

13.6.2018

Privacy Notice

The Simeon Group and its affiliates respect your privacy. This privacy notice is to inform you about your right to retain your privacy and our commitment to protect your personal information.

Simeon is a Finnish company whose legal units, business processes, administrative structures and technical systems go beyond national borders. Simeon provides services to European private and public customers (Customers). Simeon's head office is located in Rajamäki. All Simeon Group companies are located in the EU / EEA area, so they are subject to European data protection laws and directives. Our Privacy Policy and Guidelines are based on the EU Privacy Policy 2016/679 and the countries' of operation Privacy Policy laws in force. At Simeon all major privacy protection decisions are made at Group level.

This notice is displayed on Kiitosimeon.fi website.

1. Scope and Approval

This Privacy Statement applies to all business processes and sites, domains, mobile solutions, cloud services, communities, Simeon branded sites, and services of Kiitosimeon Oy.

This notice tells Simeon's processing of data when Simeon determines the purpose and means of processing. In this sense Simeon is the data controller.

Personal information is information which can be used for a person to be identified, such as an address, email address, or phone number. We need to process your personal information so that we can serve you as a Customer. By providing us with your personal information, you agree to the terms and conditions of this Privacy Policy. If you do not agree to this, do not use any Simeon's websites and do not enter your personal information.

2. Whose information do we handle?

Simeon handles information from customers, contractors, subcontractors, contact person, users of our services, and potential new customers who contact us through Simeon sites or other channels.

In addition, we deal with the information of our Customers' Employees and other individuals whose records are operated by our Customers.

In this notice, subjects may be referred to as persons, you or registered.

3. Simeon as a registrar

If Kiitosimeon's subsidiary determines the purposes and methods of processing the data this subsidiary operates as the registrar. Simeon acts as a registrar for the personal data we collect from jobseekers, staff of a Customer who has or may have business relationship with Simeon, and persons who request information from us for themselves or for their employer. If you represent Simeon's Customer, your rights are the same as those of a private individual.

3.1 Why do we handle your personal information?

Related to customer relationship management, as well as to fulfil the commitments given to our customers Simeon asks for your information about you as customer's contact person or service user.

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Our goals:

- a) Provide quotations for customers or potential customers.
- b) Give information about services provided that are close related to the services already used by the Customer
- c) Provide services and support in an agreed manner with the Customer
- d) Improve our services and the quality of Simeon web pages
- e) Identify and prevent security threats, maintain systems, and fix errors
- f) To prevent abuse of our services
- g) Provide information that is commonly needed in our deliveries and customer relationship management
- h) Deal with customer orders, provide services and create invoice
- i) Enable payments of services purchased from Simeon

Handling of data for the purposes mentioned above (a-i) is necessary for customer relationship management. That's why Simeon doesn't ask for your permission to process your personal information. We don't foresee processing causing you any harm.

In addition, we collect data from drivers and contact persons for the following purposes:

- j) To manage access to web-based programs
- k) For communication either electronically or by telephone

If you are a job seeker, we collect your information for the following purposes:

- l) Analysing your skills and backgrounds
- m) Evaluating your opportunities as an employee of Simeon or as an employee of our Customer

Personal data is needed to grant access to some of our software and services as well as to the information you request.

3.2 What personal information are we dealing with?

This chapter describes the categories of personal data to be processed in section 3.1 Why do we deal you're your personal data? The specified points a-k and i-m.

Uses a-k

For example, Simeon can process your personal information:

Your contact details and Customer contact information, such as name, address, email address and phone number

Employee information, such as job assignment, status, professional preferences and interests

Feedback, comments and questions about Simeon as a supplier or service

We have photographs or videos that are described in our premises

Identify user information such as username and password

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As a registrar, Simeon will not handle your sensitive personal information

Your contact information, such as name, address, email address, and phone number

Your employment relationships, such as job assignments and employment relationships

Professional preferences and interests

Simeon's content, such as photos or videos

Summaries are generated based on the information you provide in your personal assessments

As a registrar, Simeon will not handle your sensitive personal information unless it is related to your personal assessment.

3.3 How do we collect your personal information?

In general, Simeon collects personal information directly from you. If your Customer Employee buys Simeon's services through a Simeon partner company, we can collect your information from that partner company.

In certain situations, we may collect your information from other permissible sources if you have given the party concerned permission to disclose your personal information to others. These sources may be third-party data gatherers, Simeon's marketing partners, public sources, or third-party social networks. Simeon is able to combine your personal information from a single source with other sources. Then we get a more comprehensive picture of you as a contact person, so we can serve you better and more individually.

3.4 Automatic data collection tools

Simeon does not collect information about your movement on the Simeon Web site

3.4.1 Cookies

Simeon's websites do not use cookies

3.5 How do we transfer your personal information?

The Simeon Group has several companies, so it is likely that the Customer will be in business relationship with several Simeon Group companies. It is important that we provide the best customer service and produce the most positive experiences. Therefore, companies belonging to the Simeon Group can share your information with each other so that we can get an overall view of the Customer's relationship with the Group's companies. The purpose is to make sure that you get the information you need when you need them and that Simeon will not contact you unnecessarily frequently.

Simeon will not disclose your personal information to third parties for marketing purposes without your permission.

As the recruitment selection process progresses, we will share information to recruiters.

Simeon may disclose your personal information to third parties for other purposes only as follows:

3.6.1 Business partners

Simeon may disclose your personal information to its partners if the business requires it. This can be done if, for example, you buy our services on behalf of your employer from one of our authorized partners.

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3.6.2 Authorities

Police and other authorities may require Simeon to disclose personal information in case of control, crime or accident investigations. In that case, Simeon will disclose the information only to the authorities it belongs to.

3.6.3 Acquisitions

If Simeon merges into another company or makes a deal, or if Simeon's business is wholly or partly sold, the acquiring party, as well as its and Simeon's consultants, have access to the information managed by Simeon's single account. They may in some cases be personal data. In this case, third parties will enter into a confidentiality agreement with Simeon, which also covers the disclosure of any personal data.

3.7 Your Rights

3.7.1 Right to Refuse marketing communications

You have the right to refuse to receive marketing communications from Simeon by contacting us at info@simeon.fi

If you refuse to receive marketing communications, you may still get administrative notifications from Simeon, such as order confirmations and notifications about your account transactions (for example, confirmations and notifications of password change).

3.7.2 Access to personal information and correction

You have the right to request a copy of your personal information. You can send us a request for that. We will respond to your request within 1 month of receipt of the request.

You also have the right to ask Simeon to correct the errors included in your personal information. If you have an account on Simeon, you can usually do this on your Simeon site in any of your Accounts or Profiles or Simeon cloud services. To manage a Simeon newsletter subscription, click the ti-link management link at the bottom of the messages you receive. You can also send us a request to correct your information.

3.7.3. Right to request removal of data

You have the right to request the deletion of your information if your processing is based on your consent and you wish to cancel your consent. You may also request the removal of your personal information if your personal information is no longer needed for the purposes for which they were collected or processed or if you have experienced that your personal information has been processed illegally and that no other legislation or official authority oblige to retain it:

3.7.4. Transferring data to another system

You have the right to receive personal information about you in machine-readable form and the right to transfer data to another registrar if your processing is based on your consent, or if your information is handled in order to enforce a contract you are involved in, or for making pre-contractual arrangements upon your request.

3.7.5. Right to appeal to the supervisory authority

If you feel that your rights have been infringed with regard to the processing of personal data, you have the right to file an appeal with the supervising authority

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3.8 Security and Data Retention

3.8.1 How do we protect your personal information?

Simeon wants to be trustworthy to you. Simeon is committed to preventing unauthorized access, disclosure and other inappropriate processing of your information. In addition, Simeon is committed to ensuring that information is used correctly to ensure security and secure usability. As part of our commitment, we use the necessary physical, technical and administrative methods to safeguard the information we collect and handle. Simeon has taken several steps to ensure data security:

Protected environment - Simeon stores your data in secure environments accessible only to employees of Simeon and subcontractors who need information in their work. In addition, Simeon adheres to generally accepted industry standards. Encrypting payment information

- Simeon uses encryption that complies with industry standard standards, for example, to protect confidential information such as credit card information sent over the Internet. Please note that these actions will not protect your personal information you share publicly, such as the information that you publish to a social community web site.

3.8.2 How long will we keep your personal information? Simeon will keep your personal information for as long as they are required for their intended use, such as answering questions, solving problems, or fulfilling statutory

4. Simeon's Data Protection

Simeon offers its customers a variety of services. These services involve processing of Customer data and possibly processing personal data. When acting as a Registry Controller, Simeon is required to provide technical and organizational information security measures to protect privacy on behalf of the Customer.

Simeon is required, as a keeper, to notify the authorities and / or data subjects of the violation or unauthorized disclosure of personal data as required by law.

As a data processor, Simeon will not process personal data in any other manner than what is authorized by the contract with the data controller.

For example, if the information has questions, comments or requirements regarding personal data processed by Simeon, they must be sent to the controller. As a data processor, Simeon will not disclose their personal data to the data subject if the controller has not provided instructions to do so. If a police or other authority requires the disclosure of personal data, Simeon asks them to turn to the controller and ask them to disclose the information.

Simeon provides non-public information about its internal systems and data processing routines to Customers and Partners upon request. This may depend on the terms of the confidentiality agreement.

5. Subcontractors and Exporting Personal Data

In certain cases, Simeon will entrust subcontractors with the processing of data. In this case, your data or Customer information may be exported outside the EU. These subcontractors are usually producers of cloud services or other IT services. If subcontractors are used, Simeon will make a Data Processing Agreement (DPA) with them in order to protect your privacy and to fulfil the commitments given to Customers.

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If we are processed outside the EU, we will ensure that DPA is based on EU standard contractual clauses or that the data importer has an EU / US Privacy Shield certification if it is located in the US. In this case, we will notify the customer of the export of the data.

6. Changes to this notice

If we make changes to the privacy statement, we will post the modified notice and change date here. We encourage you to read the announcement regularly. If we make any significant changes to our notice, and our privacy policy is substantially changed, we may also otherwise notify you, for example by sending an e-mail, by posting a notice on our Group site and / or social media page before the changes take effect.

This Privacy Statement was last updated on 15.6.2018.

7. Contact

We appreciate your opinion. If you have any comments or concerns about our privacy notice or if you are concerned about privacy or data usage or suspect that your privacy has been violated, please send an email to info@Simeon.fi. You can also send a letter to Kiitosimeon OY, Data Protection Manager, Yrityspuistontie2 05200 Rajamäki, Finland.

We will process your request or complaint with confidence. Our agents will contact you at your address. We strive to ensure that complaints are processed in a timely manner and as required.