

REGISTRATION DOCUMENT AND INFORMATION DOCUMENT FOR REGISTRATION v.1.0 - 18.4.2018

Pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council, the "General Data Protection Regulation") and Articles 10 & 24 of the Personal Data Act.

** The English version of this contract has been translated from Finnish, in cases of dispute of disparity, the Finnish version of the contract will take precedence.**

GENERAL	<p>This document provided by DBC Global Ltd is to inform you about the processing of your personal information, the grounds for processing data, and your rights regarding your personal information being processed.</p> <p>We ask you to familiarize yourself with this document and contact us if you have a question about this.</p>
REGISTRAR	<p>Name: DBC Global Oy</p> <p>Address: Leppävaarankatu 9c 02600 Espoo</p> <p>Email address: esa.parjanen@dbc.fi (CEO)</p> <p>Telephone number: 044 208 6801</p>
RESPONSIBLE FOR DATA PROTECTION	<p>Name: Ali Laitasaari</p> <p>Address: Leppävaarankatu 9c 02600 Espoo</p> <p>Email address: ali.laitasaari@dbc.fi</p> <p>Telephone number: +358 50 300 0533</p>
REGISTER	DBC Global Ltd's customer register
CUSTOMER REGISTER	DBC Global Ltd is responsible for the information security related to the DBC customer register as well as for the security and technical maintenance of the registry. Please address your requests and questions on this topic to DBC Global Ltd's Data Protection Officer.
REGISTERED GROUPS AND	Your datas will be collected because you are: - Our customers

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<p>EMERGENCY BOARDS</p>	<p>The following information is collected from you:</p> <ul style="list-style-type: none"> - Name - Telephone - Address - Email address - Social Security Number (if applicable) - IP address - Service billing and payer information - Consent and bans on your personal information
<p>PERSONAL DATA SURVEYS</p>	<p>Your information will primarily be obtained from you in connection with the customer contract and the interactions during the customer relationship.</p> <p>Associated information may also be obtained from the following sources:</p> <ul style="list-style-type: none"> - public registers - from our partners, on the basis of your consent
<p>PURPOSE OF HANDLING OF PERSONAL DATA AND LEGAL BASIS</p>	<p>Personal data relating to you are collected, processed, used, and stored in data systems:</p> <ul style="list-style-type: none"> - Based on your consent the collected data will be used to manage the customer relationship, enforce a contractual relationship, and implement a marketing agreement - because, as a customer, you are in contractual relationship with us, the processing of data is necessary to implement and maintain the contractual relationship - the implementation of our obligations are governed under the law, and accounting law, and the acts adopted pursuant to these laws - for the possible formulation, presentation, and defense of any legal relationship between the parties
<p>OBLIGATION GIVES PERSONAL DATA AND ANSWER PERFORMANCE</p>	<p>You are obliged to provide you with personal information relating to yourself in contractual relations necessary for the implementation of the contract and for the performance of the contractual rights and obligations, including for the purpose of presenting or defending legal relationships of a contractual nature.</p> <p>If you do not provide personal information, the agreement cannot be implemented.</p>
<p>WITHDRAWAL OF THE SUFFICIENT</p>	<p>You have the right to revoke your consent for processing your personal information.</p>

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	<p>You may cancel your consent by submitting a relevant email to ali.laitasaari@dbc.fi</p> <p>Your withdrawal of your consent will have no effect on the lawfulness of the processing of your personal information prior to your cancellation, nor on the statutory obligation to retain your data.</p>
RELEASE OF PERSONAL DATA	<p>Your information may be over to the following recipients:</p> <ul style="list-style-type: none"> - Our Accounting Office to manage the associated accounting and billing tasks - Information system vendor, for storing data and providing information related to the information system - Our collection agency to recover our receivables - A court or other authority or a responsible party with statutory right of access - Another natural or legal person, whose vital interests are to be provided is necessary, if it is considered that your rights to privacy according to the legal basis referred to above are fulfilled - Data may be disclosed for research purposes to the extent and insofar as the law provides
AUTOMATIC HANDLING OF PERSONAL DATA (PROFILING AND OTHER SIMILAR ACTIVITIES)	<p>The processing of your personal information does not involve automatic processing such as profiling or other similar actions.</p>
TRANSFER OF INFORMATION TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS	<p>Your data will not be transferred to third countries or to international organizations.</p>
DESCRIPTION OF THE PRINCIPLES OF PRIVACY POLICY	<p>Your data will be processed in a very confidential manner and only as described in this Privacy Statement and for the purposes described.</p> <p>The information is protected, both technically and organisationally, in such a way that:</p> <ol style="list-style-type: none"> 1) data processing equipment can only be used by persons

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	<p>authorized to access data, which is ensured by user names and passwords (Access Control)</p> <p>2) the data may only be processed by persons authorized to use the data processing system and only to the extent strictly required by their duties (Access Control), which is ensured by organizational and contractual action</p> <p>3) Unauthorized reading, copying, modification or deletion of data through devices is prohibited (Computer Surveillance) by implementing appropriate technical measures such as encryption and protection of devices by passwords and usernames</p> <p>4) unauthorized access to personal data, unauthorized access to the system, unauthorized viewing, modification or deletion of personal data stored on the system is prohibited and controlled (Storage Control)</p> <p>5) preventing the use of personal data processing system (User Control) by firewalls and similar technical solutions,</p> <p>6) ensure that the system is functioning and that the detected errors of operation are reported (Reliability) and that the system malfunction can not harm the stored personal data (integrity), which is carried out by means of load tests and other similar technical measures</p>
<p>CURRENT TIME OF INFORMATION</p>	<p>The information is retained for at least as long as it is necessary to establish, present or defend a legal claim based on the processing criterion, such as a contractual legal claim.</p> <p>If the retention of data is based on legislation, data shall be kept for at least the minimum time required for such legislation.</p>
<p>ON USE OF DATA - IN ANY OTHER PRESENTED USE</p>	<p>Your data will not be processed for purposes other than those mentioned above without your explicit express consent.</p>
<p>YOUR RIGHTS RELATED TO YOUR OWN INFORMATION</p>	<p>You have the rights below to deal with your personal information. If you want to use the rights listed below or you have questions about them, please contact us at: ali.laitasaari@dbc.fi.</p>

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	<ul style="list-style-type: none"> <p>● Access to information</p> <p>You have the right to receive additional information about the topics listed in this document and to confirm whether your personal information will be processed. You also have the right to retrieve the personal data being processed.</p> <p>● Right to correct information</p> <p>You have the right to request rectification of your inaccurate and incorrect personal data and the right to obtain personal data supplemented by an additional explanation.</p> <p>As a rule, our company does not disclose personal and customer information to anyone outside our company. If we have surrendered your personal data, we will notify you about any recipient to whom your personal information has been disclosed, the use of your entitlement and its impact on your personal information unless this proves impossible or requires unreasonable trouble. We will notify you of these recipients at your request.</p> <p>● Right to Clear Data ("Right to Be Forgotten")</p> <p>You have the right to request that we discard your information if:</p> <ul style="list-style-type: none"> - information is no longer needed for the original use and is not retained for reasons of legal regulation - cancel your consent to the processing of your information, and no data base on the processing or retention of data is legally due - processing of data is based on the action to secure and safeguard the legitimate interests of you or a third party that you are opposed to a specific matter on your basis, unless there is an important or legitimate reason for doing so or if it is not necessary to present
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	<p>a legal claim or defending it</p> <ul style="list-style-type: none"> - processing of data is based on direct marketing or related activities - personal data has been processed unlawfully - personal data must be removed to comply with the statutory obligation to us <ul style="list-style-type: none"> ➤ It is a minor information that has been drawn directly on the basis of electronically provided remote services targeted at them <p>If we have disclosed your personal information and when requesting deletion, you have the right to ask us to contact the registrar who have used your information and request that your request for deletion and request them to remove the personal links or copies of these personal data.</p> <p>Data deletion will not take place if data processing is required:</p> <ul style="list-style-type: none"> - to exercise the right to freedom of expression and freedom of information; - To comply with the statutory obligation to us - for public interest archiving purposes or for historical research purposes or statistical purposes - for the preparation, presentation or defence of a legal claim. <p>As a rule, our company does not disclose personal and customer information to outside our company. If we have disclosed your personal data, we inform each recipient to whom the personal data have been disclosed, the use of the rights referred to herein and the effects of the personal data loss, unless this proves to be a possible payment or requires</p>
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	<p>unreasonable trouble. We will notify you of these recipients at your request.</p> <p>Right to limit processing</p> <p>You have the right to request the processing of your personal data, during which we can handle, except for storage, only on the following grounds:</p> <ul style="list-style-type: none"> - with your consent for the preparation, presentation or defense of a legal claim third-party rights protection-order, or important public interest reasons <p>You may request limitation of processing:</p> <ul style="list-style-type: none"> - For the time when the correctness of the information will secure you to deny the accuracy of the information - When handling is illegal and you are opposed to your removal and you require a ban on your use - If the processing criterion is no longer met, but you need information to prepare, present or defend a legal claim <p>If the processing of your information is restricted, we will notify you before the deletion of the processing is removed</p> <p>If we have disclosed your personal information, we disclose to you every recipient to whom your personal information has been disclosed, the use of your entitlement here and it's impact on your personal information, unless this proves impossible or requires unreasonable trouble. We will notify all of these recipients at your request.</p> <p>Right to transfer data from one system to another</p> <p>You have the right to receive personal information about you that you have provided us in a structured, generally used, and machine-readable form; and the right to transfer</p>
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	<p>this information to another Registrar or directly from us to such a Registry if it is technically feasible:</p> <ul style="list-style-type: none"> - if processing is performed automatically; - and it is based on the consent or agreement you have given as a party or a pre-contractual arrangement on your request; - and does not adversely affect other rights and freedoms <p>Your use of this right is without prejudice to the above mentioned right to delete information.</p> <p>The right to resist the processing of personal data You have the right related to personal special situation at any time, to resist handling of your personal data, which is necessary for the performance of our or any legitimate third party interests, unless we can prove that there is an important, well-founded reason for doing so or if it is not necessary to formulate, present or defend in the law.</p> <p>You have the right at any time to oppose the processing of your personal data on direct marketing and related tasks, such as profiling, after which your data will not be used for any such purpose.</p> <p>The right not to be subject to the automatic processing of personal data, such as profiling,</p> <p>You have the right not to be subject to a decision based solely on automatic processing, such as profiling, which has legal consequences for you or which will affect you in the same way, unless the decision:</p> <ul style="list-style-type: none"> - Is already between the parties for the purpose of negotiating or implementing the contract - not approved by law; or - Based on your explicit consent <p style="text-align: center;">If the decision is based on the agreement or implementation or consent of the contract, you have the right to demand</p>
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	that the information is processed by our natural person as well as the right to state your position and challenge the decision.
THE RIGHT TO COMPLY WITH SELF-REGULATION	<p>If you consider that our processing of your personal data is in violation of our statutory obligations and your rights, you can contact our Privacy Service once you have settled your case first with us:</p> <p>Office of the Data Protection Officer</p> <p>Visiting address: Ratapihantie 9, 6th floor, 00520 Helsinki</p> <p>Postal address: PL 800, 00521 Helsinki</p> <p>Gear: 029 56 66700</p> <p>Fax: 029 56 66735</p> <p>Email: data.protection@om.fi</p> <p>The EDPS provides guidance and advice on the processing of personal data and supervises the lawfulness of the processing of personal data.</p>

Document Information

Project:	ISO 13485
Doc.Name:	DATA PROTECTION SUPPORT DBC Global Oy
File Name:	2.3. Software – User Management

Change History

Version	Approved by/date:	Author	Date	Description
v. 1.0	Esa Parjanen 21.5.2018	Ali Laitasaari	20.5.2018	Data Protection Support DBC Global Oy

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