

# TUOKKO OÜ PRIVACY STATEMENT

Date: 01.08.2019

The purpose of this data protection statement is to describe the data protection processes of Tuokko OÜ (hereinafter referred to as “controller”). We ask you to read this privacy policy before using our services.

Copy of the privacy policy is available on our website [www.tuokko.ee/privacy-policy](http://www.tuokko.ee/privacy-policy).

## Data controller

Name: Tuokko OÜ

Registration number: 10461162

Address: Pärnu mnt 141 (Delta Plaza, 14 th floor), 11314 Tallinn, Estonia Telephone: +372 667 1600

Email: [tuokko@tuokko.ee](mailto:tuokko@tuokko.ee)

## Data Protection Officer (DPO)

Name: Johanna Vironmäki

Email: [johanna@tuokko.ee](mailto:johanna@tuokko.ee)

## Registers

- Customer database Directo
- Marketing database MailChimp
- Content management system Wordpress
- Statistical database Google Analytics
- Accounting software Standard Books
- Accounting software Merit Aktiva
- Payroll database Merit Palk
- Accounting software Heeros
- E-invoice system Envoice
- E-invoice system Omniva
- Accounting archive
- Money laundering (AML) and know your customer database (KYC)

## Purpose of processing personal data

Personal data is used for purposes under the General Data Protection Regulation (GDPR), such as maintaining a customer relationship and fulfilling legal obligations. Below is a detailed description of the databases and their purpose.

Directo	<ul style="list-style-type: none"><li>• Care and maintenance of customer relationships</li><li>• Customer Letters and Newsletters</li><li>• Customer inquiries and collection of customer information</li><li>• Implementation of services</li><li>• Sales and management of products and services</li><li>• Billing</li><li>• Marketing and development of services</li></ul>
MailChimp	<ul style="list-style-type: none"><li>• Contact via website</li><li>• Submission of Expert Material</li><li>• Information about current events, trainings, etc.</li></ul>
WordPress	<ul style="list-style-type: none"><li>• Processing of forms</li><li>• Analysis of statistics</li><li>• Ensuring system functionality for users</li><li>• Implementation of services</li></ul>
Google Analytics	<ul style="list-style-type: none"><li>• Website statistics</li></ul>
Standard Books	<ul style="list-style-type: none"><li>• Customer Relationship Management</li><li>• Implementation of services</li></ul>

	<ul style="list-style-type: none"> <li>• Product and service management</li> <li>• billing</li> </ul>
Merit Aktiva	<ul style="list-style-type: none"> <li>• Implementation of financial services</li> </ul>
Merit Palk	<ul style="list-style-type: none"> <li>• Implementation of payroll calculation</li> <li>• Provision of payroll information</li> </ul>
Heeros	<ul style="list-style-type: none"> <li>• The tool provides clients with accounting material</li> <li>• Implementation of business financial management services</li> </ul>
Envelope	<ul style="list-style-type: none"> <li>• Delivery of invoices to customers electronically</li> <li>• Delivery of invoices on behalf of clients</li> </ul>
Omniva	<ul style="list-style-type: none"> <li>• Delivery of electronic and paper invoices</li> <li>• Receiving invoices</li> <li>• Billing management</li> </ul>
Accounting archive	<ul style="list-style-type: none"> <li>• Preservation of accounting records</li> </ul>
AML & KYC	<ul style="list-style-type: none"> <li>• Know and identify customers in accordance with the Money Laundering Act</li> </ul>

### Information content of the register

The information stored in the registers is usually derived from the customer itself or from public sources. The registers do not store personal data belonging to a specific category of personal data within the meaning of Article 9 of the General Data Protection Regulation. In principle, processing is based on an agreement between the customer and the controller, but may also be based, for example, on a legitimate interest or on another of the grounds mentioned in Article 6 of the Data Protection Regulation.

Directo	<ul style="list-style-type: none"> <li>• Customer Feedback Data</li> <li>• Order, billing and shipping information</li> <li>• Customer company and representative information</li> <li>• Customer contact information</li> <li>• accounting Resources</li> <li>• classification information</li> <li>• marketing Authorization</li> </ul>
MailChimp	<ul style="list-style-type: none"> <li>• Analytics related information</li> <li>• Information collected from social media channels</li> <li>• Customer company and representative information</li> <li>• Customer contact information</li> </ul>
WordPress	<ul style="list-style-type: none"> <li>• Website analytics related information</li> <li>• Device identification information for forms</li> <li>• Information to be submitted through forms</li> </ul>
Google Analytics	<ul style="list-style-type: none"> <li>• Website analytics related information</li> <li>• Marketing statistics</li> </ul>
Standard Books	<ul style="list-style-type: none"> <li>• Customer company and representative information</li> <li>• Customer contact information</li> <li>• accounting Resources</li> <li>• classification information</li> </ul>
Merit Aktiva	<ul style="list-style-type: none"> <li>• Customer's company and contact information</li> <li>• accounting Resources</li> </ul>
Merit Palk	<ul style="list-style-type: none"> <li>• Payroll related information</li> <li>• Customer Employee Information</li> <li>• Customer company and representative information</li> </ul>
Heeros	<ul style="list-style-type: none"> <li>• Information relating to the implementation of the accounts</li> <li>• Customer company and representative information</li> <li>• accounting Resources</li> </ul>
Envelope	<ul style="list-style-type: none"> <li>• billing information</li> <li>• bills</li> </ul>
Omniva	<ul style="list-style-type: none"> <li>• billing information</li> <li>• bills</li> <li>• Customer contact information and addresses</li> </ul>
Accounting archive	<ul style="list-style-type: none"> <li>• accounting Resources</li> </ul>

	<ul style="list-style-type: none"> <li>• Financial statements</li> </ul>
AML & KYC	<ul style="list-style-type: none"> <li>• Identity documents of customer representatives and beneficiaries</li> <li>• Information on the nature and extent of the business and any other information relevant to knowing and identifying the customer</li> </ul>

### Regular sources of information

Directo	<ul style="list-style-type: none"> <li>• Customer information and information generated in connection with the service</li> </ul>
MailChimp	<ul style="list-style-type: none"> <li>• Information entered by the customer</li> <li>• Website analytics</li> </ul>
WordPress	<ul style="list-style-type: none"> <li>• Information collected from the user's device</li> <li>• Information entered by the customer</li> </ul>
Google Analytics	<ul style="list-style-type: none"> <li>• Information collected from the user's device</li> <li>• Information from search engines for marketing targeting</li> </ul>
Standard Books	<ul style="list-style-type: none"> <li>• Accounting materials and other information obtained from customers</li> </ul>
Merit Aktiva	<ul style="list-style-type: none"> <li>• Accounting materials and other related information received from customers</li> </ul>
Merit Palk	<ul style="list-style-type: none"> <li>• Information from customers</li> <li>• Registrars' financial records</li> </ul>
Heeros	<ul style="list-style-type: none"> <li>• Information received from customers to implement financial management services</li> </ul>
Invoice	<ul style="list-style-type: none"> <li>• Controller financial management information systems</li> <li>• Information provided by the customer</li> </ul>
Omniva	<ul style="list-style-type: none"> <li>• Controller financial management information systems</li> </ul>
Accounting archive	<ul style="list-style-type: none"> <li>• Registrars' financial records</li> </ul>
AML & KYC	<ul style="list-style-type: none"> <li>• Information provided by the customer and copies of their identity documents</li> <li>• Information on government records related to business prohibitions</li> </ul>

### Disclosure of information

Information is not routinely disclosed outside the EU or EEA. The registrar may, for example, disclose the registry information to the authorities when required by law.

### Retention periods for data sets

Directo	<ul style="list-style-type: none"> <li>• As a general rule, data will be retained for 10 years, after which time data will be deleted to the extent permitted by law (certain categories of data may have a longer retention period)</li> </ul>
MailChimp	<ul style="list-style-type: none"> <li>• The material is kept for a maximum of 5 years, after which it is deleted</li> </ul>
WordPress	<ul style="list-style-type: none"> <li>• The material is kept for a maximum of 5 years, after which it is deleted</li> </ul>
Google Analytics	<ul style="list-style-type: none"> <li>• Personalized user information is retained for a maximum of 2 years, after which it is deleted or anonymized</li> </ul>
Standard Books	<ul style="list-style-type: none"> <li>• As a general rule, data will be retained for 10 years, after which time data will be deleted to the extent permitted by law (certain categories of data may have a longer retention period)</li> </ul>
Merit Aktiva	<ul style="list-style-type: none"> <li>• As a general rule, data will be retained for 10 years, after which time data will be deleted to the extent permitted by law (certain categories of data may have a longer retention period)</li> </ul>
Merit Palk	<ul style="list-style-type: none"> <li>• As a general rule, data will be retained for 10 years, after which time data will be deleted to the extent permitted by law (certain categories of data may have a longer retention period)</li> </ul>
Heeros	<ul style="list-style-type: none"> <li>• As a general rule, data will be retained for 10 years, after which time data will be deleted to the extent permitted by law (certain categories of data may have a longer retention period)</li> </ul>

Envelope	<ul style="list-style-type: none"> <li>As a general rule, data will be retained for 10 years, after which time data will be deleted to the extent permitted by law (certain categories of data may have a longer retention period)</li> </ul>
Omniva	<ul style="list-style-type: none"> <li>As a general rule, data will be retained for 10 years, after which time data will be deleted to the extent permitted by law (certain categories of data may have a longer retention period)</li> </ul>
Accounting archive	<ul style="list-style-type: none"> <li>As a general rule, data will be retained for 10 years, after which time data will be deleted to the extent permitted by law (certain categories of data may have a longer retention period)</li> </ul>
AML & KYC	<ul style="list-style-type: none"> <li>Data will be retained for as long as required by law.</li> </ul>

### Principles of the data protection

Databases are protected against unauthorized use and processed and stored in a secure manner. The controller has undertaken to protect the register data as provided for in the legislation. The use of the register is protected by personal user IDs and passwords, and users are bound by the obligation of confidentiality. The data are processed only by persons who have the right to do so.

### Cookies

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### Right to access data

Data subjects have the right to know what personal data the controller processes about the data subject. The data subject may, if he or she so wishes, inspect the personal data stored about him or her free of charge by submitting a request to the Data Protection Officer or by acting in person at the office of the controller. The right to inspect is, in principle, free of charge, but if the data subject submits several requests, the controller may charge reasonable compensation for the inspection.

Under the GDPR, the data subject must adequately identify himself or herself. The identity may be verified, for example, by means of a valid passport or an identity card issued to a citizen or by means of an electronic certificate notified within the European Union.

Data access requests shall be concluded within 30 days of the submission if no additional time is requested in the case, for example due to exceptional circumstances. The DPO informs data subject within 10 days that the request has been processed if the request has been submitted electronically.

### Data rectification and right to be forgotten

The data subject has the right to rectify incomplete and obsolete data and to be forgotten in accordance with Article 17 of the GDPR. However, forgetting, i.e. erasure or anonymisation of data, can only be carried out to the extent that the law does not oblige data to be stored, for example. Requests for rectification and erasure of data shall be addressed to the DPO.

The data subject has the right to prohibit the controller from processing data concerning him or her, direct advertising, distance selling and other direct marketing, for market and opinion surveys. The request shall be submitted to the DPO.

### Objection to processing and data leak

The data subject has the right to require the controller to cease processing personal data if there is no legal basis or the data has been processed in such a way that the data protection of the data subject has been compromised. The data subject may contact the Data Protection Officer in order to exercise the right to object to the processing of personal data.

If the controller detects a leak of information or if such leakage becomes apparent, the controller shall notify the data subject within 72 hours at the latest and make the relevant notifications to the data protection authority.

You have the right to appeal to the Data Protection Authority about the processing of personal data by the controller if you notice any shortcomings. National data protection authority in Estonia is Andmekaitse Inspektsioon ([aki.ee](http://aki.ee)) and in Finland is Tietosuojavaltuutettu ([tietosuoja.fi](http://tietosuoja.fi)). We recommend that you contact local data protection office.