

## **Privacy Policy / Data Protection Description**

Guzman Monet Group Oy (hereinafter referred to as “GMG”) is committed to protecting the privacy of its service users in accordance with the EU General Data Protection Regulation (2016/679), the Finnish Personal Data Act (523/1999), and other applicable legislation. The registers maintained by GMG Oy are the subscriber register and the customer register. The personal data presented in these register descriptions is processed in order to provide services to our customers.

Prepared on 15.08.2025. Last updated on 15.08.2025.

### **1. Controller**

Guzman Monet Group Oy

### **2. Contact Person Responsible for the Register**

Data Protection Officer: Juan Carlos Guzman Monet

050 5357459

jcgm(a)guzmanmonetgroup.com

### **3. Name of the Register**

GMG Oy maintains a customer register. The purpose of processing personal data is to maintain contact with customers, manage customer relationships, and conduct marketing. The data is not used for automated decision-making or profiling.

### **4. Data Content of the Register**

The register may contain the following information:

- Name of the person
- Position
- Company/organization and its field of activity
- Contact details (phone number, email address)
- Website addresses
- Details of ordered services and their changes
- Billing information
- Other information related to the customer relationship and ordered services.

The IP addresses of website visitors and cookies necessary for the functioning of the service are processed on the basis of legitimate interest, e.g., to ensure data security and collect statistical data on website visitors, in cases where they can be considered personal data. Consent for third-party cookies is requested separately when necessary.

### **5. Regular Sources of Information**

The data stored in the register is obtained from the customer through messages sent via web forms, by email, by phone, through social media services, from contracts, customer

meetings, and other situations where the customer provides their information.

Information about contact persons of companies and other organizations may also be collected from public sources such as websites, directory services, and other companies.

## **6. Regular Disclosures of Data and Transfer Outside the EU/EEA**

GMG Oy may also transfer data to external service providers' servers that enable the technical provision of the service. Data may be transferred outside the European Union and European Economic Area if required for technical implementation or if otherwise permitted under the Personal Data Act Section 23(2-5). Non-EU partners must meet the EU's data protection requirements. Some of the cloud services used may be located outside the EU, for example, services provided by international providers such as Microsoft Office 365.

## **7. Principles of Register Protection**

The register is handled with care, and data processed via information systems is adequately protected. When stored on internet servers, the physical and digital security of the hardware is appropriately ensured. The controller ensures that stored data, server access rights, and other critical information for the security of personal data are processed confidentially and only by employees whose job description includes such tasks.

## **8. Right of Access and Right to Request Correction**

Every individual in the register has the right to check the data stored about them and to request correction of any incorrect or incomplete data. If a person wishes to check their stored data or request correction, the request must be sent in writing to the controller. The controller may, if necessary, request the person to prove their identity. The controller responds within the timeframe set by the EU General Data Protection Regulation (generally within one month).

## **9. Other Rights Related to the Processing of Personal Data**

Individuals in the register have the right to request the deletion of their personal data ("right to be forgotten"). Registered individuals also have other rights under the EU General Data Protection Regulation, such as the restriction of processing in certain situations. Requests must be sent in writing to the controller. The controller may, if necessary, request the person to prove their identity. The controller responds within the timeframe set by the EU General Data Protection Regulation (generally within one month).