

<b>1 Data Controller</b>	Name SYKLI Environmental College Address Kaartokatu 2, 11100 Riihimäki, Finland Phone +358 50 529 6428  Email info@sykli.fi  Internet www.sykli.fi
<b>2 Contact Person for Registry Matters</b>	Jari Heiskanen
<b>3 Name of the Register</b>	<b>Fennoa</b> – Financial Administration Register, which contains customer and contact person information.
<b>4 Purpose of Personal Data Processing</b>	Personal data is processed for the management and handling of business-related tasks such as contracts, purchase and sales invoicing, and customer transactions.
<b>5 Content of the Register</b>	Customer company contact details: Name, business ID and other contact details, company type, revenue size, staff class, number of locations, year of establishment, industry classification.  Contact details of customer company representatives: Name, title, address, phone number, email address.  Information about the contact between the customer and Sykli, the customer's needs, ordered services, their delivery and invoicing.  The individual has the right to refuse the processing of their data for direct advertising or other marketing purposes.
<b>6 Regular Data Sources</b>	Fonecta Finder, Asiakastieto, personal contacts of Sykli staff, and from the registrant themselves.
<b>7 Regular Disclosures of Information</b>	The information in the register is not disclosed to outsiders.
<b>8 Transfer of Data Outside the EU or EEA</b>	Information is not disclosed.
<b>9 Principles of Register Protection</b>	a) Manual material – None  b) Computer-processed data  - The register is protected with a username, password, and firewall. - Only individuals appointed to the task have access to the user register. - Users of the register are under an obligation of confidentiality.
<b>10 Date and Author of the Register Description</b>	Date 23.3.2022. Author Harri Lehtonen



## **Register Description**

### **Data Protection Act**

### **(1050/2018)**

#### Instructions for Completing the Register Description

Read the instructions before filling out the register description. Use the annex if necessary.

1. The data controller refers to a person, entity, or foundation for whose use the personal register is established and who has the right to determine its use. The data controller can be, for example, a company, an authority, or an association, not a specific department, employee, or IT company technically maintaining the register.

If the data controller does not have a place of operation within the European Union, but uses equipment located in Finland for processing personal data for purposes other than just transfer through this area, the data controller must appoint a representative in Finland. This representative, along with their contact details, should be listed next to the data controller's name in section 1.

2. The contact person can be addressed with various inquiries concerning the processing of personal data.
3. The personal register is given a name that indicates its purpose of use (for example, customer register, personnel administration register).
4. The purpose of processing personal data explains for which task of the data controller the personal register has been established. Personal data may be processed, for example, for the management of a customer relationship, service relationship, or membership. This section can mention the legal provision on which the processing of personal data is based (e.g., Personal Data Act section 8 or chapter 4 or a provision of a special law). If the processing of personal data has been outsourced, this can be mentioned in this section.
5. The description includes the data or types of data that can be stored about the registrant. Personal identification information is detailed (e.g., name, date of birth, and contact details). Otherwise, a description of the types of data or groups may suffice (e.g., information about services ordered by the customer, their delivery, and invoicing). Data can be grouped using subheadings.
6. A description of where the data stored in the register regularly comes from. Data can accumulate in the data controller's own operations, be obtained from the registrant themselves, or as transfers from other personal registers. If data is obtained as a transfer from elsewhere, state the basis of the transfer. The basis could be, for example, the registrant's consent or a legal provision. The Personal Data Act does not require the notification of regular data sources, but it is appropriate for the description of personal data processing.
7. Are personal data regularly disclosed? If data is disclosed, to whom it is disclosed. Also, describe what data is disclosed and the basis for the disclosure. The basis for disclosure can be the registrant's consent or a legal provision. Providing information to the assignee in situations involving the outsourcing of personal data processing is not a disclosure of personal data. Mention outsourcing in section 4 of the description.
8. Are personal data transferred outside the European Union or the European Economic Area?
9. The protection of manual material can be described, for example, by mentioning storage in a locked space. For computer-processed data, it is stated how the data is protected from outsiders and how their use rights are limited within the organization. Describe the general principles of protection. Do not disclose details that could compromise data security. It is also good to note in this section if the personal data stored in the register is designated as confidential.
10. The date of preparation of the register description and the name of the author.