Your personal data.

You should present Your request for exercising any of the aforementioned rights in the manner described in the 'Contacts' section of this data protection record. We may ask You to specify Your request in writing and to verify Your identity before processing the request. We may refuse to fulfil Your request on grounds set out in applicable data protection legislation.

You also always have the right to lodge a complaint with a competent supervisory authority or with the supervisory authority of the EU member state of Your habitual residence or place of work if You consider that We have not processed Your personal data in accordance with applicable data protection legislation.

# Principles of data security

We respect the confidentiality of Your personal data. Tangible material containing personal data is stored in a locked space to which only designated persons have access. Personal data processed digitally are protected and stored in our information system to which only persons who need such information to carry out their work duties have access to. Such persons have personal user credentials and passwords.

# Contacts

All requests concerning the use of the rights mentioned above, questions about this data protection record and any other contacts should be made by e-mail to Maija Gohlke-Kokkonen to the address <a href="mailto:info@fimvo.fi">info@fimvo.fi</a>. You may also contact us in person in our offices or in writing to the following address:

Suomen Lääkevarmennus Oy Maija Gohlke-Kokkonen PL108 (Porkkalankatu 1) 00180 Helsinki