

# Privacy Policy and Data File Description

## Registry holder

**Esa Investment Oy** (Business ID: 2981961-8)

Apajakuja 2 A, 02230 Espoo, Finland

Phone: +358 40 586 0928

Email: [esa.kinnunen@esainvestment.com](mailto:esa.kinnunen@esainvestment.com)

## Contact Person for the Register

Esa Kinnunen

[esa.kinnunen@esainvestment.com](mailto:esa.kinnunen@esainvestment.com)

+358 40 586 0928

## Website Associated with the Register

[www.esakinnunen.com](http://www.esakinnunen.com)

## Purpose of Processing Personal Data

Collected personal data is used for managing and developing customer relationships, delivering orders and newsletters, and for digital marketing through tools such as Meta, Google, and email marketing platforms.

## Legal Basis for Data Collection and Processing

Data is collected and processed based on the customer's consent or for the performance of a contract with the customer.

## Contents of the Register

The register consists of two parts: Customer Register includes the customer's name, email address, phone number, postal address, and contract and order details. It also includes information on individuals who have been in discussions about a potential customer relationship, submitted a contact request, or received a written offer. Newsletter Subscriber Register includes the subscriber's name and email address.

## Regular Sources of Data

Customer data is collected when a contract is made, a contact request is submitted, or a written offer is requested. Newsletter data is collected when a user subscribes to a newsletter, free guide, or training material. Data is also collected using Google Analytics tools.

## Data Retention Period

Customer Register data is retained as long as it is needed to maintain the customer relationship or for service development. Newsletter Register data is retained as long as the newsletter subscription is active. Once the subscription is cancelled, the data is deleted.

## Disclosure and Transfer of Data Outside the EU/EEA

Data is not regularly disclosed to third parties. However, some third-party service providers, such as international cloud services, used by the company may store data outside the EU or EEA.

## Use of Cookies

This site uses cookies. A cookie is a small text file stored on the user's computer that allows the website to recognize returning visitors and generate analytics. Cookies do not damage your computer or files. Cookies are used to improve the website and business operations, and to target advertising. Users must accept cookies to use the site. If the user does not consent to data collection, they should refrain from using the website. Most browsers allow cookies to be disabled in the settings. However, disabling cookies may affect proper website functionality. By accepting cookies, you ensure smooth and proper use of the site.

## Data Security

All personal data in the register is confidential and not shared with third parties. Digital data is protected with usernames and passwords. Only employees of the controller who require the data for their duties have access.

## Right to Access Personal Data

Everyone has the right to access their personal data stored in the register. The request must be sent from the email address listed in the register to the contact person.

## Right to Rectify and Erase Data

Everyone has the right to request correction of incorrect personal data. The request must be sent from the registered email address to the contact person. Data can also be deleted upon request or by using the "Unsubscribe" function included in each communication.

## Other Rights Related to Personal Data Processing

Personal data will only be used for the purposes mentioned above.

**Privacy policy last updated: 21 December 2025**