

March 2024

PORTAL PRIVACY NOTICE

This notice describes how personal data is processed in Customer portal, which is used to login to portal and to share data and documents between the Accountor service and the Customer.

1 PROCESSOR OF PERSONAL DATA

- Accountor Holding Oy and
- the subsidiary of Accountor, with whom you deal in given situation, for example the Accountor company with which you or the company you represent have a contractual relationship.

When the expressions "Accountor" or "we" are used in this Notice, it means the Accountor company responsible for processing your personal data.

2 PURPOSE AND LEGAL BASIS FOR PROCESSING PERSONAL DATA

Personal data is processed only in accordance with the Agreement, data protection legislation and written instructions given by the Customer. The purpose of the processing is to provide a secure login service to the portal, transmission of messages, as well as to get the material produced in the service into the customer's possession and the customer's material to Accountor to produce the service.

3 DATA SUBJECT CATEGORIES

Data subject categories processed in the Portal include:

- Data of the customer's contact person
- Data about the customer's employees or partners
- Data of Accountor's support and admin users

4 PERSONAL DATA CATEGORIES

- Personal data that is included in the documentation to be transferred: depending on the service, this may be the customer's:
 - information related to the payment of employees' salaries and bonuses, such as the data subject's basic information, salary information, bonus information, social security number, bank account number, vacation related information, etc.
 - Information related to the HR service, such as information related to the employment relationship, evaluation information, training information, etc.
 - other personal data related to the provision of accounting services.
- Information related to the use of the Portal, such as
 - Username, name, login information, usage information

5 REGULAR DATA TRANSFERS AND TRANSFERS OF DATA OUTSIDE THE EU OR THE EUROPEAN ECONOMIC AREA

In connection with the service, data is not transferred to third parties, nor is data stored outside the EU or the European Economic Area.

6 TECHNICAL AND ORGANISATIONAL SECURITY MEASURES

The system generates log data from its usage, which is collected and managed centrally by Accountor. This allows monitoring of service usage and enables the investigation of potential misuse cases.

By default, the system is used through a web browser over the HTTPS protocol, ensuring traffic encryption with TLS 1.2 encryption. Depending on the client's browser, encryption may also be TLS 1.3.

When files are uploaded to the Document Service, the traffic also utilizes the HTTPS/TLS combination. Data is encrypted with AES-256 encryption at rest, and all traffic is encrypted. All files uploaded to the service are scanned for malware.

Access to the application is restricted by user permissions. The client's user permissions for the service are defined and granted by the client's main user. It is the client's responsibility to keep user permissions up to date. The service follows best practices for password management, and all users have access to multi-factor authentication. In Accountor's service, only portal administrators have access to the portal. Accountor employees' access to the documents differently, on a strict need to know basis.

7 RETENTION TIME

Documents in document storage are stored for a maximum of 6 months, after which they are deleted. Before deletion, the system sends notification to users informing when the material is about to be deleted. If necessary, the user needs to copy the documents to the customer's own archive system before the deletion.

When the customer relationship ends, the customer must retrieve all necessary files from the portal within the agreed notice period. After this, Accountor deletes the documents and the customer's access rights.

8 SUB-PROCESSORS OF THE PORTAL

- Microsoft Corporation: information is stored in Azure environment of Accountor. Data is encrypted. Microsoft is certified under US Data Protection Framework.
- Futurice Oy; application development and support.
- Okta Inc. (Auth0); access management platform. Data is encrypted in transit and rest.
- Enfo Oy; IT services and -support.
- Friends Technology Oy; integration platform as a service.

9 COOKIE NOTICE

Use of cookies

We use cookies and other similar technologies (“cookies”) on our Website. Cookies are small text files placed on your device to collect and remember useful information, deliver relevant content, ensure the functionality of our Website and provide us information about the use thereof.

We use following categories of cookies, which are described generally herein, on our Website:

Strictly necessary cookies

These cookies are required for the Website to work and they cannot be disabled. They are usually only used when you access a site or use features that generate service requests, such as log in or use forms. You can set your browser to block these cookies or show an alert. However, some parts of the Website may not work if you do this.

Cookie name	Purpose	Cookie type	Storage time
__Host-next-auth.csrf-token	Authentication & session management	First party cookie	Session
__Secure-next-auth.session-token	Authentication & session management	First party cookie	12 h
__Secure-next-auth.callback-url	Authentication & session management	First party cookie	Session
lang	Browsing session management	First party cookie	1 H

10 CONTACT DETAILS

Accountor Group contact details:

Accountor Holding Oy, 2480336-9, Keilaniementie 1, 02150 Espoo.

If you have further questions regarding this Notice or the personal data processing in Portal, you can contact privacy@accountor.com.