

## **PRIVACY POLICY**

This is a Privacy Policy of CTO of the Year award program. We are committed to protecting your privacy, and with this Privacy Policy we provide you as a data subject information regarding the processing of your personal data in accordance with the EU General Data Protection Regulation (hereinafter "GDPR").

### **1. CONTROLLER**

Spinverse Oy, Tekniikantie 14, 02150 Espoo, Finland

### **2. CONTACT POINT**

Mikko Salminen

[mikko.salminen@spinverse.com](mailto:mikko.salminen@spinverse.com)

+358 50 387 0007

### **3. NAME OF THE DATA FILE**

CTO of the year award

### **4. PURPOSES FOR PROCESSING**

We process your personal data for the purposes of organizing and executing the "CTO of The Year" award program. The award aims to acknowledge the most prominent technology leaders of highly successful European companies.

In addition, when you, as the nominator, contact us, you may give your consent for direct on-line marketing. In that case, we will process your data for marketing purposes in accordance with the privacy policy of the marketing data file titled "Spinverse's customer data management system with customer information".

### **5. LEGAL BASIS FOR PROCESSING**

We process your personal data for previously mentioned purposes based on our legitimate interest.

Such legitimate interest derives from a relevant and appropriate relationship between the data subject (you) and the controller (us), which in turn stems from your participation in our award program through nominating, being nominated or acting as a referee for the nominated person. Personal data is processed for purposes you can reasonably expect at the time and in the context of the collection of personal data.

### **6. CATEGORIES OF PERSONAL DATA**

Personal data that we process for above mentioned purposes is related to three categories of data subjects:

- (a) The nominator, who nominates a candidate (nominee) for the award

— Name, phone number, email

(b) The nominee, nominated for the award

— Name, title, phone number, email

— Duration of the person's position as CTO

— Information of the company the person works for (name, size)

— [Further information on the person, and the company the person works for, as well as information on the societal impact the person has had. The nominator fills this further information in a blank text field in the online nominating system.]

(c) The referee mentioned as a reference for the nominee

— Name, email, phone number

Any consent given by the nominator for direct online marketing purposes and any personal data collected based on the consent is processed according to the privacy policy of our marketing data file titled "Spinverse's customer data management system with customer information".

## **7. REGULAR SOURCES OF INFORMATION**

We collect personal data from you directly, or the person that nominated you for the award or mentioned you as a referee.

## **8. CATEGORIES OF RECIPIENTS**

We process your personal data with the aid of service providers that, as personal data processors, process your personal data on our behalf and for our above mentioned purposes. These data processors provide us ICT services e.g. related to our website. In addition, your personal data is processed by our partners, who in collaboration with us participate in choosing the winner.

For more information on our recipients, please contact our contact point mentioned in section 2.

## **9. TRANSFERS OF DATA OUTSIDE THE EU/ETA**

Personal data is not regularly transferred to third parties outside EU or ETA. When data is transferred outside EU or ETA, adequate and appropriate safeguards for transfer are ensured.

For more information on the matter, please contact our contact point mentioned in section 2.

## **10. TECHNICAL AND ORGANISATIONAL MEASURES FOR PROTECTION**

Material containing personal data is stored on premises to which access is limited to named and authorized personnel only, including our partners.

The servers containing data files are protected by appropriate firewalls and other technical protection measures. Access to data files is restricted by means of personal user identifications and passwords. These access rights are granted only to personnel, including our partners, whose duties involve processing personal data. In addition, all usage of data files and ICT systems is logged.

There are appropriate confidentiality obligations in place by means of which all personal data will be held confidential.

## **11. RETENTION PERIOD**

We store your personal data as long as it is necessary for the organizing and executing the “CTO of The Year” award program, and we will keep your data six (6) months after the winner has been awarded.

Data collected for direct marketing purposes is stored according to the privacy policy of our marketing data file titled “Spinverse’s customer data management system with customer information”.

## **12. YOUR RIGHTS**

You have the following rights regarding the processing of your personal data:

- (a) The right to obtain from us a confirmation as to whether or not your personal data are being processed and if they are processed, access to this data,
- (b) The right to withdraw your consent at any time, without it affecting the lawfulness of processing based on consent before its withdrawal,
- (c) The right to obtain from us without undue delay the rectification of inaccurate personal data, as well as the right to have incomplete personal data completed, including by means of providing a supplementary statement,
- (d) The right to obtain from us the erasure of your personal data without undue delay when the preconditions for such erasure in the applicable legislation are met,
- (e) The right to obtain from us restriction of processing when the preconditions for such restriction in data protection legislation are met,
- (f) The right to receive your personal data, which you have provided us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from us, when the preconditions for such action in data protection legislation are met,
- (g) The right to lodge a complaint with a supervisory authority, if you consider that the processing of your personal data infringes data protection legislation.

You may address all requests related to above mentioned rights to our contact point mentioned in section 2.