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## 1. DATA CONTROLLER

Millog Oy, Business ID 2051859-5, Hatanpään valtatie 30, 33100 Tampere, Finland  
Email: tietosuoja(at)millog.fi  
Phone: +358 20 469 7000

## 2. NAME OF THE REGISTER

Millog Oy's auction register

## 3. PURPOSE AND LEGAL BASIS FOR PROCESSING PERSONAL DATA

Personal data is processed of persons participating in auctions organised by the data controller that intend to participate in bidding on the goods for sale. To participate in bidding, a person must fill out an auction registration form in which personal data is collected.

If a person does not provide the personal data requested on the auction registration form to the data controller for processing, the person cannot submit bids for the goods for sale, i.e. participate in the bidding.

The legal basis for processing personal data is:

- Legitimate interest of the data controller or a third party, when processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party (such as the Finnish Defence Forces (seller of goods), i.e. the efficient organisation of the auction, which benefits both the controller, the Finnish Defence Forces and the persons participating in the auction.
- Performance of a contract, when the person fills in the auction registration form and provides personal data in order to participate in the auction. A contract between the controller and a person is formed when a person submits a bid and participates in an auction, and the goods are sold to the person who made the winning bid.

## 4. DATA CONTENT OF THE REGISTER

The register contains information on the following persons:

- Persons registered for the submission of bids for the auction

The following data is processed about the data subject that is necessary for each of the above-mentioned purposes, such as:

- Person's first and last name
- Number given to the bidder
- Name of the organisation the person may represent
- Street name and number/PO Box
- Postal code, city and country
- Phone number
- Nationality

- Email (optional)
- Date the person visited the auction

After filling in the registration form, the designated employees of the data controller enter the data into an Excel file.

## 5. RETENTION PERIOD OF PERSONAL DATA

The data controller processes and stores personal data only for as long as required by a legal obligation or when is necessary for a predefined purpose of processing the personal data. Personal data that has become unnecessary and which the data controller no longer has grounds to store or process will be deleted at regular intervals in accordance with the data controller's own data protection policies.

Personal data is primarily stored until more than four (4) years have passed since the person's last visit to the data controller's auction, at which time the data will be deleted. As the same person may participate in several auctions organised by the data controller, the retention period of the data is justified, as the personal data already provided by the person does not need to be re-recorded in connection with the new participation. Individuals also have the right to request earlier erasure of their personal data from the data controller.

However, personal data may be stored for longer periods than stated here for the establishment, exercise or defence of legal claims.

## 6. REGULAR SOURCES OF PERSONAL DATA

Personal data is obtained from the person himself or herself through the auction registration form.

## 7. REGULAR DISCLOSURE OF DATA AND TRANSFERS OF DATA OUTSIDE THE EUROPEAN UNION OR THE EUROPEAN ECONOMIC AREA

By default, personal data will not be disclosed outside the data controller's organisation. If necessary, personal data of a person who has submitted a bid in the auction may be disclosed to the Finnish Defence Forces.

Personal data will not be transferred outside the European Union or the European Economic Area.

## 8. PROFILING

The data controller does not use solely automated decision-making, such as automated profiling, as part of processing personal data.

## 9. RIGHTS OF THE DATA SUBJECT

### 9.1. Right of access by the data subject to his or her data

The data subject has the right to obtain confirmation from the data controller as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and a copy of the personal data processed.

### 9.2. Right to rectification and erasure

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Within the limits of the legislation, the data subject has the right to obtain the rectification or erasure of inaccurate, unnecessary, defective or outdated personal data concerning him or her.

### **9.3. Right to lodge a complaint with a supervisory authority**

The data subject has the right to lodge a complaint with a supervisory authority, if the data controller is infringing applicable legislation concerning personal data processing and data protection. The supervisory authority in Finland is the Data Protection Ombudsman, [www.tietosuoja.fi](http://www.tietosuoja.fi).

### **9.4. Right to object**

The data subject has the right to object, on grounds relating to his or her particular situation, at any time processing of personal data concerning him or her and having its legal ground on the legitimate interest of the data controller, including profiling.

The data controller will no longer process personal data unless the data controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

### **9.5. Right to data portability**

The data subject has the right to receive data concerning him or her, which he or she has provided to the data controller, in a structured, commonly used and machine-readable format and has the right to transmit those data to another data controller, in cases where processing is based on consent or contract and the processing is carried out by automated means.

When exercising the above described right to data portability, the data subject has the right to have personal data transmitted directly from one data controller to another, where technically feasible.

### **9.6. Responsibilities of the data controller**

The data controller will inform the data subject about all measures that have been taken on basis of a request, without undue delay and in any case within one month having received such a request. The time limit may be prolonged for at most two months where needed, taking into consideration quantity and complexity of the requests made. The data controller will inform the data subject about such possible prolongment within one month having received the request, as well as about the reasons for delay. If the data subject has presented his or her request electronically, the information must be provided electronically when possible, unless the data subject requests otherwise.

If the data controller does not carry out the measures based on the data subject's request, the data controller must immediately and at the latest within one month since having received the request, notify the data subject about the reasons for this, as well as about the possibility to lodge a complaint with a supervisory authority and to use other legal remedies.

### **9.7. Exercising rights**

You may exercise your above stated rights by contacting the data controller via sending an e-mail to the e-mail address [tietosuoja\(at\)millog.fi](mailto:tietosuoja(at)millog.fi). We aspire to provide a reply as soon as possible and, where needed, provide you with additional instructions or ask additional questions based on your request.

Please note that prior to fulfilling a request we have a right as well as an obligation to verify your identity, due to which we must be able to recognize you in an adequate manner.

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If your request is manifestly unfounded or excessive, we may charge a reasonable fee for administrative costs to carry out your request or refuse to act on the request.

## 10. CONTACTS

In all questions and situations considering the personal data processing and use of data subject's rights, the data subject can contact the data controller by sending an email to tietosuoja(at)millog.fi.

The data controller has right to request the data subject to specify his or her information request in writing and the identity of the data subject may be verified before taking any other measures.

## 11. CHANGES TO THIS PRIVACY NOTICE

The data controller may change this Privacy Notice.