



## PRIVACY POLICY

UPDATED MAY 2020

This is a privacy notice of M&T Yhtiöt Oy.

We respect your privacy and are determined to protect your personal data. The purpose of this privacy notice is to inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from). We'll also tell you about your privacy rights and how the data protection law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below.

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3. HOW WE COLLECT YOUR PERSONAL DATA
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## 1. WHO WE ARE AND IMPORTANT INFORMATION

This privacy notice aims to give you information on how we collect and process your personal data through your use of this website, including any data you may provide through this website when you book in a service.

This website is not intended for children and we do not knowingly collect data relating to children.

You must read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### Data controller(s)

M&T Yhtiöt Oy is the controller and responsible for your personal data.

Our contact details are:

[admin@fixwego.fi](mailto:admin@fixwego.fi)

+358 44573 5577

Urho Kekkosen katu 4-6E, 00100 Helsinki, Finland

For all data matters contact, please contact us on +358 44573 5577

### Third-party links outside of our control

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about

you. We do not control these third-party websites and are not responsible for their privacy statements.

When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 2. THE PERSONAL DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- Personal data such as name, address and contact information.
- Financial information, including account and transactional information
- Goods and services provided
- Pictures and/or videos associated with our service
- Online profile and social media information and activity, based on your interaction with us and our websites and applications
- We also may collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate our usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect your personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### 3. HOW WE COLLECT YOUR PERSONAL DATA

We use different methods to collect data from and about you including through:

FOR EXAMPLE,

- You may give us your Full name, Full address and contact details (e-mail address and mobile number) by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - Enquire about our services
  - Create an account on our website
  - Book our services
  - Subscribe to our service or publications
  - Request marketing to be sent to you
  - Interact with us on our website, applications, social media accounts
  - Reporting a problem with any of our services
  - Send feedback to us
  - Complete a survey/questionnaire we may ask from time to time

### 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances [PERSONALISE TO YOUR BUSINESS AS NEEDED]:

- Performance of Contract, this means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- Legitimate Interest, this means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- Comply with a legal or regulatory obligation this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

#### PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, with the legal bases we rely on to do so.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact (c) Address	Performance of a contract with you

#### Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you registered for a promotion and, in each case, you have not opted out of receiving that marketing.

### Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or e-mailing us at [admin@fixwego.fi](mailto:admin@fixwego.fi) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product or service experience or other transactions.

### Cookies

Cookies are small pieces of information that are stored by your browser on your computer's hard drive. Our cookies do not contain any personally identifying information. Most web browsers automatically accept cookies, but you can usually change your browser to prevent that. Even without accepting cookies, you can still use most of the features.

Our site uses cookies to ensure customers do not see the same advertisement or content repeatedly. We use cookies to deliver information specific to your interests.

You give this information when you request an estimate, access special offers or schedule service.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see <https://fixwego.fi/fixwego-cookies/>

## Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please email us at [admin@fixwego.fi](mailto:admin@fixwego.fi)

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5. WHO WE SHARE YOUR PERSONAL DATA WITH

We will only use and share your information where it is necessary for us to lawfully carry out our business activities. We want to ensure that you fully understand how your information may be used. We have described the purposes for which your information may be used in detail in paragraph 4.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### 5.1 Sharing with third parties

We will not share your information with anyone outside M&T Yhtiöt Oy except:

- a) where we have your permission;
- b) where required for your product or service;
- c) where we are required by law and by law enforcement agencies, judicial bodies, government entities, tax authorities or regulatory bodies around the world;

- d) with third parties where required by law to help recover funds that have entered your account as a result of a misdirected payment by such a third party;
- e) with third parties providing services to us, such as IT consultancy & support, market analysis, agents and subcontractors acting on our behalf.
- f) with debt collection agencies;
- g) with credit reference and fraud prevention agencies;
- h) with third-party guarantors or other companies that provide you with benefits or services (such as insurance cover) associated with your product or service;
- i) where required for a proposed sale, reorganisation, transfer, financial arrangement, asset disposal or other transaction relating to our business and/or assets held by our business;
- j) in anonymised form as part of statistics or other aggregated data shared with third parties; or
- k) where permitted by law, it is necessary for our legitimate interests or those of a third party, and it is not inconsistent with the purposes listed above.

5.2 In the event that any additional authorised users are added to your account, we may share information about the use of the account by any authorised user with all other authorised users.

5.3 fixwego will not share your information with third parties for their own marketing purposes without your permission.

## 6. INTERNATIONAL TRANSFERS

Information we collect may be transferred to, stored and processed in any country or territory where one or more of our affiliated companies or third party service providers are located or maintain facilities. While other territories may not have the same standards of data protection as those within your home country, we will continue to protect the personal information we transfer in accordance with this Privacy Policy.



## 7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers, including contact, identity, financial and transaction data for 5 years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see Your legal rights below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 9. YOUR LEGAL RIGHTS

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), where applicable gi.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to our processing of personal data, where applicable i.e. where processing is based on our legitimate interests (or in performance of a task in the public interest/exercise of official authority); direct marketing or processing for the purposes of scientific/historical research and statistics).

If you wish to exercise any of the rights set out above, please contact Customer Service +358 44 573 5577 or e-mail us at [admin@fixwego.fi](mailto:admin@fixwego.fi)

### What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to

receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

#### Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

#### 10. Changes to this notice and your duty to inform us of changes

This Version was last updated in April 2020. We are still working towards getting our systems ready for some of these changes.

Please keep us informed if your personal data changes during your relationship with us. It is important that the personal data we hold about you is accurate and current.

#### 11. Queries, requests or concerns

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact us:

M&T Yhtiöt Oy

Customer Service

Urho Kekkosen katu 4-6E, Helsinki 00100

Telephone: +358 44 573 5577

e-mail: [admin@fixwego.fi](mailto:admin@fixwego.fi)