

## 1 Purpose of processing and controller's instructions

This document contains the description of personal data processing activities and processing instructions and is an appendix to the personal data processing agreement and service description. Together with the service agreement between Elisa and the customer (hereinafter 'Service') and its appendices (hereinafter 'Agreement'), they constitute the controller's instructions to the personal data processor.

### **Service: Elisa Devices Service**

**Purpose of processing:** Elisa processes the customer's personal data in order to provide the Services in accordance with the Agreement.

## 2 Categories of data subjects

In the Service, Elisa may process the personal data of the following data subjects:

	Customer's customers
	Customer's end customers
X	Customer's employees
	Customer's potential employees
	Customer's suppliers
	Customer's potential suppliers
	Other, what?

## 3 Personal data type

In the Service, Elisa may process the following personal data:

X	Name
X	Contact information (address, phone number, email)
	Personal identity code
X	Information describing the customer relationship (customer ID, order history)
	Socio-demographic characteristics (e.g., age, gender)
	Financial information (e.g., contacts, invoices, offers, purchases, bank details)
X	Technical information generated by service use that can be connected to the person
	Communication traffic data (see Information Society Code)
	Location information
	Other, what?

## 4 Special categories of personal data

In the Service, Elisa may process the following special categories of personal data:

	Race or ethnic origin
	Political opinions
	Religious or philosophical beliefs
	Trade union membership
	Genetic data



	Biometric data
	Health data
	Data concerning a person's sex life and sexual orientation
	Special categories of personal data will not be processed

## 5 Location of processing and subcontractors

In the Service, personal data will be processed at the following locations:

	Only in Finland
	In the EU and EEA
X	In the EU and EEA and outside the EU and EEA

Transfer of personal data outside the EU and EEA is based on:

	European Commission's decision on data protection adequacy
X	European Commission's model contract clauses
	Data subject's consent
	Other, <i>what?</i>
	Personal data will not be transferred outside the EU and EEA

Elisa may use subcontractors to process personal data in the Service. The customer may request Elisa to provide a more detailed description of the subcontractors involved in the processing of personal data as well as on the locations of personal data processing.

If data is transferred outside the EU or EEA, Elisa will ensure with sufficient agreements and other measures that the data is transferred in accordance with the legislation.

## 6 Security of processing

Elisa takes account of the security of processing in all activities. Elisa ensures the security of processing using appropriate technology, security solutions, and related administrative means. These measures vary from service to service

## 7 Duration of processing

Elisa processes personal data only for the period required for the intended purpose of processing. When the provision of the processing-related services ends, Elisa will either delete or return the personal data within a reasonable period of time.

## 8 Controller's contact information

Company name	Elisa Oyj
Business ID:	0116510-6
Address	Ratavartijankatu 5, 00520 Helsinki
Data protection officer	<a href="mailto:tietosuojavastaava@elisa.fi">tietosuojavastaava@elisa.fi</a>



