Drillcom privacy policy

Who we are and what we do

Drillcom Oy is a company located in Tampere, Finland. Org.nr is FI08330143.

> Drillcom Oy
>
> Sileesuonkatu 6
>
> 33330 TAMPERE
>
> FINLAND
>
> Puh. +358 44 3425 340
>
> e-mail: janne.virtanen@drillcom.fi
>
> Our url is https://drillcom.fi

We develop and manufacture hydraulic rock drills and related equipment. We also provide maintenance and technical support. We sell spare parts related to equipment we have manufactured.

What are our intentions

Today's software products are often made open for everyone: open to code and open to use. Each product is a small part of a huge, complex and constantly changing dynamic entity that exchanges and collects data mostly for surveillance and commercial or political purposes. Our privacy policy is therefore a sum of software providers' privacy policies, which are listed below for you to judge whether these principles that these software providers follow, are adequate to protect your privacy.

No one can guarantee 100% security in the internet. Our motivation is constant learning and producing products that fulfill our customers' needs - not collecting personal data from you! We provide web services to communicate and communication mostly includes personal information of each participant. We try to minimize the amount of personal data that is in our possession. Web visitor tracking data is needed to secure the site from those users that have bad intentions and for following market demands and trends.

IF YOU DO NOT AGREE WITH ALL THESE PRIVACY POLICIES, YOU SHOULD NOT ACCESS OR USE THESE SERVICES.

Third party privacy policies

Google

At the moment Google is maybe the best known and probably the most efficient data collector. Also in this privacy policy it is in an essential role. We have listed here the key software products that we are using in order to communicate with you. We use embedded (Google's) Youtube videos and Google maps at our web site. So, Google's privacy policy is the one that describes best the protection level of your personal information, because it has with high probability the largest chunk of your data.

Google's privacy policy and terms of use: https://policies.google.com/privacy?hl=en

AWStats (awstats.org)

Uses:

Plugin for country detection from IP location (use geoip country database or client domain name),
Plugin for city detection from IP location (use geoip city database),
Plugins for US/Canadian Region , ISP and/or Organizations reports (require non free third product geoipregion, geoipisp and/or geoiporg database), WhoIS links.

GeoIP country, GeoIp city, GeoIpRegion, GeoIpIsp and GeoIp2 City are MaxMind's databases.

About WhoIs-databases:

https://motherboard.vice.com/en_us/article/vbpgga/whois-gdpr-europe-icann-registrar

All features:

http://www.awstats.org/

https://wordpress.org/about/license/

Email programs and applications:

Mail (in Iphone), factory-based installation

https://www.apple.com/legal/privacy/en-ww/

Mail (in Adroid), factory-based installation

https://policies.google.com/?hl=en&gl=us

Outlook

https://privacy.microsoft.com/en-us/privacystatement

Roundcube

https://wordpress.org/about/license/

Social media:

Facebook and Messenger

Our Facebook url is: https://www.facebook.com/Drillcom-Oy-626697630760802/

Facebook's and Messenger's privacy policy is available here:
https://www.facebook.com/about/privacy/update

These Terms govern your use of Facebook and the products, features, apps, services, technologies and software that Facebook offers: https://www.facebook.com/legal/terms/update

Youtube channel

Our youtube channel's url is: https://www.youtube.com/user/Drillcom

Youtube privacy policy is available here: https://www.youtube.com/t/privacy_guidelines

Google, owner of Youtube, shows privacy policy and terms of service here: https://policies.google.com/?hl=en

What personal data we collect

You can contact us by visiting us, by calling, by mailing, by texting, by messaging, by using our web services: web site, Facebook or by Youtube channel. You can meet us at exhibitions or other trade or technology shows. In most of these cases you will leave a trace. It might be your business card or phone number, maybe an IP-address or a url for the company you are representing. We receive information also from public registers of enterprises and branches.

The data that we receive can be divided in two main categories:

1. The data you give us. It can be your name and contact details. It can also be a comment, an order, an enquiry or a friend request or a comment in Facebook or any other information that you share with us.
2. The trace you leave. You may visit our web services and our security and statistics plugins make a note of it. This data is collected to maintain safety as well for visitors as for site owners. It is also used to follow market trends.

Interactions through various media are needed in order to be able to create and deliver products that are useful and usable. Also it is possible to increase productivity through creating a safe and inspiring communication opportunities; sharing views and encouraging each other makes us stronger and more capable achieving our goals.

The only sensitive personal data that we have, relates to normal human relations management: sick leaves, salaries etc.

Comments

Comments contain your remarks possibly with your application specific avatar, which you have created by yourself. Platform that enables communication collects your IP address and additional information like browser type and version in order to recognize and block spam.

Facebook: Visitors are allowed to comment. Comments are open for public.

Messenger: If you are our Facebook friend, you are able to contact us by Messenger. These comments are not made public.

Web site: Web site platform supports commenting, but we don't provide visitors a chance to comment.

Youtube: Visitors are allowed to comment. Comments are open for public.

If you want to remove a comment you have made, contact our data controller: Janne Virtanen,

Puh. +358 44 3425 340 , s-posti janne.virtanen@drillcom.fi

Email

Email contains your email address and possibly your message and/or attachment. There may be more personal information in your message or attachment, if you choose to give us additional information. The application that provides mailing, collects your IP address and additional information like browser type and version in order to transfer the message and block spam.

We are using the following programs and applications to read and respond to your emails:

Outlook, Mail and Roundcube. Emails, that contain personal information, can be divided in fifteen categories:

1. Orders

   These are saved in order to serve our customer better and to track selling.

2. Feedback

   These may be saved to be used in product design, development, manufacturing and customer. service.

3. Agreement related matters

   These are saved in order to handle matters that fall under agreement.

4. Job applications and CVs

   These are transfered to employee register, if the person in question is selected for a vacant employment. If not, these are kept in mail for max three years, if they address the key selection

criteria, for further jobs.

5. Offers with contact information

    These are kept in mail, if they are considered to fill the present or the future needs.

6. Medical certificates and absence related information

    Certificates and estimations of absence times are shared only with employees, who need this information. Emails will be deleted, when the matter has been closed.

7. Logistic related matters with contact information

    Contact information is saved because of book keeping (invoices) and handling logistics.

8. Accounting related matters

    There are legal bases to keep relevant mails.

9. Announcements

    These are saved, if they are relevant.

10. Internal and external, incoming and outgoing technical support

    These are kept in mail and saved to be utilized in internal and/or external use, to track customers' and employees' technical support needs and to create and track support process.

11. Ads

    These are kept in mail and saved, if they are relevant.

12. Partnerships related information and discussion

    These are kept in mail and/or saved in order to deepen or enhance knowhow and/or business.

13. Person related product development issues

    These are kept in mail and/or saved in order to deepen or enhance knowhow.

14. Education and training, registering and course material with contact information

    These are saved for future use.

15. Others

    Irrelevant emails are deleted, relevant mails are kept as long as they are needed in order to maintain and enhance knowhow, customer service, logistics, bookkeeping and/or daily operation.

If you want to remove your mail, contact our data controller: Janne Virtanen, Puh. +358 44 3425 340 , s-posti janne.virtanen@drillcom.fi

Media

We don't provide visitors a chance to upload documents, pictures or videos for security reasons. If you want to share with us something, you can send us those in email and we don't publish any of those without your consent. We don't use recognizable faces in our web services without consent unless it is a link to a (magazine-type) publication or your own blog, which is encouraging and empowering. If you nevertheless find a picture among our publications, which you feel violates your privacy, let us know that and we remove that picture/document/video immediately.

Contact our data controller: Janne Virtanen, Puh. +358 44 3425 340 , s-posti janne.virtanen@drillcom.fi

Contact forms

Contact form collects your name, email address and message and mails them to people, who handle these

matters in our company. We'll delete the collected data yearly. If this contact leads to a longer customer relationship, we'll transfer the personal data to our customer register.

If you are from Denmark, Sweden or Norway, and you'll contact our Finnish main office, we may forward you to our nearest reseller, but we'll notice you when doing that.

Application collects personal information only from those who have installed the application (meaning us).

If you want to change or remove your contact information, pls contact: Janne Virtanen,

Puh. +358 44 3425 340 , s-posti janne.virtanen@drillcom.fi

Cookies and other similar techniques

Cookies are tiny pieces of information stored on your computer to track activity of the browser you are using. Cookies and other similar techiques are used to implement such functionalities as counting number of web visitors and web visits or tracking which links are clicked. You can deny and/or remove the cookies by browser settings. In some browsers there is a possibility to choose "Following denied". Instructions for each browser are easily available in the internet.

There are also other techniques to follow web visits. We list here the programs and applications that observe web traffic at our web site and you can verify by reading their privacy policies whether they can offer you adequate privacy while you visit our site.

We use cookies. If you enter our web site, you'll get cookies from stonepower.fi and youtube.com. After that the number of cookies depend on what you choose. For example if you use the link leading to our Facebook site, you'll receive Facebook cookie.

For further details please consult the help menu in your browser or visit www.allaboutcookies.org .

AWStats

See "Third party privacy policies": AWStats for details.

Wordpress:

Wordpress collects personal information only from the installer (us), not from you.

Check Wordpress cookie policy:

https://en.support.wordpress.com/cookies/

https://codex.wordpress.org/WordPress_Cookies

WP Statistics

"Web browser cookies" in Privacy policy: https://wp-statistics.com/privacy-and-policy/

WP Statistics uses GeoLite2 data created by MaxMind.

MaxMind

"Cookies, Web Beacons, and Embedded Scripts" in Privacy policy:
https://www.maxmind.com/en/privacy_policy

"Blocking or Deleting Cookies" in Privacy policy: https://www.maxmind.com/en/privacy_policy

Wordfence

"1. Information collection" in Privacy policy: https://www.wordfence.com/privacy-policy/

WP Meta SEO

See "Third party privacy policies": WP Meta SEO for details.

Facebook and Messenger:

Facebook cookies policy: https://www.facebook.com/policies/cookies/

Youtube:

How Google uses cookies, cookie types and managing them:
https://policies.google.com/technologies/cookies

Instructions for clearing cache and cookies: https://support.google.com/youtube/answer/32050?co=GENIE.Platform%3DDesktop&hl=en

Embedded content from other websites

Our web site includes embedded content (google videos and maps). Embedded content from other websites behaves in the exact same way as if the visitor had visited the other website.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content.

We have embedded material from the following sources: youtube.com, maps.google.com

Analytics

We use statistics to follow web visits: how many visitors, how many times they visit, how long they stay, what products or issues are favoured. Statistics also reveal the amount and frequency of attacks as well as disfunctioning of pages. It is important to know which browsers are the most commonly used, because then we know which browsers must be tested most carefully.

Wordpress:

Basic installation shows the following statistics of web visitors: https://en.support.wordpress.com/stats/

WP Statistics

This product includes GeoLite2 data created by MaxMind, https://www.maxmind.com

Here you can find what kind of information WP statistics plugin is collecting: https://wp-statistics.com/2017/05/26/features/

Wordfence

Wordfence features: https://www.wordfence.com/help/firewall/statistics/

Facebook and Messenger

What kind of information Facebook collects: https://www.facebook.com/about/privacy/update

What we can see is basic visitor statistics with details like visitor names (given by themselves when they made an account in Facebook), comments, time stamps, shares, likes, clicks etc. See description of Facebook insights:

https://www.facebook.com/help/search/?q=insights

https://www.facebook.com/business/a/page/page-insights

Youtube:

Here is a list and description of YouTube Analytics features:
https://support.google.com/youtube/answer/1714323?hl=en

What can you do to minimize your use history: https://policies.google.com/technologies/product-privacy?hl=en

Why we collect personal information

We collect personal information to create and maintain customer relationships, to handle logictics and HR (human resource) issues and to fill our legal oblications. We follow statistically visitors' activities in order to protect our site and in order to learn which products and features our customers are looking for.

Where we send your data

We shall not share your personal data with anyone, if it is not a legal oblication. Only if we are not your nearest seller, we'll forward your message to your nearest reseller/importer. If we do that, we'll keep you informed about it.

But some of the applications that we have used to implement our web services do collect data and they may share data also with external participants. See "Privacy policies of third party". Read also carefully privacy policies of social media application providers.

Facebook and Messenger:

Facebook shares following information: https://www.facebook.com/about/privacy/update

Youtube:

Youtube is governed by Google, so google policy applies Youtube watchers. See google's privacy policy.

How long we retain your data

We retain your data one year after contact form has been delivered to us unless your contact grows into longer communication or a business relationship.

Customer information is not removed, if it is still essential for our task to provide information on your Drillcom equipment. It is possible for any device manufacturer, that there will be found a bug or defect in a product that has been delivered to customers. In that case all product owners must be informed. This is a compelling reason to retain customer information. It is a security issue for both of us.

Information related to employees is held according to the law.

What rights you have over your data

Right of subject access means that you can make a request under the Data Protection Act to any organisation processing your personal data. You can also request that that organisation erases any personal data they hold about you. This does not include any data they are obliged to keep for administrative, legal, or security purposes. You can do that by sending a written request to the data controller including your full name, address and contact telephone number; any information used by the organisation to identify you (account numbers, unique ID's etc), details of the specific

information you require and any relevant dates, for example emails in a specified time frame.

Janne Virtanen, Puh. +358 44 3425 340 , s-posti janne.virtanen@drillcom.fi

How we protect your data

Only authorized people can access your information.

Code security

Open code

AWStats, Wordpress, Wordpress plugins and Thunderbird are open source code. This means that code is open for anyone to check it and that the most of those people who code, don't get direct financial benefit of their work. It is harder to hide secret functions into code like surveillance, hacking, attack or other criminal functionalities, when the code is open for all at alltimes.

The GNU general public license: http://www.gnu.org/licenses/gpl-3.0.txt

https://wordpress.org/about/license/

Hosting

The servers that we use, except social media servers, are looked after by: oscar.fi and louhi.fi. Social media servers are located and secured according to third party company's choices.

The customer register server is located in Finland in premises that fulfill the requirements set by Finnish Communications Regulatory Authority according to 48A/2003 concerning "Important premises". It defines the demand for physical protection of communication network against fire, water and burglary. The network is also protected by a firewall. Web and email server is also located in Finland. The server is protected by a firewall and the server lies in Level 2 segmented network. Only the authorized people can access these servers.

Most of the devices and the installed applications are manufactured and controlled outside the Europeen Union.

Wordpress:

https://en.support.wordpress.com/security/

Wordfence

We use WP Wordfence plugin to secure our site.

We have an obligation to protect the data we possess. Wordfence provides us partly the same data as statistics, but it also protects our site by closing out attackers and by warning us of new hazards.

Device security

Communication devices, that are used to contact the supplier, read or process the personal data, have a password or a PIN enquiry or another means of restricting unauthorized users to access the data. They are connected only to known networks, that have a firewall enabled. The communication devices have a security software installed.

We use the following security programs to scan the devices: Windows defender, https://www.f-secure.com/en/f-secure and https://us.norton.com/

Print security

We avoid printing your personal information out. If we have to do that, we keep it in a locker and distroy it when it is not needed anymore. The law may require retaining of data due to bookkeeping obligations.

What you can do to increase your security

Remember to keep careful track of your accounts at social media service providers. Basic advice is available here: https://en.support.wordpress.com/security/

What data breach procedures we have in place

Servers

Servers where our databases are located are under constant physical and sw-based surveillance. If there is data breach, we will be informed. If we have a data breach we inform those whose information has leaked.

We analyze the cause for a breach and take necessary actions to prevent similar type of causes in the future.

External memories

External memories are stored with printed documents in a locker.

What third parties we receive data from

We receive information from you only if you contact us directly. We get only non-personally identifiable information out of our statistics and security applications. See details in:

"Third party privacy policies"

"Analytics"

"Wordfence"

We receive information also from public registers like enterprise and branch registers.

What automated decision making and/or profiling we do with user data

We don't profile or use automated decision making based on your user data.

Who should I contact to receive information you have about me

You can obtain from the data controller confirmation as to whether or not personal data concerning you is being processed, where and for what purpose.

Data controller: Janne Virtanen, Puh. +358 44 3425 340 , s-posti janne.virtanen@drillcom.fi

You can download the available data in each application in the following ways:

Facebook and Messenger:

To find the data and to download it:

https://www.facebook.com/help/1701730696756992

https://www.facebook.com/help/212802592074644

Who can I ask to remove my information

Data controller will remove your personal information from our register if you ask it and there are no legal bases to keep it.

Contact our data controller: Janne Virtanen, Puh. +358 44 3425 340 , s-posti janne.virtanen@drillcom.fi

After that there's still information on you in the internet, especially if you have used social media:

https://www.theguardian.com/technology/askjack/2014/aug/14/can-i-get-sites-like-facebook-and-google-to-remove-all-my-personal-data

Additional information

See declarations for each register in our database.
Forms originate from: http://www.tietosuoja.fi/fi/index/materiaalia/lomakkeet/rekisteri-jatietosuojaselosteet.html

1 Customer register

DESCRIPTION OF THE FILE
Personal Data Act (523/1999) section 10

Date of drafting: 18.11.2021

1. Controller	**Name** Drillcom Oy FI08330143
	Contact information 33330 TAMPERE FINLAND janne.virtanen@drillcom.fi Tel +358 44 3425 340
2. The person in charge and/or contact person	**Name** Janne Virtanen
	Contact information See Controller contact information
3. Name of the register	Customer register for sales and service
4. The purpose for processing the personal data / the purpose for the use of a register	The purpose for processing the personal data / the purpose for the use of a register is to develop and maintain potential and present customer relationships. This is based on the following prerequisites in the personal data act 523/1999 8§.

OFFICE OF THE DATA PROTECTION OMBUDSMAN   MODEL FORM   25 November 2004
Tel: +358 10 36 66700
Tel: +358 10 36 16670 (information service 9 a.m. to 3 p.m.)   Fax: +358 10 36 66735
www.tietosuoja.fi

[Unofficial translation]

5. Content of the register	This customer register may include one of the following data or all of them: the name of a person with contact details, duties and roles, service and product orders related to her/him, delivery and invoicing information
6. Regular sources of information	Customer's contact, order, offer enquiry, contact details related to technical support, public registers of enterprises and branches, exhibitions, tech shows or other business related happenings and contact details gathered in company operations
7. Regular destinations of disclosed data and whether the data is transferred to countries outside the European Union or the European Economic Area	We don't deliver customer register data to other organizations or individuals.Only if we are not your nearest seller, we'll forward your message to your nearest reseller/importer. If we do that, we'll keep you informed about it. Data from customer register may be trasferred outside the European Union or the Europen Economic Area. Personal Data Act 523/1999 5§ sets guidelines for data transfer.
8. The principles how the data file/register is secured.	A. Manual register Manual register is held in a locked storage cabinet. Only the authorized people in the company can access the cabinet. B. Data register External memories (USB) are kept with manual register in a locked storage cabinet. Email and other programs, applications and devices used in communicating are locked by password, PIN code or other technique. Firewalls and internet security programs are installed and in use.

- Section 10 of the Personal Data Act does not require to make a note of this information, but it's recommendable to do so, regarding the right of access of the data subjects. Furthermore, it also describes the content of the register.

Tel: +358 10 36 16670 (information service 9 a.m. to 3 p.m.)   Fax: +358 10 36 66735
www.tietosuoja.fi

[Unofficial translation]

9. The right of subject access	This right of subject access means that you can make a request under the Data Protection Act to any organisation processing your personal data. Concerning this customer register you can do that by sending a written request to register's contact person (see 2. in this file) including your full name, address and contact telephone number; any information used by the organisation to identify you (account numbers, unique ID's etc), details of the specific information you require and any relevant dates, for example emails in a specified time frame.
10. The right to demand correction of failures in your personal data	You have the right to demand the correction of incorrect or inaccurate data related to you in this register. Concerning this customer register you can do that by sending a written correction request to register's contact person (see 2. in this file) including your full name, address and contact telephone number; any information used by the organisation to identify you (account numbers, unique ID's etc), details of the specific information you require to be changed, a correction and any relevant dates.
11. The right to deny the use of your personal data to any purpose that is not mandatory due to Finnish legislation.	You can deny partly or entirely the use of your personal data for example for marketing. Pls contact the data controller in writing.