

XPEDIO OY REGISTER DESCRIPTION

Date of Issue: March 17, 2025

1. Data Controller / Name of the Register

Xpedio Oy

Sinimäentie 8B, 02630 Espoo

Business ID: 2638801-5

2. Contact Person for Register Matters

Mirjami Sipponen-Damonte

CEO

mirjami.sipponen-damonte@xpedio.eu

3. Purpose of Data Processing

Xpedio Oy maintains customer and marketing registers. The purpose of processing personal data includes:

- Management of customer relationships and business interactions
- Provision and development of services
- Marketing, customer communication, and information sharing
- Compliance with legal obligations

The processing of personal data is based on a contract, customer relationship, consent, or legitimate interest.

4. Data Content of the Register

The register may include the following data:

- **Basic information:** Name, contact details (email, phone number, address).
- **Work-related information:** Job title, organization, team, business unit.
- **Customer relationship data:** Service usage, meetings, communications, consents.
- **Event participation data:** Participation in Xpedio's programs or events.

- **Technical data:** Information collected through cookies and analytics tools about website usage.

5. Data Retention Period

Personal data is retained only as long as necessary to fulfill the intended purpose. Retention periods are as follows:

- **Customer data:** 10 years from the last customer interaction
- **Marketing register data:** 5 years or until the data subject withdraws consent
- **Website visitor data (Google Analytics):** 26 months

6. Regular Sources of Data

Personal data is primarily obtained from the data subject:

- Through customer relationships or service usage
- Via contact forms on our website
- From public sources (e.g., company registers, LinkedIn)

7. Disclosure and Transfer of Personal Data

Personal data is not sold or shared with third parties without the data subject's consent unless required by law. However, Xpedio uses trusted service providers who may have access to the data for technical maintenance and service provision. These include:

- **IT Services:** Planeetta Internet, Data Group Oy
- **Customer Management:** Pipedrive OÜ, Accountor Finago Oy
- **Marketing Services:** Creamailer
- **Cloud Services and Data Management:** Microsoft 365, Miro, SessionLab

Some service providers may be located outside the EU/EEA. In such cases, we ensure data protection through measures such as the European Commission's standard contractual clauses.

8. Data Protection Principles

Personal data is processed confidentially and only by authorized personnel.

- Data is protected with passwords, firewalls, and other security practices.

- Physical access to data is restricted and monitored.

9. Rights of the Data Subject

Data subjects have the following rights:

- **Right of access:** The right to know what personal data has been stored about them.
- **Right to rectification:** The right to request correction of inaccurate information.
- **Right to erasure ("right to be forgotten"):** The right to request the deletion of data if there is no longer a legal basis for processing.
- **Right to restrict processing:** The right to request the restriction of data processing in certain situations.
- **Right to object:** The right to object to direct marketing and the use of personal data based on legitimate interest.
- **Right to data portability:** The right to receive their personal data in an electronic format and transfer it to another controller.

To exercise these rights, the data subject must contact the person listed in section 10.

10. Contact Information and Right to Lodge a Complaint

For data protection inquiries, please contact:

Email: mirjami.sipponen-damonte@xpedio.eu

Postal Address: Xpedio Oy, Sinimäentie 8B, 02630 Espoo

If the data subject believes that their personal data is being processed in violation of data protection laws, they may file a complaint with the data protection authority (Office of the Data Protection Ombudsman, www.tietosuoja.fi).

11. Cookies and Website Tracking

Xpedio uses cookies to enhance user experience and analyze website usage.

- **Google Analytics:** Collects information about website usage (retention period: 26 months).
- **Social media plugins:** Enable content sharing on various platforms.

Users can disable cookies in their browser settings, but this may affect website functionality.

