

## Privacy Policy

This is the privacy policy of TuyaKnits. Compiled on September 4, 2019. Last updated August 19, 2020.

The information given in this document may be amended from time to time. We, therefore, recommend checking the policy every now and then for updates.

### 1. Registry keeper

TuyaKnits  
Pisanmäki 4 B 14  
02280 Espoo  
Finland  
Business ID: 1883179-3  
www.tuyaknits.com

### 2. Person in charge of registry matters

Tuija Sulisalo  
tuya@tuyaknits.com

### 3. Name of the register

Customer Register of TuyaKnits, Marketing Register of TuyaKnits

### 4. Legal basis for purpose of handling personal data

The lawful purposes for handling personal data according to the general data protection regulation (GDPR) of the European Union (EU) are:

- a consensual basis (messages via email and contact form, newsletter subscriptions)
- a contractual basis (service requests)
- a legitimate interest of the registry keeper (handling customer relationships and customer service)

In our enterprise, personal data will only be processed for predefined purposes, such as:

- communicating with customers
- handling customer relationships
- providing and developing services
- invoicing
- developing novel business activities
- website development
- customer service development
- marketing
- direct marketing
- executing marketing research and analyzing the data statistically

Your personal data will not be used for automated decision-making or profiling.

## 5. Information held in registry

We only record a minimum amount of information about our customers that is necessary for our business activities and handling customer relationships. This data typically includes the following:

- first and last name (emails, contact form, newsletter subscriptions)
- email address (emails, contact form, newsletter subscriptions)
- information on service requests
- invoicing details
- information on website address in some cases
- customer contact details and feedback
- username or the name of your account on social media, like the name of your Instagram account or your username on Ravelry if you are a Ravelry member and purchase a knitting pattern from Tuija Sulisalo's Ravelry store

We only store your personal data in our customer and marketing register for as long as it is relevant and necessary for providing our services and handling customer services. Please, keep in mind that you have the rights ensured by the GDPR of the EU, which are described later.

The requirements for storing data for accounting purposes are regulated by the Finnish Accounting Act and we are obligated to follow that.

## 6. Sources of information

The information contained in the customer register and/or the marketing register is obtained directly from customers by email, using the contact form on our website, by newsletter subscriptions, through social media services, contracts, customer meetings, and other similar occasions where the customers grant the information by themselves.

## 7. Data processors

In our enterprise personal data can be processed by our employee who has a justified reason for processing service requests and for customer service.

In addition to this, your personal information may be handled by contractors whose services are necessary and essential for conducting our business and providing the services we offer. These include, for example, the providers of our email service, contact form, and newsletter:

- The provider of our email service is Zoner Oy, based in Finland, EU. TuyaKnits and Zoner Oy have made a GDPR compliant agreement on processing of personal, routing, and location data.
- The provider of our contact form is Paperform, based in Australia. TuyaKnits and Paperform have made a GDPR compliant data processing amendment (DPA). You can find more information on the GDPR compliance of Paperform by reviewing their Privacy Policy (<https://paperform.co/privacy/>) and Terms of Conduct (<https://paperform.co/terms/>). You can review the content of the DPA here: <https://paperform.co/terms-data-processing-agreement>.
- The provider of our newsletter is MailChimp, based in the USA. TuyaKnits and MailChimp have made a GDPR compliant DPA. You can find the content of the agreement here: <https://mailchimp.com/legal/data-processing-addendum/> The Privacy Policy of MailChimp can be found here: <https://mailchimp.com/legal/privacy/>.

## 8. Disclosing data to third parties

We will only disclose personal data to third parties if it is necessary for operating our website or email services and for delivering our services. You will give your consent for this by, for example, emailing us, submitting a query using the contact form on our website, or placing a service request. The aforementioned third parties may be, for example:

- the provider of our email services (see above)
- the provider of the contact form on our website (see above)
- the provider of our newsletter (see above)
- payment transaction providers
- our bookkeeping service provider
- the provider of an electronic receipt management system

## **9. Disclosing information outside of the EU or EEA**

The personal data may be disclosed for subcontractors or IT service providers operating in third countries, like Google, Amazon Web Service, and Microsoft, who are committed to comply with the GDPR of the EU by signing the EU-US Privacy Shield Agreement or similar.

Data may be disclosed only if it is necessary for operating our website or email services and for delivering our services.

## **10. Principles of registry protection**

All processing of the registry is conducted with care and data within a database are protected appropriately by a username and a password as well as by a regularly updated firewall and virus antivirus software.

The registry keeper ensures that information contained in the register, access rights for the servers and other information critical from the point of data security are handled confidentially and only by employees who have rights to handle such data.

## **11. Your rights as a registered person**

You have the following rights:

- right to check the data saved on you in the register
- right to request to correct or complete the data saved on you in the register
- right to limit processing your data (you may for example stop your data being used for marketing)
- right to oppose processing your personal data
- right to cancel or change your consent (you may for example cancel your marketing consent)
- right to transfer your data
- right to appeal

If you wish to review or correct your personal data contained in the register, please send the request in writing to the registry keeper. The registry keeper may, when necessary, ask you to confirm your identity. The registry keeper will respond your request within a timeline determined by the GDPR (usually within one month).

## **9. Further rights concerning processing of personal information**

As a registered person you have a right to request for deletion of your personal data from our register ("right to be forgotten"). In addition to this, you have other rights determined by the GDPR, such as to limit processing of your personal data in certain cases. All requests are to be sent in writing to the registry keeper. The registry keeper may, when necessary, ask you to confirm your identity. The registry keeper will respond your request within a timeline determined by the GDPR (usually within one month).

Please, notice that the afore mentioned does not apply if processing personal data is necessary on grounds of the EU or Finnish law, obligating the register keeper legally to continue handling personal data.