

**PRIVACY POLICY**  
**Finnish Personal Data Act (523/1999) 10§**

The date of issue:  
24.04.2018

<b>1 Registrar</b>	Name Smart Files Oy, business ID 1865576-9  Address Hämeenkatu 20 A, 33200 Tampere  Other contact information email@smartfiles.fi, Tel. 029 009 2599
<b>2 Contact person in matters concerning the privacy polic</b>	Name Hanna Kutschke  Address Hämeenkatu 20 A, 33200 Tampere  Other contact information hanna.kutschke@smartfiles.fi, Tel. 050 345 0768
<b>3 Name of the register</b>	SmartLogin user register
<b>4 Purpose of personal data processing</b>	The user has or has had a Smart Files user ID in a SmartLogin-login connected service. The personal information is used for production of services, customer service, customer login and customer identification.
<b>5 Information content of the register</b>	Every user is required to provide at least their first- and last name and email address. Users may provide other optional information to the register, such as their address and phone number.
<b>6 Regular information sources</b>	Information in the register is provided by the registered persons themselves upon registration and use of the service. The user invitation sender provides the e-mail of the person to be invited. Information can additionally be obtained through personal information systems that the user is using.
<b>7 Regular hand-over of information</b>	Personal information may be handed over to services that are connected with the SmartLogin-login service, where other users (administrators) may within their access rights have a look at this information.  Personal information will not be handed over to third parties.

<p><b>8 Transfer of information outside the European Union or the European</b></p>	<p>Personal information will not be handed over outside the EU or the European Economic Area. Users are still able to use the service outside the EU or the European Economic Area.</p>
<p><b>9 Protection principles</b></p>	<p>A Manual material The server, on which the register is saved, is located in a protected server room, where only authorized personnel have access through separate agreement.</p> <p>B Material handled with computing The registered is protected against third-party access using a two-way encryption method. Password seals constructed from the users passwords are saved into the database. The password seals are constructed using a safe method and protected using a unique string. User information is transferred between services using a two-way encryption method and HTTPS connection. Information is transferred between the server and the browser using a encrypted HTTPS connection.</p> <p>The register doesn't contain confidential information.</p>
<p><b>10 Inspection of the register information</b></p>	<p>The persons included in the register are entitled to check their information in the register. In order to do this, they must send a written, personally signed request to the registrar. The information will be delivered to the person included in the register in a separately agreed manner.</p>
<p><b>11 Right correct information</b></p>	<p>The persons included in the register are entitled to demand correction of an incorrect piece of information in the register. The correction request must be made in writing, and the piece of information to be corrected must be specified.</p>
<p><b>12 Other rights considering personal data processing</b></p>	<p>The persons included in the register are entitled to demand the removal of their own personal data from the register.</p>