

27.5.2024

UPTO GO MOBILE APPLICATION

Register description the register description referred to in section 10 of the personal data Act (523/1999)

Date of drafting: 15.5.224

Registry administrator:

Customer who acquired the service; company or corporation

Processor:

Upto Oy Business ID 3407841-2 Hämeentie 4 12300 Hämeenlinna Tel. +358 40 80947 55

Person handling register matters: Lauri Hänninen Tel. +358 40 19470 09 lauri.hanninen@upto.fi

Reason for keeping the register and purpose of use

The register enables companies and communities to use the Upto go mobile communications channel.

The registry processor may collect the log data related to the users of the contracted services that the registry processor needs to produce and develop the services, measure performance, for statistical purposes, troubleshoot problems and resolve abuse cases. If the data are used for statistical purposes, the registry processor is responsible for either anonymising or pseudonymising the data.

Information contained in the register

The register contains information specified by the registrant, such information may include, for example, contact details such as name, address, telephone numbers, e-mail addresses, registration information such as user name, name mark, password and any other unique identifier, mother tongue, customer



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relationship information such as title, and contacts, information related to the implementation of communications and information on the use of services, any authorisations and consents, any blocking information and any other information specified by the registrant. The Registry administrator is responsible for ensuring that it has the right to disclose personal data to the processor for the purpose of using the system.

Regular data sources

For each personal data that the registry administrator stores, the registry administrator is responsible for ensuring that the has the grounds for recording in accordance with data protection legislation and any necessary consents concerning the data subject.

Disclosure and storage of data

The data are not disclosed to third parties without the consent of the Registrar. The Registry administrator must have a justified need for the processing of data in accordance with data protection legislation and, when the user is a third party, that there is a written agreement between the said third party and the Registry administrator on the processing of data, if necessary. The processor is not obliged to check the facts on which the new user request is based. When the Registry administrator erases a user's data from the system, all information directed at the user is erased from the processor's system, with the exception of information that the Registry administrator has manually transferred to the archive, this information shall be erased by the Registry administrator. The data will remain in the backup after one (1) month deletion, after which the data will be irreversibly destroyed.

Registry Security

The data are collected in common databases protected by firewalls, passwords and other technical means. Only those employees who are entitled to process the data for their work are entitled to use the client data system. Each user has their own user ID and password in the system.

Right of inspection and rectification

The user has the right to check what information concerning him or her has been stored in the register. The data subject also has the right to request that incorrect information concerning him or her be rectified. A request for



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inspection and rectification can always be made by telephone, e-mail or post via the Registrar.

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Upto Oy

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