

### **PRIVACY POLICY**

**Effective from: 2025-09-03** 

Applies to:

- Visitors of marinator.fi (and subdomains)
- All site forms (contact/booking, partner/supplier, careers)
- Emails to @marinator.fi and file uploads (e.g., CVs)
- B2B communications with clients, partners, and suppliers

**Does not apply to:** third-party sites/services, partners acting as independent controllers, client data where we act as a processor, or employee data (covered separately).

**Issued by:** Marinator

# 1) Who we are

Marinator Oy ("we", "us").

Address: [street, city, country] • Business ID: [XXXXX] Email: privacy@marinator.fi (or irina@marinator.fi) We have not appointed a Data Protection Officer.

### 2) What we collect

- **Contact / Appointment forms:** name, email, phone, company, role, meeting format/time, message, and any files you attach.
- Partner / Supplier forms: company details, position, portfolio/presentation files, messages.
- Careers: CV, cover letter, links (e.g., LinkedIn/portfolio), contact details.
- Website data: technical logs, IP address, device/browser info, pages viewed, cookies (see §7).

Please don't send special categories of data (health, religion, etc.).



# 3) Why we process your data (legal bases)

- To respond and deliver services (perform a contract or steps before it).
- **Recruitment** (legitimate interest; with your consent to keep a talent pool).
- Supplier/partner onboarding and cooperation (legitimate interest/contract).
- Security, spam prevention, and site analytics (legitimate interest).
- Marketing communications (consent; you can withdraw any time).

# 4) How long we keep it

- General inquiries / appointments: up to 24 months after last contact.
- **Recruitment:** deleted within **12 months** after the process ends, unless you consent to a longer retention for our talent pool. If hired, data moves to HR records per employment law.
- Contracts / invoices: per legal retention requirements (typically 6–10 years).
- Server logs: up to 12 months unless needed longer for security.

#### 5) Sharing & processors

We use trusted service providers who process data on our behalf, such as:

- Hosting & backups (e.g., Hostinger or equivalent)
- **Email/SMTP & productivity tools** (e.g., Microsoft/Google)
- Form and file storage within WordPress/Bricks (if "save submissions" is enabled)
- Analytics and security (e.g., firewall, anti-spam)
  They only access data as needed to provide their services and must protect it.

#### 6) Transfers outside the EEA

If a provider is outside the EEA, we rely on **adequacy decisions** or **Standard Contractual Clauses** and apply supplementary safeguards where appropriate.

### 7) Cookies & analytics



We use necessary cookies for site operation and may use analytics cookies to understand usage and improve the site. Non-essential cookies load **only with your consent**. You can change or withdraw consent at any time via the cookie banner/browser settings.

## 8) Your rights

You can:

- · Access, correct, or delete your data
- Restrict or object to processing
- Withdraw consent (for example, marketing/talent pool)
- Data portability (where applicable)

To exercise rights, email **privacy@marinator.fi**. We will respond within **30 days**.

## 9) Security

We apply technical and organizational measures (access controls, encryption in transit, least-privilege access, backups). No method is 100% secure, but we work to protect your data.

### 10) Children

Our site and services are not directed to children under **16**. We do not knowingly collect children's data.

### 11) Changes

We may update this Policy. The latest version and date appear at the top of this page.

## 12) Complaints

You can contact us first. You also have the right to complain to the **Office of the Data Protection Ombudsman (Finland)** if you believe your data protection rights have been violated.

Contact: legal@marinator.fi

If you want us to delete or update your submission (including CV), please mention the email you used and the page/form where you submitted it.