



# Privacy Policy – Marketing communications

Last update: 11 June 2024

## Introduction

We value your fundamental right to privacy. As a company based in the European Union, we adhere to our obligations under the General Data Protection Regulation (GDPR). In this document, we inform you about our processing of your personal data if you receive marketing communications from us.

For clarity, we have divided the privacy policy into two parts:

- Part 1 contains general information about personal data processing.
- Part 2 applies to the processing of your personal data as a recipient of our marketing communications.

If you have any questions or concerns regarding the processing of your personal data, please don't hesitate to contact us:

Ceili Oy

Privacy team

[support@ceili.fi](mailto:support@ceili.fi)

We may update our privacy policies from time to time. The date of last update is shown above. Minor changes will be shown in this document, and we ask that you review it regularly. Changes that significantly affect your rights and freedoms will be communicated to you by email or notification if we have your contact details.

## Part 1: General information

### Categories of personal data

As a recipient of our marketing communications we regularly process certain categories of your personal data. These are:

- Name, contact details and position (e.g. your title at the company that you represent)
- Messages and correspondence

(Some of these categories are normally information related to the company that you represent, but in some cases such information may be considered your personal data under the GDPR.)

Occasionally, we process certain additional categories of your personal data. These are:

- Technical identifiers (e.g. device identifiers, IP addresses, geolocation data)
- Video and sound recordings and photographs (e.g. if we record a video seminar that you attend, or if we record a customer service phone call)
- Preferences and activity (e.g. if we take notes of your customer service interactions and our marketing communication activities with you, or your participation in our events)
- Social media content and other public information (e.g. if we take notes of your company's online presence or check your information for marketing purposes)
- Permissions and prohibitions (e.g. whether you've subscribed to our newsletters or prohibited us from contacting you for direct marketing purposes)

### Mandatory categories of personal data

Some categories of personal data are mandatory in the sense that without certain data, we cannot communicate with you.

In Part 2 of the privacy policy, we have marked clearly which categories of personal data are mandatory for a given purpose.

### Sources of personal data

We primarily process personal data that you give us, for instance when you subscribe to our newsletter or we schedule a sales meeting.

However, in some cases we may receive personal data relating to you from other sources. These are:

- Public records (e.g. company registers, business data services)
- Marketing registers (e.g. if we include your information in our marketing dossier)

- Your company (e.g. if your employer updates your contact details with us)
- Social media and the internet
- Technical sources such as cookies, scripts, and similar technologies (e.g. if you access our website or online services)

## Retention periods of personal data

When processing your personal data, we adhere to the principle of data minimisation. That means we only keep your personal data as long as necessary for the purposes that we describe more in detail below, and only as long as we have a legal basis set out in the GDPR to process the data.

As soon as no relevant purpose or legal basis applies, we will either destroy your personal data or anonymise it in an irreversible manner.

In Part 2 of the privacy policy, we have marked clearly all retention periods of your personal data for a given purpose.

## Sharing your personal data with third parties

As a commercial service provider, we like most other companies have to outsource some of the processing of your data to trusted partners. Because of that, we share certain categories of personal data with third parties.

We always make sure that all disclosures are protected by a contractual arrangement between us and our trusted partners to protect your personal data, as required by the GDPR.

Our trusted partners can be categorised as follows:

### *Website, data storage and technical operations*

- Web hosting companies (e.g. to operate our website and online services)
- Content management services and content delivery networks (e.g. to operate our website and online services and to store and process online data)
- Cloud storage (e.g. to store marketing communications and contract information)
- Online collaboration tools (e.g. if we plan and discuss internally the services that we provide to you)

### *Communications and deliveries*

- E-mail and messaging services

- Video call service providers (e.g. if we have a video call with you or you participate in our webinar)

#### *Financial service providers*

- External accountants and auditors
- Accounting software service providers (e.g. to store our invoices for bookkeeping obligations)
- Banks and payment processors

#### *Professional advisers*

- Law firms
- Business consultants

#### *Marketing communications and contract management*

- Hosted marketing communications services
- Digital signature services
- Calendar and booking services (e.g. to book and handle meetings with you)

#### *Public authorities*

- Any information lawfully requested by a public authority

#### *Mergers and acquisitions*

- Should our company ever be party to a merger or acquisition, your personal data could be transferred to the buyer or another company as a part of the transaction

#### *Transfers to other controllers*

- We use Google Analytics on our website. The data collected for those purposes will be shared with Google, who uses the data also for its own purposes (e.g. for providing its marketing solutions). In that case, Google acts as a joint controller or as an independent controller of your personal data. Read more here:

<https://support.google.com/analytics/answer/7318509?hl=en>

## Transfers outside the EU/EEA

We normally process your personal data within the European Union and European Economic Area. In some cases, we or our trusted partners process your personal data outside these areas.

Because of that, some of your personal data are transferred to the following countries:

- **United States:** We and our trusted partners make sure that transfers are protected under the EU-US Data Privacy Framework. If not, we and our trusted partners make sure transfers are protected by contractual arrangements using the Standard Contractual Clauses (SCC) issued by the European Commission. Should we be unable to take any of these precautions, ultimately we'll ask for your consent for the transfer.

## Your rights

According to the GDPR, you have various rights as we process your personal data.

These are:

- **Right of access:** You may ask us whether we process any personal data about you, and if we do, you have a right to request a copy of some or all of the data. You also have a right to ask for more information regarding the third-party recipients of your personal data as well as our protective measures applicable to the transfers of your data to our trusted partners and outside the EU/EEA.

If you request a copy of your data, we will send it to you electronically. In most cases we will be glad to accommodate your request, but if we receive repeated or manifestly unfounded requests from you, we may have to refuse or charge a reasonable administrative fee to process your request.

- **Rectifying incorrect or incomplete personal data:** If you consider that some of your personal data that we process is incorrect or incomplete, you may ask us to correct or complete the data. We will investigate your request without undue delay, and accommodate it if we can be sufficiently certain that the request is justified.
- **Erasing personal data (“the right to be forgotten”):** If you don't want us to process your personal data, you may ask us to erase a part or all of it. We will do our best to accommodate your request, but in some cases we may have to refuse or postpone the request. This may happen e.g. if we have an on-going business relationship with you and we need your personal data to perform our services, or if we have a legal duty or a legitimate interest to retain some of your data (we have described these in more detail in Part 2).
- **Restricting the processing of personal data:** If you consider that our processing of your personal data breaches the GDPR or other laws, you may ask us to restrict the processing (i.e. to stop the processing for the time being). We will accommodate your request as well as possible while we investigate the matter.

You may also ask us that we do not erase or otherwise process your personal data if you need the data e.g. in a legal dispute and the erasure or other processing would jeopardise your interests in that regard. We will aim to accommodate your request as well as possible.

- **Objecting to processing of personal data:** As explained in detail in Part 2, we sometimes process your data on the basis of our or someone else's legitimate interest. If that's the case, you may object to our processing of your data on that basis. We will aim to accommodate your request as much as possible, however in some cases the legitimate interests in question may be so important that they outweigh your interest to object.

If that happens, we will let you know about our reasons for not accommodating your request and inform you about your right to lodge a complaint with the relevant data protection authorities.

If we have contacted you for direct marketing purposes, you may also object to our processing of your personal data for that purpose. (In other words, you may prohibit us from contacting you for direct marketing purposes). We will accommodate your request without undue delay.

- **Withdrawing consent:** As explained in detail in Part 2, we sometimes process your personal data on the basis of your consent. If that's the case, you may, at any time, withdraw your consent for that processing. We will accommodate your request without undue delay, however we may continue the processing if we have another legal basis to do so. Please note that withdrawing consent will not affect the prior processing of your personal data.
- **Right to lodge a complaint:** If you consider that our processing of your personal data breaches the GDPR or other laws, you may at any time lodge a complaint with the relevant data protection authorities. In Finland, you can contact the Data Protection Ombudsman: [www.tietosuojafi.fi](http://www.tietosuojafi.fi)

**To exercise any of your above rights, please contact us using the contact details shown at the beginning of the document. We'll be glad to assist you.**

## Cookies and tracking

Like most other companies, we use cookies and similar technologies on our website, online services and in marketing. We will adhere to applicable laws regarding the prerequisites for the processing of your personal data in such ways.

We have described in detail the types of cookies and similar technologies we use as well as their purposes in our [cookie policy](#).

## Part 2: Processing of your personal data

As you receive our marketing communications, we process your personal data in certain ways in the context of that relationship. Here we describe the purposes of processing your personal data together with the appropriate legal bases for the processing, as well as the categories of personal data processed together with their retention periods.

### Purposes and legal bases of the processing of personal data

According to the GDPR, all processing of personal data must be justified using a legal basis found in the law. We use the following legal bases for our processing:

- **Consent:** In some cases, we may ask for your consent to process your personal data. If we receive your consent, we may process your data on that basis within the limits of the consent. For instance, we use cookies for statistical and marketing purposes, which may only be done if we receive your consent.
- **Legitimate interest:** In some cases, we may process your personal data if it's justified for our or someone else's legitimate interest. We only do so after having assessed your rights and freedoms against the importance of the legitimate interest (we conduct a so-called "balancing test").

Here is a complete overview of our purposes of processing and the corresponding legal bases:

Purpose	Legal basis	Examples
<b>Communications</b>	Consent	In some cases, for instance if we contact you using a medium that processes certain technical identifiers, we may ask for your consent for processing the identifiers. Also, we may ask for your consent to send you marketing communications if required by law.
	Legitimate interest	In some cases, we store, retain and process our communications with you for various legitimate interests such as improving our customer service and training our staff.
<b>Sales and marketing</b>	Consent	In some cases, to process your personal data for sales and marketing purposes, we ask for your consent. This is case for instance when we use cookies and similar technologies for such purposes. Also, we

		may ask for your consent to send you marketing communications if required by law.
	Legitimate interest	As a commercial service provider, we often have a justified reason to approach you with the purpose of discussing our offering with you. In those cases, we process your personal data as part of our legitimate interests if permitted by law.
<b>Technical functioning and security</b>	Consent	In some cases we communicate with you using electronic services. This is for instance if you access our website to receive our communications. In those cases we process personal data for the technical functioning of the services. If the processing is not necessary for that purpose (e.g. in case of cookies used to improve the visual appeal of our website), we will ask for your consent to process the data.
	Legitimate interest	In some cases we have a justified reason to ensure the proper functioning and security of our electronic services. In those cases we process certain technical personal data as part of our legitimate interests.

## Categories of personal data processed and their retention times

Below is a list of our retention times for different categories of personal data under a given purpose. Once a specific retention period runs out, we will destroy the relevant personal data or anonymise it irreversibly, unless a different purpose with a longer retention period applies.

For instance, we keep personal data for the purposes of communications (like e-mails containing your name and e-mail address) for 1 year. Once the retention period runs out, we will destroy the relevant data.

Purpose	Category of personal data	Retention period(s)	Examples
<b>Communications</b>  <i>Personal data marked with (*) are mandatory only if you wish to receive</i>	Name, contact details, position (*)	1 year from the communication	We retain personal data from our communications with you for one year in case we want to continue
	Messages and correspondence (*)		
	Technical identifiers (*)		



<i>marketing communications from us.</i>	Social media content and other public information		the discussion at a later time.
<b>Sales and marketing</b>  <i>Personal data marked with (*) are mandatory to the extent that we have a legal duty to acquire your consent or prohibition for sales and marketing purposes.</i>	Name, contact details, position	For the time being	As we have a legitimate interest in approaching you to discuss our offering, we keep your name, contact details and position on file for the time being. This means we may contact you some time in the future unless you prohibit us from doing so.
	Messages and correspondence	3 years from collection and storage	If we haven't had any business dealings with you (or your company) for the past three years, we'll erase or anonymise your personal data unless we continue to retain them under another purpose.
	Video and sound recordings and photographs		
	Preferences and activity		
	Technical identifiers		
	Social media content and other public information		
Consents and prohibitions (*)	Indefinitely	If you have prohibited us from approaching you for sales and marketing purposes, we'll make a note of it and retain it indefinitely (or until you instruct us otherwise).	
<b>Technical functioning and security</b>	Name, contact details, position	Deleted immediately	We'll destroy or anonymise your personal data immediately once they aren't needed

<p><i>Personal data marked with (*) are mandatory to the extent that we have a justified interest in ensuring the technical functioning and security of our electronic services or we have a legal duty to acquire your consent.</i></p>			<p>for the relevant purpose.</p> <p>Note however that our cookie management system stores cookies (which may include your personal data) in accordance with our cookie policy.</p>
	<p>Technical identifiers (*)</p>	<p>1 year from the last active processing</p>	<p>We keep technical identifiers for one year from the last active processing (unless stated otherwise in our cookie policy) in case we need to investigate a technical or security issue in the future.</p>
	<p>Consents and prohibitions (*)</p>	<p>Indefinitely</p>	<p>If you have prohibited us from processing your personal data for non-necessary technical purposes, we'll make a note of it and retain it indefinitely (or until you instruct us otherwise).</p> <p>Note however that our cookie management system stores your cookie and tracking preferences in accordance with our cookie policy.</p>