

# **Rohjeta Advisors Oy – Register and Privacy Notice (GDPR 2025)**

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This privacy notice, prepared in accordance with the EU General Data Protection Regulation (GDPR), describes how Rohjeta Advisors Oy processes personal data in its customer and marketing activities and on its website.

## **1. Controller**

### **Rohjeta Advisors Oy**

Business ID: 2822045-1

Kansakoulukatu 3, 00100 Helsinki, Finland

## **2. Contact Person Responsible for the Register**

### **Nina Lepistö**

Email: [nina.lepisto@rohjeta.com](mailto:nina.lepisto@rohjeta.com)

Phone: +358 50 547 9038

## **3. Name of the Register**

Customer, contract and marketing register of Rohjeta Advisors Oy.

## **4. Purposes and Legal Bases for Processing Personal Data**

Personal data is processed for the following purposes in accordance with Article 6 of the GDPR:

### **Contract (Art. 6(1)(b))**

- Provision and delivery of services
- Invoicing and contract administration
- Management and maintenance of the customer relationship

### **Legal obligation (Art. 6(1)(c))**

- Compliance with accounting and tax-related statutory requirements

### **Legitimate interest (Art. 6(1)(f))**

- Customer communication
- Business and service development

- Website performance and security
- B2B marketing

### **Consent (Art. 6(1)(a))**

- Electronic direct marketing
- Non-essential cookies and analytics

## **5. Categories of Personal Data Processed**

### **Customer and contract data**

- Name, company/organization
- Contact details (address, email, phone number)
- Business ID and invoicing details
- Contract, order and project information
- Communication history

### **Marketing data**

- Name
- Company/organization
- Email address
- Marketing permissions and opt-out records

### **Website usage and technical data**

- IP address and general location data
- Data collected through cookies and similar technologies
- Website usage data (e.g., page views, session duration)
- Device and browser information

## **6. Sources of Personal Data**

- Information provided directly by the data subject
- Public sources
- Website analytics data

## **7. Recipients and Transfers of Personal Data**

Personal data may be disclosed or transferred to the following categories of recipients:

- Accounting and invoicing service providers
- Cloud and IT service providers

- CRM and marketing automation systems
- Analytics and website tools

All external service providers process personal data on behalf of the controller under a data processing agreement.

### **Transfers outside the EU/EEA**

Our primary service providers store cloud-based data within the EU.

If, in exceptional cases, a service provider is located outside the EU/EEA or processes data there, such transfers are carried out using GDPR-compliant safeguards:

- EU Standard Contractual Clauses (SCCs)
- EU-US Data Privacy Framework (where applicable)
- Other safeguards approved by the European Commission

### **8. Retention of Personal Data**

Personal data is retained only for as long as necessary for the purposes for which it was collected:

- Customer and contract data: 6 years from the last transaction (in accordance with accounting legislation)
- Marketing data: until the data subject withdraws consent or objects to processing

Data is deleted or anonymized when it is no longer needed.

### **9. Principles of Data Security**

Personal data is processed confidentially and protected through technical and organizational safeguards:

- Access control and restriction of user rights
- Encrypted connections and secure systems
- Logging and monitoring mechanisms
- Staff training on data protection
- Contractual obligations for processors and subcontractors

### **10. Rights of the Data Subject**

The data subject has the right to:

- Access their personal data
- Request rectification of inaccurate or incomplete data
- Request erasure of data (“right to be forgotten”)
- Request restriction of processing

- Receive their data in a structured, commonly used and machine-readable format (data portability)
  - Object to processing based on legitimate interest, including profiling
  - Withdraw consent at any time
  - Object to AI-assisted processing
  - Request human intervention instead of solely automated decision-making
- Requests are generally answered within one month.

## **11. Right to Lodge a Complaint**

The data subject has the right to lodge a complaint with the supervisory authority: Office of the Data Protection Ombudsman – [www.tietosuoja.fi](http://www.tietosuoja.fi)

## **12. Contact for Data Protection Matters**

Email: [nina.lepisto@rohjeta.com](mailto:nina.lepisto@rohjeta.com)