

Privacy Policy

This is the privacy policy and data processing addendum of C-Soft Oy (Finnish business ID: 0678742-2). This document is compliant with the Finnish Personal Data Act (10 and 24 §) and the General Data Protection Regulation (GDPR) of the European Union. Created on 15th of May 2018 and last update was made on 20th of May 2018.

1. Data controller

C-Soft Oy
Kylänpuolentie 197
FI-90460 Oulunsalo, FINLAND

+358 8 415 415 44
admin@c-soft.net

2. The representative of the data controller

Oikarinen Kasper
+358 50 381 7941 / +46 72 363 3524
kasper@c-soft.net

3. Types of data collection

Client database

4. Legal basis and purpose for processing of data

The legal basis for the processing of your personal data is:

- your consent, that you may have provided when registering as a client
- conclusion and performance of contractual arrangements and obligations between the Data Controller and the User
- pursuance of legitimate interests of the Data Controller
- the fulfillment of legal obligations

The purposes of the data processing are:

- to keep in touch with our clients
- account set up and administration
- providing services
- legal obligations
- marketing
- invoicing and billing

We do not process your personal data for the purposes of automated decision-making or profiling.

5. Data collection

The data we collect are the first and last name, company/organization, contact details (incl. postal address, state, country, phone number and email address), IP address of the internet connection, device and browser type (user agent), purchase details and history and the changes made to purchased services, as well as billing details.

These data are retained for the duration of the customer relationship. As an exception billing and invoicing details are retained for a period of six (6) years after the termination of the customer relationship, since the data controller has a legal obligation to retain accounting data for this period.

6. Data sources

The data collected are generally obtained from the registration form the client fills in while registering as a client. The data may also be collected via email, phone calls, social media, as well as from contracts, meetings and from other situations where the client intentionally provides us with his/her personal data.

7. Data sharing and transfer outside the EU/EEA

The data controller may regularly release personal data to the following recipients **inside the EU/EEA**:V

- Merit Software Oy (Finland)

- **Purpose of data sharing:** billing and accounting

- **Data shared:** first and last name, name of organization, postal address (incl. state and country), email address, phone number, language, currency, purchase history

- Stripe Payments Europe (Ireland)

- **Purpose of data sharing:** veloitus (korttimaksujen veloitus ja SEPA-suoraveloitukset)
- **Data shared:** first and last name, email address, credit/debit card number, its expiration date and CVC code, IBAN account number and the name of its account holder, device and browser type (user agent) and the IP address of the internet connection

Data may also be regularly transferred outside the EU and EEA by the data controller.

Data recipients outside the EU and EEA, to whom data may be transferred to:

- tawk.to Inc. (United States of America)

- **Purpose of data sharing:** communication with the client (live chat)
- **Data shared:** first and last name, email address, language, browsing history at the website of the data controller, device and browser type (user agent) and the IP address of the internet connection
- **Documentation of appropriate safety measures:** The data controller has self-certified itself to the Privacy Shield data protection settlement between the European Union and the United States. <https://www.tawk.to/data-protection/gdpr/>

- Stripe Inc. (United States of America)

- **Purpose of data sharing:** billing (credit card and SEPA direct debit payments)
- **Data shared:** first and last name, email address, credit/debit card number, its expiration date and CVC code, IBAN account number and the name of its account holder, device and browser type (user agent) and the IP address of the internet connection
- **Documentation of appropriate safety measures:** The data controller has self-certified itself to the Privacy Shield data protection settlement between the European Union and the United States. <https://stripe.com/privacy-shield-policy>

8. Principles of data protection

The data processing is always conducted carefully and processing conducted using data systems is secured appropriately. When storing personal data on servers, the physical and digital security of such data is taken ensured by data encryption and access control, to mention a few. The data controller insures that all stored personal data, login details to servers and other critical information are handled confidentially and only by those employees of the data controller, whose job requires it. When transferring personal data from one server to another or to a third country, the data controller will ensure the transfer is conducted over a secure and encrypted connection.

9. Rights of Users

- **Right to access.** Any client has the right to get a confirmation as to whether or not we are processing the data of the User. In cases where we do process the User's personal data, we will inform the User what categories of personal data we process regarding him/her, the purposes of the processing, the categories of recipients to whom personal data have been or will be disclosed and the retention period or criteria to determine that period.
- **Right to withdraw consent.** In case our processing is based on a consent granted by the User, the User may withdraw his/her consent at any time by contacting us. Withdrawing a consent may lead to fewer possibilities to use our Services.
- **Right to rectification.** Any User has the right to rectify or complete inaccurate or incomplete personal data we store about the User.
- **Right to object.** In case our processing is based on our legitimate interest to run, maintain and develop our business, any User has the right to object at any time to our processing. We shall then no longer process User's personal data unless for the provision of our Services or if we demonstrate other compelling legitimate grounds for our processing that override User's interests, rights and freedoms or for legal claims. Notwithstanding any consent granted beforehand for direct marketing purposes, any User has the right to prohibit us from using his/her personal data for direct marketing purposes, by contacting us or by using the functionalities of the Services or unsubscribe possibilities in connection with our direct marketing messages.
- **Right to restriction of processing.** Any User has the right to obtain from us restriction of processing of User's personal data, as foreseen by applicable data protection law, e.g. to allow our verification of accuracy of personal data after User's contesting of accuracy or to prevent us from erasing personal data when personal data are no longer necessary for the purposes but still required for User's legal claims or when our processing is unlawful. Restriction of processing may lead to fewer possibilities to use our Services.
- **Right to data portability.** Any User has the right to receive User's personal data from us in a structured, commonly used and machine-readable format and to independently transmit those data to a third party, in case our processing is based on User's consent and carried out by automated means.
- **Right to erasure.** Any User has the right to have personal data we process about the User erased from our systems if the personal data are no longer necessary for the related purposes, if we have unlawfully processed the personal data or if the User objects to processing for direct marketing. Any User furthermore has the right to erasure if the User withdraws consent or objects to our processing as meant above, unless we have a legitimate ground to not erase the data. We may not immediately be able to erase all residual copies from our servers and backup systems after the active data have been erased. Such copies shall be erased as soon as reasonably possible.

To exercise any of the above mentioned rights, the User should contact the data controller, preferably via email at support (at) c-soft.net. The data controller will answer within thirty (30) days.

11. The data controller as a data processor

When selling domain registration services, the data controller is instead the organization managing the domain name extension (TLD), the so-called domain registry. In such situations the data controller mentioned in this document acts as a data processor. While registering or transferring a domain name, or changing the details of the domain registrant, the following personal data are collected:

- first and last name
- organization name
- postal address (incl. state and country)
- phone number

- email address

- any other additional details required by the domain registry / acting data controller, such as social security number or birthdate.

The above mentioned data may be shared with a domain registry within the EU/EEA or transferred to a domain registry in a third country. The details of the domain registries and its privacy rating is written on the information page of each Top-Level domain at <https://nordname.com/tld/com>, where "com" is to be replaced by the applicable Top-Level domain. On this information page we mention the name of the domain registry (acting data controller), the country it is located in, and its privacy rating that explains whether the country of the domain registry, or the registry otherwise, provides adequate data protection for the personal data of the data subject. In cases where no adequate data protections are in place or they can not be guaranteed, C-Soft Oy will require an explicit consent from the User in order to handle the order since the User's data protection rights may not be respected.