

## **Olvi Group E-learning privacy policy**

### 1. General

#### 1.1. Name of the register

- Olvi Group E-learning

#### 1.2. Register holder

- *Olvi Oyj / Olvi Group*
- *Olvitie I-IV, FI-74100, Iisalmi, Finland*
- *phone 0290 00 1050*
- *e-mail:*
- *Contact person: Jussi Ahomaa*

1.3. Olvi Oyj has committed to conform to national and European Union legal acts, regulating personal data protection.

1.4. "Personal data" in the present declaration means data, which makes possible to identify specific person. Additionally Olvi Group collects non-personal data, which is used for using the services and not identifying persons.

### 2. The purpose of using the personal data

2.1. Personal data is used in managing E-learning in Olvi Group companies.

### 3. What data is gathered

3.1 Olvi Group gathers contact persons personal data necessary for Olvi Group e-learning. Included is following data: name, employer id, employer, country, department, e-mail address, username, information / answers supplied by the registered person, course attempts and results. Olvi Group might also collect technical data about usage of its' business systems. Such data might include username, IP-address, service logs, and actions taken by user when logged in.

### 4. Sources of data

4.1 Primary sources for personal data are HR systems of Olvi Group companies, and registered person itself. information is gathered also from Olvi Group subcontractors.

### 5. Handing over personal data to third persons

5.1 Personal data may only be transferred for legitimate uses in order to ensure the business process validity. Such action is always a subject to the requirements of the personal data

legislation in force at the time. Personal data in e-learning system can be handled by Olvi Group subcontractor, which has valid data processing agreement with Olvi Group.

5.2 Olvi Group may also disclose the information when required by the competent authorities or other entities in accordance with current legislation whether for enforcing the service terms or ensuring the security of the service.

5.3 Information may be disclosed in the event of a possible acquisition, merger, outsourcing or business transaction, and in connection with a group relationship or other economic association with those parties.

5.4 Data will not be transferred to third parties for marketing purposes without registered person's consent. Data will be transferred to third parties, in case the registered person has given their consent, e.g. for binding the services to the services of the other providers like social media or others.

## 6. Transfer of data outside EU or ETA

6.1 Normally Olvi Group does not transfer data outside EU or ETA. However, E-learning is accessible in all Olvi Group companies, and Olvi Group companies located outside EU are following Olvi Group guidelines and EU GDPR, and have valid agreements regarding these.

## 7. Protecting the register

7.1 Olvi Group's registers will be protected by proper technical and organizational measures. Olvi Group also makes sure that its' systems are backed up and recoverable.

7.2 Registers shall be protected by proper administration, access control, firewalls and password protection. Access to the system is only available for Olvi Group employees or contractual partners.

7.3 There is limited access to the manual records of the person register only to Olvi Group's employees and Olvi Group's subcontractors who have reasonable need for the Information.

## 8. Rights of the registered person

8.1 The processing of personal data is subject to the requirements of the personal data legislation in force at the time.

8.2 The registered person has the right to inspect the information contained in Olvi Group's person registers.

8.3 The data subject has the right to ask from Register Holder for incorrect personal data about him / her to be corrected, supplemented or removed from the register if the information is incorrect, unnecessary, incomplete or outdated for the purpose of processing the personal data.

## 9 Personal data retention time

9.1 The retention time of personal data is subject to the requirements of the personal data legislation in force at the time.

## 10 Monitoring and notification of breaches

- 10.1 Olvi Group arranges proper organisational and technical monitoring for its' personal registers
- 10.2 Olvi Group informs about security risks and possible threats directly to proper authorities or registered person as required by law.