

# Privacy Policy Tyrsky Consulting Ltd

This is a disclosure in accordance with the General Data Protection Regulation of the European Union (679/2016) regarding the processing of personal data.

## Data Controller

Tyrsky Consulting Ltd  
Business ID: 2602934-6

## Contact for Privacy Matters

Pirjo Jantunen  
Email: [pirjo.jantunen@tyrskyconsulting.fi](mailto:pirjo.jantunen@tyrskyconsulting.fi)

For all inquiries related to the processing of personal data and situations involving the exercise of individual rights, the data subject is encouraged to contact the designated contact person mentioned above.

## Basis and Purpose of Personal Data Processing

The legal basis for processing personal data is:

- Consent given by the data subject for the processing of personal data
- Contractual relationship between the data subject and the data controller
- Legitimate interests of the data controller, based on the customer relationship, direct marketing, scientific research, and statistics

The purposes of processing personal data include communication with customers and stakeholders, as well as various investigative projects.

## Regular Sources of Data

Personal data are regularly obtained from the following sources:

- The data subject themselves
- Messages sent through web forms
- Email
- Phone
- Social media services
- Contracts
- Customer meetings and other situations where the customer provides their information

- Open online sources

## Processed Personal Data

The data controller collects only personal data that are essential and necessary for the purposes described in this privacy policy. The processed data may include:

- Name
- Position
- Company/organization
- Contact information (phone number, email address, address)
- Website addresses
- IP address for internet connections
- User profiles on social media platforms
- Information about ordered services and their modifications
- Billing information
- Other information related to customer relationships and ordered services

## Disclosure of Personal Data

Personal data are not generally disclosed to third parties. Exceptions include consortium projects where personal data may be disclosed to consortium partners or funders when necessary (e.g., for organizing events). Information may also be disclosed to authorities as required by law.

## Transfers of Personal Data to Third Countries

Tyrsky Consulting Ltd does not transfer personal data outside the European Union and the European Economic Area. However, we use online services located in the United States, and users provide their consent in writing for such usage.

For sending newsletters, we use the MailChimp service. When subscribing to newsletters, the first name, last name, and email address are transferred to MailChimp's server, which is located outside the European Union. For more information about MailChimp's data processing agreement: [https://mailchimp.com/legal/data-processing-addendum/#6.\\_International\\_Transfers](https://mailchimp.com/legal/data-processing-addendum/#6._International_Transfers)

For video conferencing, we use the Zoom service. Zoom may process users' personal data (name, email address, IP address) and meeting information (name, date, and duration). Only administrators of Tyrsky Consulting Ltd have access to this information. Event organizers may also have access to individual event data. For more information about Zoom's data processing agreement: <https://explore.zoom.us/en/gdpr/>

For surveys and event registrations, we use the SurveyMonkey service. Commonly collected data include first name, last name, and email address. In anonymous surveys, no personally identifiable information is collected, and data is only collected with user consent. For more information about SurveyMonkey's parent company Momentive Inc.'s data processing agreement: <https://help.surveymonkey.com/en/policy/data-processing-agreements-eu/>

## Protection of Personal Data

The data controller processes personal data in a manner that ensures their appropriate security, including protection against unauthorized processing and accidental loss, destruction, or damage. The data controller employs appropriate technical and organizational security measures, including firewalls, encryption techniques, secure facilities, access control, careful management of user accounts for information systems, and guidance for personnel involved in personal data processing. All employees processing personal data are subject to confidentiality obligations under the Employment Contracts Act (55/2001) and supplementary confidentiality agreements.

## Retention Period for Data

If a person does not request the removal of their personal data from the register as described below, the data controller will delete the data when their processing is no longer relevant for the stated purposes.

## Rights of the Data Subject

### *Right to Access Personal Data*

The data subject has the right to confirm whether personal data concerning them are being processed and, if so, to obtain a copy of the personal data.

### *Right to Rectify Data*

The data subject has the right to request the correction of inaccurate and incomplete personal data concerning them. The data subject also has the right to have incomplete personal data supplemented with additional information.

### *Right to Erasure*

The data subject has the right to request the deletion of personal data concerning them if:

- The personal data are no longer necessary for the purposes for which they were collected.
- The data subject withdraws their consent on which the processing is based, and there is no other legal basis for the processing.
- The personal data have been unlawfully processed.

### *Right to Restrict Processing*

The data subject has the right to restrict the processing of personal data concerning them if:

- a. The data subject contests the accuracy of the personal data.
- b. The processing is unlawful, and the data subject opposes the erasure of personal data and requests the restriction of their use instead.
- c. The data controller no longer needs the personal data for the original purposes of processing, but the data subject requires them for the establishment, exercise, or defense of legal claims.

#### *Right to Object*

The data subject has the right to object to the processing of personal data based on their specific situation. The data controller shall no longer process the personal data unless they demonstrate compelling legitimate grounds for the processing that override the interests, rights, and freedoms of the data subject, or for the establishment, exercise, or defense of legal claims. If personal data are processed for direct marketing purposes, the data subject has the right to object at any time, including profiling related to such direct marketing.

#### *Right to Withdraw Consent*

The data subject has the right to withdraw their consent to the processing of personal data at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

#### *Right to Data Portability*

The data subject has the right to receive the personal data concerning them that they have provided to the data controller in a structured, commonly used, and machine-readable format and has the right to transmit those data to another data controller.

#### *Right to Lodge a Complaint with a Supervisory Authority*

The national supervisory authority for data protection matters is the Office of the Data Protection Ombudsman under the Ministry of Justice. The data subject has the right to lodge a complaint with the supervisory authority if they consider that the processing of personal data relating to them infringes relevant legislation.