

# PRIVACY POLICY

Updated: 17 Mar 2022

deidei Oy (“**deidei**” or “**we**”) provides Diversity, Equity, and Inclusion and Marketing and Communication services for organisations.

This Privacy Policy may be updated from time to time in order to reflect the changes in data processing practices or otherwise. You can find the current version on our website.

This Privacy Policy applies to the processing of Personal Data carried out by deidei as a data controller. Should you have any questions relating to the processing of your Personal Data, or should you wish to use your rights as a data subject, please contact us on the addressees set out below.

## 1. Data Controller

deidei Oy  
Annankatu 16 B 44  
FI-00120 Helsinki  
Finland  
Business ID: 3187103-6  
[hello@deidei.co](mailto:hello@deidei.co)

## 2. Data Protection Office

Nasim Selmani  
[nasim@deidei.co](mailto:nasim@deidei.co)

## 3. How we collect data

Your Personal Data we process for the purposes of this Privacy Policy is referred to as “**Personal Data**”. We primarily process Data (required and optional) which you provide us directly, via the contact form on our deidei’s webpage or otherwise. You are solely responsible for the content of your contact request. We also collect and process your Personal Data through any personal contacts, phone calls, or e-mail correspondence that you may have with us.

Examples of the data, but are not limited to, are

- basic information, such as your name, your contact information,
- all other information you may provide at any stage of the contact process, such as company name, title or LinkedIn profile.

- Survey data

## 4. How we process your data

We process your Personal Data based on multiple different legitimate grounds. This section describes the Personal Data we may process about you as well as the legal ground for the processing.

In case we process your Personal Data based on a consent you have given you may withdraw your consent at any time by notifying us and if the processing is based on our legitimate interest, we will weigh your interest for privacy against our interest in accordance with the data protection laws.

We process the Personal Data for several purposes:

### To process your contact request for advancing a future partnership with deidei

deidei processes your Personal Data to be able to process your contact request for a future partnership that we would provide services to. We need to process data to take steps prior to entering into a contract with you and may also need to process your data to enter into a contract with you. Processing under this section is based on the GDPR Article 6(1)f and 6(1)b

### To process data in relation to surveys

deidei may process your Personal Data to be able to perform surveys for its clients. These surveys by default shall not contain personally identifiable data but in case you would be able to be identifier from the data we have added information regarding the data processing. We always aim to remove any data which identify individual from the survey results. Processing under this section is based on consent referred in the GDPR Article 6(1)b.

### For quality improvement and trend analysis

We may also process information about your Personal Data for running analytics and developing our services and future recruitment. When possible, we will do this using only aggregated, non-personally identifiable data. In case the analytical data includes Personal Data we will ask your explicit consent for the data processing. Processing under this section is based on the GDPR Article 6(1)a

### For our legal obligations

deidei processes your Personal Data in some cases to ensure that we comply with legal obligations. Processing under this section is based on the GDPR Article 6(1)c

#### For claims handling and legal processes

deidei may process Personal Data to respond to and defend against legal claims. Processing under this section is based on the GDPR Article 6(1)c

## 5. How we may share your 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 authorised data processors

We may provide your Personal Data to authorised data processors who perform services for us (including, for instance, data storage, accounting, payment, 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 our legitimate interest.

When your Personal Data is processed by third parties as data processors on behalf of deidei, deidei has taken the appropriate contractual and organisational measures to ensure that your data are processed exclusively for the purposes specified in this Privacy Policy and in accordance with all applicable laws and regulations and subject to our instructions and appropriate obligations of confidentiality and security measures.

#### For legal reasons and legal processes

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 deidei, 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 deidei 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 deidei when we have your explicit consent to do so. You have the right to withdraw this consent at all times.

## 6. Data transfers to the third countries

We use service providers in several geographical locations. As such, we and our service providers may transfer your Personal Data to, or access it in, jurisdictions outside the EU/EEA.

We will take steps to ensure that your Personal Data receives an adequate level of protection in the jurisdictions in which they are 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.

More information regarding the transfers of Personal Data may be obtained by contacting us on any of the addresses indicated above

## 7. How long we will store your data

deidei does not store your Personal Data longer than is legally permitted and necessary for the purposes of this Privacy Policy.

Most Personal Data will be deleted in 12 months from the date of completion of the partnership. 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 performed by us is always removed after the survey has been completed and the report of the survey has been formed. By latest all survey related data is removed after 3 months from the closure of the survey.

## 8. Your rights

### Right to access

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

The above-mentioned rights may be used by sending an e-mail or a letter to us on the addresses set out above. If appropriate we recommend attaching the request with sufficient information through which we would be able to identify you. Please note that we may reject requests that are unreasonably repetitive, excessive, or manifestly unfounded.

## 9. Direct marketing

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

## 10. 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 occurs that is likely to have negative effects on your privacy, 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.

## 11. Data processors

We use in a regular basis the following data processors:

Data processor name	Privacy documentation
Google Ireland Limited	<a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a>

## 12. 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 Data Protection Ombudsman which contact details you find down below. In case you reside in other 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](#).

### Data Protection Ombudsman

Lintulahdenkuja 4  
FI-00530 Helsinki  
Finland

Tel. +358 29 566 6700  
[tietosuoja@om.fi](mailto:tietosuoja@om.fi)