

# INFORMATION NOTICE

## Record of Processing Activities

**General Data Protection Regulation (2016/679),  
Articles 13, 14 and 30**

**Date of drafting: October 12, 2018**

We may update or revise this Information Notice at any time, with any notice to you as may be required under applicable law. Your right to data portability and/or restriction of processing, if applicable, will become applicable as of May 25th, 2018.

<b>1. Controller / Company</b>	Orion Diagnostica Oy (Company Identification Number: 1855216-1) Koivu-Mankkaan tie 6B 02200 Espoo Finland Tel. 010 4261
<b>2. The person in charge / contact person</b>	Katja Skogman Orion Diagnostica Koivu-Mankkaan tie 6B 02200 Espoo Tel. 010 4261 katja.skogman@oriondiagnostica.fi  Contact details of the Data Protection Officer: Minna Torkko e-mail: dataprotection@oriondiagnostica.fi
<b>3. Name of the data file</b>	Customer relationship management system (CRM) of Orion Diagnostica
<b>4. The purpose for processing the personal data / recipients (or categories of recipients) of personal data / the legal basis for processing the personal data</b>	<p>The purpose for processing the personal data in this data file is to enable the controller to maintain customer services, develop, maintain, administer and monitor client relationships and to otherwise create and develop its operations, products and services, including creating a customer profile and profiling (booking, performing and registering sales promotion events of medical devices; circulating information regarding medical devices.)</p> <p>We may share your information with third parties, such as those who assist us by performing technical operations such as data storage and hosting. If ownership or control of Orion Diagnostica or all or any part of our products, services or assets changes, we may transfer your personal data to any new owner, successor or assignee. Orion Diagnostica Oy may disclose information to its authorised distributors and business partners to facilitate the delivery of its products and services. Orion Diagnostica Oy will not otherwise disclose the collected data for commercial purposes outside the Orion Group.</p> <p>The legal basis for processing of the personal data is legitimate interests of the controller or a third party / administration of the client relationship (EU General Data Protection Regulation Article 6.1.f) . We only process personal data based on our legitimate interests, in case we have deemed, based on the balancing of interest test, that the rights and interests of the data subject will not override our legitimate interest.</p>

<b>5. Content of the data file</b>	<p>The following data is collected:</p> <ul style="list-style-type: none"> <li>– Name, phone number and email address of the customer, company or other organisation and customer’s position in the company or organisation</li> <li>– instrument serial number/s in use, products in use, information on products and services in use, information of training sessions provided to customers</li> <li>– information on the customer’s geographical location and domicile, brand and type of the customer’s internet browser, customer’s current IP address</li> <li>– customer feedback, queries relating to the customer.</li> </ul>
<b>6. Source of information</b>	<p>Information is collected by Orion Diagnostica’s personnel or the customer enters the data about himself/herself on the Orion Diagnostica internet site.</p>
<b>7. Destinations of disclosed data and whether the data is transferred to countries outside the the European Union or the European Economic Area</b>	<p>Personal data from the data file is transferred both to countries of the European Union or the European Economic Area (“EEA”), as well as to countries outside of the EEA, where the level of data protection may not be deemed adequate by the European Commission.</p>
<b>8. Protection of the transferred personal data</b>	<p>The personal data being transferred outside of the European Union or the European Economic Area is protected by the signing of the Standard Contractual Clauses by the controller and the processor(s).</p> <p>The data subject may request a copy of the Standard Contractual Clauses by contacting the representative of the controller named under section 2. hereof.</p>
<b>9. Retention period of the personal data</b>	<p>The data files are periodically updated to include only data which is relevant for the purpose of processing.</p>
<b>10. The principles how the data file is secured</b>	<p>A. Manual data file</p> <p>The manual data shall be stored in an area with restricted access, available only for the authorized persons.</p> <p>B. Electronic information</p> <p>The data file is located on a server in a private hosting environment. The application is used via a secure https connection. The data shall be stored in system with restricted password protected access, available only for the authorized persons who need the information based on their role. Only an authorized user of the data file can create new users and maintain user information.</p>
<b>11. Right of access</b>	<p>The data subject shall have the right of access, after having supplied sufficient search criteria, to the data on himself/herself in the personal data file, or to a notice that the file contains no such data. The controller shall at the same time provide the data subject with information of the sources of data in the file, on the uses for the data in the file and the destinations of disclosed data.</p>

	<p>The data subject who wishes to have access to the data on himself/herself, as referred to above, shall make a request to this effect to the person in charge at controller by a personally signed or otherwise comparably verified document.</p>
<p><b>12. Right to object to processing</b></p>	<p>In case the legal basis for processing the personal data is the legitimate interests of the controller, the data subject has the right to object to processing on grounds relating to his or her particular situation.</p> <p>In case the data subject wishes to use its above-mentioned rights, he or she shall make a request to this effect to the person in charge at the data controller by a personally signed or otherwise comparably verified document in writing to the representative of the data controller named under section 2. hereinabove.</p>
<p><b>13. Rectification, restriction of processing and erasure</b></p>	<p>The data controller shall, on its own initiative or at the request of the data subject, without undue delay rectify, erase or supplement personal data contained in its personal data file if it is erroneous, unnecessary, incomplete or obsolete as regards the purpose of the processing. The controller shall also prevent the dissemination of such data, if this could compromise the protection of the privacy of the data subject or his/her rights.</p> <p>The data subject shall have the right to obtain from the controller restriction of processing, in case the data subject has contested the accuracy of the processed personal data, if the data subject has claimed that the processing is unlawful and the data subject has opposed the erasure of the personal data and has requested the restriction of their use instead; if the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims; or if the data subject has objected to processing pursuant to the EU General Data Protection Regulation pending the verification whether the legitimate grounds of the controller override those of the data subject. Where processing has been restricted based on the above grounds, the data subject who has obtained restriction of processing shall be informed by the controller before the restriction of processing is lifted.</p> <p>If the data controller refuses the request of the data subject of the rectification of an error, a written certificate to this effect shall be issued. The certificate shall also mention the reasons for the refusal. In this event, the data subject may bring the matter to the attention of the Data Protection Ombudsman.</p> <p>The data controller shall notify the rectification to the recipients to whom the data have been disclosed and to the source of the erroneous personal data. However, there is no duty of notification if this is impossible or unreasonably difficult.</p> <p>Requests for rectification shall be made by contacting the representative of the data controller named under section 2. hereof.</p>