

PRIVACY POLICY

This document is the Privacy policy of ENZALGU (“Enzalgu” or “we”). Read more about how we protect your privacy and personal data.

ENZALGU provides management consulting services, creative services and products and educational services (“Services” or “Products”) related to social responsibility, including but not limited to Diversity, Equity and Inclusion consulting and procurement services, art and education services. Any Service or Product may be provided by us individually or jointly with another business or partner. We comply with the applicable data protection legislation for the processing of personal data, including but not excluded to the General Data Protection Regulation of the European Union (EU 2016/679) and the Data Protection Act (1050/2018).

This privacy policy (“Privacy Policy”) is applies to the processing of personal data collected by ENZALGU in connection with the provision of the Services (as defined above) and other business operations, and where Enzalgu acts as the data controller.

In this Privacy Policy, the word “User” or “you” refers to individuals as private customers as well as representatives of our customer organizations and business partners.

This privacy policy may be updated to reflect changes in our data processing practices. We are happy to answer any questions you may have regarding the processing of your personal data or help if you choose to use you right as a data subject. In these cases please contact us in the addresses provided below.

1

Data Controller

Name: Enzalgu
Business ID: 3431595-9
Address: PL 12, 01361 Vantaa
<https://enzalgu.fi>

Contact person:
Mirva Haltia-Holmberg
mirva@enzalgu.fi

2

In this Privacy policy we refer to the personal data we process as “Personal Data”. We collect and process primarily the data you provide us directly. This data includes but is not limited to:

- Basic information, such as:
 - Your first name and last name
 - Contact information, such as email, telephone number and address
- Other information you directly provide us at any stage, such as:
 - payment information
 - company name, company address and title in the company
 - survey data

3

How and why we process your data

We process Personal Data for different legitimate grounds. This section describes the type of data we may process as well as the legal grounds for processing it.

We process your Personal Data for different purposes:

To provide services and process contact requests

We process your Personal Data to be able to process contact requests for future partnerships, to provide services and maintain customer relations. We also process data to when entering into contract with you, to carry out our contractual obligations. Processing of this nature is based on the GDPR Article 6(1)b and 6(1)f.

To fulfill our legal obligations

We process Personal Data to to fulfill our obligations under law. Processing of this nature is based on the GDPR Article 6(1)c.

To handle claims and legal processes

We may process Personal Data to be able to respond or defend against legal claims, such as claims handling, debt collection, fraud prevention and other legal processes. We may also Processing of this nature is based on the GDPR Article 6(1)c.

For marketing and communication

We may process Personal Data for analytics on our website, for purpose of contacting Users regarding the Services and Products, for informing Users changes in services and for marketing our services. We may also process information of ownership of sold art to contact the owner regarding owned art use in exhibitions or other purposes.

For developing our services

We may also process information about your Personal Data for running analytics and developing our services. When ever possible, our analytics does not include data that could personally identify an individual, but rather work with non-identifiable and aggregated data. In case the analytical data includes Personal Data we will ask your explicit consent for the data processing. Processing of this nature is based on the GDPR Article 6(1)a.

4

Transfer of Personal Data

We process personal data primarily within the EU area. However, we or our service providers may transfer personal data to or access it in jurisdictions outside the EU/EAA area.

We will take steps to ensure that your personal data receives an adequate level of protection in the jurisdictions in which it is processed. We provide adequate protection for the transfers of Personal Data to countries outside of the EEA through a series of agreements with our service providers based on the Standard Contractual Clauses.

For more information on the transfer of personal data, you can contact us by using the contact details indicated above.

5

Sharing of Personal Data

We only share your Personal Data within our organisation as far as reasonably necessary for the purposes of this Privacy Policy.

We do not share your Personal Data with third parties outside of our organisation unless one of the following circumstances applies:

For the purposes set out in this Privacy Policy and to authorized service providers

We may provide your personal data to authorised service providers who perform services for us (for example: data storage, accounting, sales and marketing service providers), provide the data based on your consent as well as supply data to third parties based on legal obligation or legitimate interest.

When your personal data is processed by third parties as service providers on behalf of Enzalgu, the appropriate contractual and organizational measures are taken to ensure that personal data is processed exclusively for the purposes specified in this Privacy Policy and in accordance with applicable laws and regulations. In addition, measures are taken to ensure appropriate confidentiality and security measures are taken according to our instructions regarding your Personal Data.

For legal reasons and legal process

We may share your Personal Data with third parties outside our organisation if we have a good-faith belief that access to and use of the Personal Data is reasonably necessary to: (i) meet any applicable law, regulation, and/or court order; (ii) detect, prevent, or otherwise address fraud, crime, security or technical issues; and/or (iii) protect the interests, properties or safety of Enzalgu, the partners or the public as far as in accordance with the law. When possible, we will inform you about such processing.

For other legitimate reasons

If Enzalgu is involved in a merger, acquisition or asset sale, we may transfer your personal data to the third party involved. However, we will continue to ensure the confidentiality of all personal data. We will give notice to all the partners concerned when the personal data are transferred or become subject to a different Privacy Policy.

With your explicit consent

We may share your personal data with third parties outside Enzalgu when we have your explicit consent to do so. You have the right to withdraw consent at all times.

6

Storing time of data

Enzalgu does not store personal data longer than is legally permitted and necessary for the purposes of this Privacy Policy. The retention period depends on the nature of the information and on the purposes of processing, which means that the maximum period may vary. Most Personal Data will be deleted within 12 months from the completion of the partnership, but the maximum period may vary. Some of the Personal Data may be stored by us only as long as such processing is required by law or is reasonably necessary for our legal obligations or legitimate interests such as claims handling, bookkeeping, internal reporting, and reconciliation purposes.

Any data in relation to surveys executed by Enzalgu is destroyed after the survey has been completed and the report of the survey has been completed. In client commissioned surveys the data is stored until the deliverable has been approved. By latest all survey related data is removed during six (6) months from the closure of the survey.

7

Your rights

Right to access

You have the right to access and be informed about your Personal Data processed by us. We give you the possibility to request a copy of your Personal Data. (GDPR Article 12 and 15)

Right to withdraw consent

In case the processing is based on the consent granted by you, you may withdraw the consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. (GDPR Article 7(3))

Right to rectify

You have the right to have incorrect or incomplete Personal Data we have stored about you corrected or completed by contacting us. (GDPR Article 16)

Right to erasure

You may also ask us to delete your Personal Data from our systems. We will comply with such a request unless we have a legitimate ground to not delete the data. (GDPR Article 17)

Right to object

You may have the right to object to certain use of your Personal Data if such data are processed for other purposes than necessary for the provision of the purpose of this Privacy Policy or for compliance with a legal obligation. (GDPR Article 21)

Right to restriction of processing

You may request us to restrict the processing of Personal Data for example when your data erasure, rectification or objection requests are pending and/or when we do not have legitimate grounds to process your data. (GDPR Article 18)

Right to data portability

You have the right to receive the Personal Data you have provided to us yourself in a structured and commonly used format and to independently transmit those data to a third party. (GDPR Article 20)

How to use your rights

You can exercise your rights by sending an email or a letter to us on the contact addresses listed in this Privacy Policy. Should you choose to contact us, we recommend you to include in your message the information that helps us identify you: your full name, address, email address and phone number. If you do not provide this information, we may request additional information to confirm your identity. We will respond to inquiries usually within a month after request receipt. Please note that we may reject requests that are unreasonably repetitive, excessive, or manifestly unfounded.

8

Direct marketing

You have the right to prohibit us from using your Personal Data for direct marketing purposes, market research or profiling made for direct marketing purposes by contacting us on the addresses indicated above. We offer the possibility to unsubscribe in connection with our direct marketing messages.

9

Information security

We use administrative, organisational, technical, and physical safeguards to protect the Personal Data we collect and process. Measures include for example, where appropriate, encryption, pseudonymisation, firewalls, secure facilities, and access right systems. Our security controls are designed to maintain an appropriate level of data confidentiality, integrity, availability, resilience, and ability to restore the data. We regularly test the Services, systems, and other assets for security vulnerabilities.

Should despite the security measures, a security breach occur that is likely to have negative effects on the privacy of Users, we will inform you and other affected parties, as well as relevant authorities when required by applicable data protection laws, about the breach as soon as possible.

10

Data processors

We use in a regular basis the following data processors:

Google Ireland Limited. See privacy documentation: <https://policies.google.com/privacy>

11

Right to complain

In case you consider our processing of Personal Data to be inconsistent with the applicable data protection laws, a complaint may be lodged with the local supervisory authority for data protection. In Finland, the local supervisory authority is the

Tietosuojavaltuutettu / Data Protection Ombudsman. Contact details provided below. In case you reside in other EU member state you may contact your local supervisory authority. You may find exhaustive list of supervisory authorities as well as their contact details from European Data Protection Board website.

Tietosuojavaltuutetun toimisto / The Office of Data Protection Ombudsman

Visiting address: Lintulahdenkuja 4, 00530 Helsinki, Finland

Mailing address: PL 800, 00531 Helsinki, Finland

Telephone: +358295666700

Email: tietosuoja@om.fi