

Nikula Legal Ltd

Privacy Policy

1. General information

This privacy statement describes how Nikula Legal Ltd (Business ID 0914055-2), a law firm registered in Finland, hereinafter referred to together as “Nikula Legal”, process the personal data of its clients; what data is collected and for which purposes, to which parties the data can be disclosed, and how data subjects can influence the processing.

Nikula Legal protects the privacy of data subjects and complies with the General Data Protection Regulation (EU) 2016/679 (GDPR), as well as other applicable data protection legislation and the best practices for data processing in all its processing of personal data.

This privacy statement applies to the processing of personal data collected through the www.nikulalegal.fi and www.nikula.pro websites, other Nikula Legal online services, marketing, contacts, and events.

“Personal data” means any information relating to a natural person (data subject) who can be identified, directly or indirectly, as defined in the GDPR. Data from which a data subject cannot be identified, directly or indirectly, is not considered personal data.

The websites of Nikula Legal may include links to third-party web pages/websites and services operated by other organizations - this privacy statement is not applicable to their use. Therefore, you are encouraged to consult their privacy policies. Nikula Legal cannot be responsible for the privacy policies and practices of other sites (even if you access them using links from our website).

2. Data controller and data protection officer

Data controller:	Nikula Legal Ltd (Business ID 0914055-2; VAT reg. no. FI0910552)
Lawyer in charge:	Anne Nikula
Address:	Hevossalmentie 18 D, 00870 Helsinki
Phone:	+358 50 341 6562
Email:	anne@nikulalegal.fi

3. Purposes and legal basis for processing personal data

Nikula Legal only collect personal data that is relevant and necessary for the intended purpose. Personal data may be collected for the following purposes: newsletter subscriptions, event registrations, opinion polls, tracking and optimization of website use, and to respond to contact requests. In addition, we process personal data to manage the events organized by Nikula Legal alone or in collaboration with other possible partners.

The purpose of the processing may also be to design and develop business operations or perform marketing, maintenance and development of services, quality assurance, direct marketing, and opinion and market research for the group’s other companies.

The above-mentioned personal data processing is based on the legitimate interest of Nikula Legal in informing of and developing its business activities, and thereby providing better service to the users of its services.

By processing personal data, we also strive to improve and ensure the security of our services, risk management and prevention and detection of malpractices. These are based on our statutory obligation.

Furthermore, digital direct marketing directed on the basis of personal private personal data (and not for instance to a person's business e-mail) is based on consent.

For event and opinion poll purposes, we may inquire about your preferences or wishes, but we do not require this information to be provided. In that case, the processing of the data provided by you is based on your consent.

4. Categories of personal data, information content and sources of personal data

Nikula Legal collects only such personal data that is relevant and necessary for the purposes described in this privacy statement.

The following data concerning the data subjects will be processed:

Category of personal data	Examples of information content
Identification and contact information	Individuals: name, personal ID/social security number, phone number, e-mail address; Company: name, business ID, registration information, representative name, title, representative's persona ID
Electronic identification information (possibly)	Electronic communication identification information, our website search and browsing information, browser and operating system information, network behaviour, log information (e.g. time and date), and statistics and other user analyses generated on the basis of such data Please see the Cookies section below
Consents and prohibitions given by the data subject	Data relating to the data subject's consent to digital direct marketing (e.g. newsletter) or to other consent to the processing of personal data, as well as to the withdrawal of the above-mentioned consents and the prohibitions of the data subject.
Marketing events and opinion polls	Wishes and preferences, participation information
Other voluntary data provided by the data subject	Information that the data subject has provided, for instance, in connection with contact requests, feedback or other communications

As a general rule, personal data is collected from data subjects themselves in connection with marketing or contact requests or through the website.

Personal data may also be collected from the community on behalf of which the data subject is acting or through the community website.

5. Retention of personal data

Nikula Legal only retains personal data for as long as necessary to fulfil the purposes defined in the privacy statement, unless there is a requirement to store it longer under the legislation (for instance due to responsibilities and obligations concerning specific legislation, accounting obligations or reporting obligations) or in case Nikula Legal needs the data for the establishment, exercise or defense of legal claims or to handle a similar disagreement.

The retention period and retention criteria vary depending on the categories of personal data and on the purpose of each special category of personal data.

Consents and prohibitions shall be retained for their period of validity.

Personal data relating mainly to marketing and opinion polls shall be retained for a maximum of twelve (12) months from the marketing purpose for which it was collected. The data can be used later for other marketing purposes.

With regard to companies, the retention of data subjects' personal data is linked to the time that the data subject is acting as a representative of Nikula Legal Client Company. Nikula Legal asks the data subject to notify the Nikula lawyer of any changes in his role.

When personal data is no longer needed for the purposes specified above, the data will be erased within a reasonable period of time, unless the legislation binding, obliges Nikula Legal to retain the data for a longer period of time.

6. Recipients of personal data

Nikula Legal is located in Finland and personal data is mainly kept in Finland.

In accordance with this privacy statement, Nikula Legal may outsource the processing of personal data to service providers or subcontractors, such as IT suppliers and accountancy offices. Nikula Legal provides adequate contractual obligations to ensure that personal data is processed in a proper and lawful manner.

The following parties are involved in the processing of personal data:

- Microsoft Oy (as well as other companies belonging to the group)
- Google Inc.

Nikula Legal may disclose contact information to our collaboration partners within the limits of the applicable legislation and the rules of proper professional conduct for advocates. As a general rule, no data is regularly disclosed to third parties.

In special cases, personal data may be disclosed to authorities when obliged or authorized by legislation.

In addition, in emergency situations or other unforeseen circumstances, Nikula Legal may be required to disclose data subjects' personal data in order to protect the lives and health of persons as well as property. Furthermore, in case Nikula Legal is involved in legal proceedings or other dispute resolution procedures, it may have to disclose personal data concerning data subjects.

In case of a merger, acquisition or other business arrangement in which Nikula Legal is involved, it may have to disclose data subjects' personal data to third parties. In such cases, the privacy of the data subject will be safeguarded. Furthermore where necessary, the data subject will be duly notified of these arrangements.

7. Transfer of personal data outside the European Union

Personal data obtained by Nikula Legal is mainly processed in Finland and within the European Union. If personal data is transferred outside the European Union (for instance when it is necessary for the management of customer relationships), Nikula Legal will ensure the adequate level of protection for personal data, for instance, by agreeing on matters related to the confidentiality of personal data and its processing required by data protection legislation, for example, by using the standard contractual clauses by the European Commission.

8. Data protection principles and security of processing

Nikula Legal processes personal data in a manner that ensures the appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage.

Nikula Legal uses appropriate technical and organizational measures in order to keep the data secured, including the use of firewalls, encryption techniques, secure IT equipment facilities and appropriate management of access control, guidance for the personnel participating in the processing of personal data and guidance for subcontractors.

Contracts and other documents to be stored in original form are kept in a locked space with limited access granted only to those parties which are entitled to access the data.

Based on the Finnish Employment Contracts Act (55/2001) and contractual terms of confidentiality, all parties processing personal data are bound by professional secrecy regarding personal data processing matters. Furthermore, legal professional privilege covers confidential communications with Lexia's clients.

In accordance with this privacy statement, the company may outsource the processing of personal data to service providers or subcontractors, in which case the company will ensure, with adequate contractual obligations, that personal data is processed properly and lawfully.

Data obtained via website traffic trackers is protected by a TLS-encrypted connection. Data possibly obtained through Google Analytics service is stored and processed by the service providers on their own servers. Signing into Google Analytics linked to the Nikula Legal websites requires logins only granted to the Nikula lawyer.

Any manual material in the possession of Nikula Legal will be kept in a locked office space that is only accessible to individuals who are entitled to access them. Paper material will be destroyed in a secure manner.

9. Rights of data subjects

Data subjects have rights under data protection legislation.

Right of access to personal data and right of inspection

The data subject shall have the right:

- to obtain confirmation as to whether or not personal data concerning him or her is being processed;
- to inspect and view data concerning him or her and, upon request,
- to obtain the data in a written or electronic form.

Right to rectification and right to erasure

The data subject shall have the right:

- to request the rectification of incorrect or inaccurate data concerning him or her;
- to request the erasure of his or her data.

The data controller shall on its own initiative delete, correct, and complement any personal data which is discovered to be incorrect, unnecessary, incomplete, or outdated for the intended purposes.

Right to data portability, right to restriction of processing and right to object to processing

The data subject shall have the right:

- to request the transfer of his or her data to another controller;
- under conditions defined by data protection legislation, to request the restriction of processing of his or her personal data;
- to object to the use of his or her data for a certain type of processing;
- to prohibit the disclosure and processing of his or her data for direct marketing purposes.

In such cases where personal data suspected to be incorrect cannot be corrected or removed, or if the removal request is unclear, Nikula Legal will limit the access to such data and mark such data uncertain.

Right to withdraw consent

Where personal data processing is based on separate consent given by the data subject, the data subject shall have the right to withdraw his or her consent to processing of his or her personal data. The withdrawal shall not affect the lawfulness of processing based on consent performed before the withdrawal.

Exercising rights

All requests to exercise any of these rights should be made in writing and submitted to Nikula Legal. Nikula Legal shall ensure the identification of the requester. The request will be responded to within a reasonable time and, where possible, within one month of the request and the verification of identity. In order to be able to fulfil the above-mentioned requests, Nikula Legal may request additional information. If the data subject's request cannot be met, the refusal shall be communicated to the data subject in writing.

10. Right to lodge a complaint with a supervisory authority

The data subject shall have the right to lodge a complaint with a data protection authority if the data subject considers that the processing of personal data relating to him or her infringes current legislation.

Data Protection Ombudsman

Address: P.O.Box 800, 00531 Helsinki, Finland

Phone: +358 29 566 6700

Email: tietosuoja@om.fi

11. Cookies and other similar tracking technologies

Nikula Legal may use cookies to monitor the traffic on the www.nikulalegal.fi and www.nikula.pro websites. In order to achieve cookies, Google Analytics (Google Inc.) is used. When you visit our sites, your browser automatically sends certain information to Google. This includes, for example, the web address of the page that you are visiting or the keyword used in the Google search engine with the help of which the user has been redirected to the Nikula Legal websites.

Google Analytics generates anonymous reports from data obtained through cookies, such as the number of visitors, the website from which the visitor arrives to the Nikula Legal websites, the duration of the website visit, whether or not the user has visited the website before, and which pages of the website the visitor visits.

The website traffic monitoring may be used to develop the Nikula Legal websites for better user experience. You can prevent Google Analytics from gathering information about you, and in such a case, please, do consult the Google website.

Nikula Legal may also use other third-party services and cookies on our websites to enable the content of the Nikula Legal websites to be shared on social media. These service providers include Facebook, Twitter and LinkedIn – there is a logo of the social media used on our websites.

You are able to disable, manage, and delete cookies through your browser or mobile device settings.

12. Amendments to the privacy statement

Amendments and changes to this privacy statement can be made because of the development of and changes in Nikula Legal business activities due to changes in data protection legislation. The newest version of our privacy policy can be obtained from the website of www.nikula.pro (English) or www.nikulalegal.fi (Finnish).