

DESCRIPTION OF PERSONAL DATA PROCESSING OF DEBTORS

1. The purpose of the Description of personal data processing of Debtors (hereinafter – the Description) is to set the requirements for processing and protection of Personal data of the Debtors / debtors' representatives processed in the Company.
2. If this Description does not define certain rules, general provisions of the Description of personal data processing of employees, members of the governing bodies, shareholders (representatives), beneficiaries, authorised persons shall apply.
3. Joint controllers (Company) of the Personal data processed for the purposes below are: Silvestica 2 Green Forest Finland Oy, Company code 3215578-7, business seat address: c/o Navigator Partner Oy, Skillnadsgatan 11 A 20, 00130 Helsingfors, Finland, phone No. +46(0)705-132430, e-mail address: ekonomi@crkforest.se and Silvestica 2 Green Forest AB, Company code 559315-9444, business seat: Västra storgatan 22, 281 31 Kristianstad, Sweden, phone No. +46(0)705-132430, e-mail address: ekonomi@crkforest.se.
4. The personal data is processed according to the below-stated conditions:

Purpose	Basis	Data categories	Storage term	Needs to be provided
Debt administration	Legitimate interest of the Company (to express claims)	Contact/identification data, position, debt / services / goods sold / payments data	Until full debt recovery. Personal data contained in the documents is stored for the terms established in the Local Laws	We process data already at our possession

5. If Data subject fails to provide his/her personal data which we have the obligation to process by the legal acts or which is necessary or such data is necessary in order to secure the legitimate interest of the Company – the Company will use other sources to get this data and this might add up to the amount of the debt.
6. The personal data can be disclosed to the following data recipients: Courts, Lawyers, CRK Forest Management AB, Owners and administrators of Information Systems (Navcite Consulting AB), debt recovery service providers.
7. The Company shall protect personal data by ensuring its confidentiality, integrity and limited availability. Confidentiality means that personal data is not disclosed to persons who do not have access to these data. The Company ensures the confidentiality of personal data. Integrity means that personal data should be accurate and relevant for the purpose for which it is being processed. Limited availability means that only authorized persons (consumers) have access to and manage personal data for legitimate and defined purposes.
8. The Company shall take the necessary technical and organizational measures to protect personal data against unauthorized processing and / or loss. The Company installs the appropriate hardware and software, applies the necessary security measures (including physical and electronic access control).
9. Personal Data subject has the following rights:
 - 9.1. To know (be informed) about his/her Personal data processing.
 - 9.2. To familiarise with his/her Personal data processed.
 - 9.3. To request for correction of his/her Personal data.
 - 9.4. To request for erasure of his/her Personal data ('the right to be forgotten').
 - 9.5. To request for restriction of his/her Personal data processing.
 - 9.6. To data portability.
 - 9.7. To disagree with his/her Personal data processing.
10. Requests related to Data subject's personal data shall be submitted to the Company by registered letter to: c/o Navigator Partner Oy, Skillnadsgatan 11 A 20, 00130 Helsingfors, Finland or e-mail address: ekonomi@crkforest.se.

11. The requests must include: information enabling the Data subject to be identified; requested actions; personal data for which such actions are requested. Only reasonable requests are responded. The Company examines the application within 30 (thirty) calendar days of its receiving, without any additional requests for time received, and informs the Data subject of the action taken on the request. The Data subject shall be informed in the form in which the request was made.
12. The Data subject may complain to the supervisory authority of the actions (omissions) of the Company in relation to the exercise of the Data subject's rights:

Office of the Data Protection Ombudsman

Visiting address: Ratapihantie 9, 6th floor, 00520 Helsinki

Postal address: P.O. Box 800, 00521 Helsinki, Finland

E-mail: tietosuoja@om.fi

Telephone: +358 (0)2956 66700

13. When processing personal data, the Company does not apply automatic decision-making.
14. Personal data is not transferred to a third country or to an international organization.
15. This Description may be reviewed once per calendar year on the initiative of the Data controller and / or in the exchange of legislation governing the processing of personal data.
16. Amendments to the Description shall take effect from the date of their approval.
17. This Description is valid until is changed or cancelled by the Company.