

Attachment 221en. / DATA PROTECTION POLICY ENYMIND PRODUCTION OY

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1 Registrar

1. Enymind Production Oy (latter Company)
Postal address: Kekkolantie 14 C 19, 40520 Jyväskylä, Finland
Email address: support at enymind.fi

2 Registry officer

1. Juho Tykkälä
Email address: juho.tykkala at enymind.fi

3 Data privacy officer

1. Juho Tykkälä
Email address: juho.tykkala at enymind.fi

4 Registry name

1. Enymind Oy customer and result information system

5 The purpose of data collection and processing

1. Customer information system maintains the information necessary for the customer relationship between the Company and the Customer. Information stored in the customer information system is only disclosed to the Company's representatives using their own personal user accounts. The information is used for customer relationship management, customer communication and marketing.
2. Result information system stores the participant and result information of the Customer's events which data is submitted by the Customer itself. All data is disclosed publicly because of the nature of the system. All data is publicly disclosed without any identity being checked at the time of accessing data.
3. EU citizens has the right under Article 18 of the GDPR to prohibit or restrict Company from processing data about herself/himself concerning direct email contacting, direct marketing, as well as market and opinion polls, or otherwise prohibit the usage of stored data if legality of this stored data or processing actions are questionable.

GDPR Article 18

6 *Data content of the customer information system*

1. Customer information
 1. Customer company name or association name
 2. Customer company VAT number or association national registration number
 3. Unique customer identifier
 4. Adding date and time of customer information
 5. Customer's billing address
 1. Street address, Postal number, Post office, Country
 6. Customer's shipping address
 1. Street address, Postal number, Post office, Country
 7. Per-customer user name
 8. Per-customer password
 9. Predicted end date and time of customer agreement
2. Customer's contact person(s)
 1. Contact person first name and last name
 2. Contact person phone number
 3. Contact person email address
 4. Adding date and time of contact person information
3. Data gathered in customer support situations
 1. Written conversations occurred between Company and Customer including date and time of the conversation
 2. Order data, Shipping data, Invoicing data
4. Free-form explanation with date and time about limitations or prohibition requested by the Customer within the scope and rights described in GDPR Article 18.

7 *Data content of the result information system*

1. Event data
 1. Event name
 2. Event date and time
 3. Event round data
 1. Round(s) name
 2. Round(s) date and time
2. Required information considering network transfer of event data
 1. IP-address of the sender of event data over network
 2. Date and time of the data sent
3. Event participant data
 1. Unique participant identifier
 2. Participant number
 3. Participant's information (depending on event data sender)
 1. Probably one or more; Nickname, First name, Last name, Team name
 4. Participant's club
 5. Participant's sport equipment model and type
 6. Name information of participant's sponsors
4. Participant result data gained during the event
 1. Participant classification
 2. Participant's per-round result and end-result
 1. Probably one or more; Lap time, Total time, Points

8 Sources of data

1. The customer information is provided by the Customer itself at the time the contract is made between Company and Customer is the main source of data in the customer information system. Before the contract is made, the customer information will be checked by the Company from the information system maintained by the National Board of Patents and Registers of Finland and supplemented, if necessary, by the information available on this system but only with extent of what has been described in this policy.
2. Data sources for the result information system is the event and result data provided by the Customers itself. The company will not process any data without Customer's explicit consent. The Customer is always the active party in delivering the result data into system. In addition to this the information necessary for the operation of the system is collected as described in this policy.

9 Provision of data and transfer of data

1. The customer information system shall not disclose information to third parties. Data may be transferred outside the European Union or the European Economic Area within the limits of the GDPR.
2. The data stored in result information system is publicly available without user authentication for all parties connected to the public Internet.

10 Security

1. Systems covered by this policy; the customer information system and the result information system are logically separated at the network level. These two logical networks are protected against both external and internal network connections by a firewall that is set to only pass through the connections that are relevant to the operation of the system. The result information system does not have a direct access to the customer information system. All the required data between these two systems are passed passively by storing information on the storage volume in the restricted network area of the other system from where the other system picks it as needed. The passive data transfer and storage processing only covers the transfer of essential data such as the validity and presence of the Customer contract required by the result information system. Other information of the customer information system is not available to the result information system.
2. System users do not have the possibility to set their own personalized passwords in the system or part of the system. A person's password is generated using a crypto-analytically sustained pseudo-random number generator during the account creation or when the user requests password reset. The generated password is stored in the system in salted and hashed format and can not be reverted back to its original form. User authentication is done by converting the password entered by the user to the hashed format and comparing it to the corresponding format stored in the system.
3. Personal data stored in a customer information system shall be disclosed solely on the basis GDPR which is possible, for example, by a person's own request or by a request of a legal authoritative.
4. Only representatives of the Company have access to the customer information system. Each company representative is identified by a personal user name and password when processing the stored data. In a situation where data stored in customer information system is processed over a data network the network traffic is encrypted using a TLS 1.2 protocol or equivalent using a crypto-analytically up-to-date and durable encryption methods.
5. Data backups of the customer information system are stored in encrypted format using crypto-analytically up-to-date and durable encryption methods.
6. The key management of the encryption methods used is hardened with HSM-system which is stored in physically secure and locked place.

11 Right to data review

1. Every EU citizen who has data stored in the registers defined in this policy has the right to know after providing the necessary information what data about him/her has been stored in the register or that there is no information about her/him in the register.
2. A person may on a separate request order the information by sending a written and signed order to the postal address of the Registrar mentioned in this policy.
3. The necessary information for the purpose of completing a data search inside the register and to send a answer back to sender are: first and last name, postal address, postal code, postal address. The answer is replied back to the postal address provided by the sender of the order. The response time is one month. The material will be provided on a separate request in a machine readable format allowing it to be transferred to another register.

GDPR 12.-22. Articles

12 Right to data correction or removal

1. If EU citizen whose data is stored in the register becomes aware of the fact that the data is incorrect, he or she has the right to have his or her data corrected or removed from that register.
2. A person may on a separate request order his or her data to be corrected or removed by sending a written and signed order to the postal address of the Registrar mentioned in this policy.
3. The necessary information for the purpose of completing a data search inside the register and correcting or removing data and to send a answer back to sender are: first and last name, postal address, postal code, postal address, and breakdown of corrected data or a breakdown of information that a person wants to get removed from the registry. The information about order completion is replied back to the postal address provided by the sender of the order. The response time is one month.

GDPR 12.-22. Articles

13 Prohibiting data storage to result information system

1. Due to the public nature of the result information system that is outlined in this policy the Company is not capable with reasonable efforts to permanently prevent the storage of data of a single person to the result information system. In a situation where a person feels that the result information system has stored incorrect data already or if any data is supposed to be deleted he/she is obliged to send a written and signed order to correct or remove data to the postal address of the Registrar mentioned in this policy. The response time is one month. Section 12. of this policy describes rights of removal in more detail.
2. In the situation where a person does not wish to have hers/his data stored in the result information system in the future the person is obliged to directly contact the organizer of the event where he/she is about to participate so prior actions can took a place to prevent data storage to the result information system.

GDPR 12.-22. Articles

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