Data protection description of Balentor Ltd.
CUSTOMER REGISTER
Date: 5th of October 2022

1. Controller

Balentor Ltd. and the companies in the same group (hereafter Balentor), Business ID 0933696-9
Address: Väinönkatu 38 C, FI-40100 Jyväskylä.

2. Contact person for register queries

Anne Mero, Chief Operating Officer, anne.mero@balentor.fi
Balentor has concluded that it does not have to name a data protection officer.

3. Name of the register

Balentor Ltd.'s customer register.

4. Registration data handlers

Our service providers dealing with personal data and / or having technical access to the systems are Administer Ltd., AtMentor Ltd., Extended DiSC Ltd., HubSpot Inc., Microsoft Corporation, Modular Learning Processes Ltd., Questback Ltd., SHL Finland, and Sulava Ltd.

5. The purpose of processing personal data

Personal data is used to provide Balentor´s coaching and development services for the customers and to implement analyses, studies, evaluations and surveys as well as report the results.

6. Data content

Information stored on the data subject may include:

- Contact information, for example, first name, surname, e-mail address, telephone number, address and language
- Information related to work role: position and role in the company, work experience from the field / company, business area/unit/department/team
- Contact and background information of the employer
- Participation and user data regarding the development programs or other events, products and services provided by Balentor
- Customer relationship information (e.g. contacts, appointments, etc.)
- Possible permissions and consents
- Potential other information collected on the person´s consent (e.g. dietary information regarding events)

7. Storage time of personal data

Balentor stores personal data in the customer register until the customer relationship between the data subject and Balentor is considered to have ended. The ending time is determined from the last service contact of the data subject which is added 10 years.

8. Regular sources of information

Personal data information is received from the customer´s contact person or from the data subject him/herself.

9. Regular disclosure and transfer of personal data outside the European Union or the European Economic Area

Balentor uses personal information in the register and does not disclose it to third parties. The register will be maintained on servers located in the EU or in the European Economic Area. If the servers are located outside EU/EEA Balentor ensures that data transfers will be made according to the Privacy Shield Framework.

10. Description of the principles in which the data file has been protected

The customer register data is accessible and used only by Balentor´s employees who have the issued rights to do so to complete his/her work tasks. Access to the customer register data requires specified username and password. Balentor has a confidentiality agreement with employees.

11. The data subject´s right of access to the data (inspection right)

The data subject has the right to inspect personal data stored in Balentor´s customer register concerning him/herself and to obtain copies of them. The inspection request must be made in accordance with section 13 of this data protection description. The identity of the recipient is verified when disclosing the information.

12. The data subject´s right to demand rectification or deleting data, or restrict data processing

The controller, on his/her own initiative or at the request of the data subject rectifies, removes or completes the personal data of the register that is defective, unnecessary, incomplete or obsolete. To conduct the inspection and to correct the information, please contact the addresses in section 13.

13. Contacts

In all matters related to the processing of personal data and all situations regarding one's rights, the data subject should contact Balentor.

a) By post at the address:
   Balentor Ltd.
   Väinönkatu 38 C
   FI-40100 Jyväskylä

b) By sending an email from the address in Balentor's register to following e-mail address:
   info@balentor.fi

Balentor may, if necessary, request the data subject to specify his/her request in writing and the identity of the person may be verified before taking any other action.