

EXTERNAL PRIVACY NOTICE

Introduction

AS Barrus values all its employees, clients, suppliers and partners and makes every effort to ensure that their personal data is processed legally and securely, including preventing unauthorized access and transmission. We have drawn up current Privacy Notice to give You the overview of how we collect, use, store and share Your personal data.

Who we are?

The Controller of personal data is AS Barrus (hereinafter Barrus). We are woodworking company, whose main activity is the production of high-quality finger jointed and laminated redwood. Our offices are located in Verijärve and in Tartu.

You can contact us at the following phone number +372 78 50 700 or by sending an email to info@barrus.ee. Our address for correspondence is Verijärve, Võru Parish, County Võru 65541.

What is personal data?

Personal data is any information relating to an identified or identifiable natural person. For example your name, identification number, e-mail address, phone number, IP-address etc.

How do we obtain your personal data?

1. When you provide your business contacts to us yourself by sending us a letter by post or sending an email to our general or employee's email addresses.
2. When you are listed as a contact person in a business relationship between your employer and Barrus.
3. When you visit us and our surveillance camera records your movements.
4. We may also occasionally obtain personal data about you from publicly-available sources, such as contacts from your company's website, information catalogues or promotional materials.
5. Sometimes we get your personal data during everyday activities from our business partners and clients.

Personal data categories we process about you

Barrus does business with other companies. For that reason, we process personal data that is mainly business contact information. Such as your name, business email address, business phone number, business address, the company you work for and your position.

If you are applying for a job and send us your CV and other possible personal data, then we process personal information about your qualifications, employment history, place of residence etc.

Your image if your movement has been recorded by our surveillance camera.

However, as you have the possibility to provide us with personal data that is not listed above, we may also unknowingly process categories of personal data not listed above.

Special categories of personal data

Special categories of personal data include personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for uniquely identifying you, data concerning health or data concerning your sex life or sexual orientation.

We do not obtain or process special categories of personal data (sensitive data) about you. If you have provided us with personal data what can be categorised as sensitive data, then we will take actions to delete this data or obtain explicit consent from you for our continued processing of it.

We do not knowingly attempt to solicit or receive information from children and we will take actions to delete personal data about children or will obtain the parental consent required for processing it when we learn that we process such data.

Purpose and legitimate basis of processing your personal data

We process your personal data only for the original purpose it was obtained.

1. We assume that if you provided us your business contact information, the company you are representing already has business relations with us or there is a clear intention to enter into business with Barrus.
2. If you have some other important matter, due to which you have contacted us and have requested a response, then our purpose of processing your personal data is to satisfy your request, and processing personal data for that purpose is in our legitimate interest.
3. The purpose of recording video images is to ensure surveillance and security in our territory and also to monitor the technological processes. Processing is based on our legitimate interest.
4. We process your data if it is necessary to comply with statutory requirements and the processing purpose is to comply with different legal obligations we have.

How we process and retain your personal data?

1. We select and forward information you have provided to us to relevant persons at Barrus, depending on the content of your request.
2. Your personal data will be processed in Estonia and also in Ireland and the Netherlands, where our IT service providers have data Centres.
3. We will delete immediately any correspondence that can be classified as spam or phishing letters and irrelevant sales or marketing proposals.
4. If we are already in business with you or if we can conclude from the information you have provided that there is an intention of entering into business with Barrus, then we will add your contact information to our vendors database or CRM system and retain it until it is needed for carrying out the contract. We will review those business contacts annually and delete business contacts no longer needed for the purpose.

5. Correspondence, which is provided by you regarding any other matter but woodworking, we will review annually and delete the correspondence, if the matter can be considered complete.
6. Due to security considerations it is not possible to disclose the retention period of records of security cameras but we review those later only in case of accidents at works, theft or in order to monitor the technological processes.
7. We will retain personal data that we must process for complying with statutory requirements for as long as is required by legal acts.

How we protect your personal data?

We have employed a wide range of security measures which are both technological and organisational to help protect your personal data against undue access, modification and deletion. For example, only authorised employees have permission to manage personal data. We use firewalls and other IT tools for preventing unauthorised persons from gaining access to our network. The majority of the documents containing personal data is stored in Microsoft Sharepoint application enabling the use of tools provided by Microsoft against undue access or modification of data. In light of the above, you can rest assured that your personal data is in safe hands but please note that securing of data security is a continuous process which we address consistently.

Sharing your personal data

We do not sell, trade or otherwise transfer your personal data to third parties. Exceptions are:

1. Third parties who are processors and to whom we outsource services to support our main business, such as IT services.
2. It is necessary to comply with statutory requirements.

Your rights

The General Data Protection Regulation (“GDPR”)

http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2016.119.01.0001.01.ENG

provides the following rights for you as an individual regarding your personal data:

- The right to be informed and the right to access your personal data;
- The right to rectification and erasure;
- The right to restrict processing;
- The right to data portability;
- The right to object processing;
- The right to give and draw back consent;
- Rights in relation to automated decision making and profiling.

However, GDPR also stipulates many restrictions to those rights listed above.

If at any point you need more information about your personal data that we process and how we process it or if you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, then please contact us using following contact details:

E-mail: info@barrus.ee

Tel: +372 78 50 700

Address for correspondence: Verijärve, Võru Parish, County Võru 65541.

You have also the right to contact The Data Protection Inspectorate, whos contacts can be found on their web page:

<http://www.aki.ee/et/inspektsioon/kontaktid-nouandetelefon>

Updating this Privacy Notice

We are aware that information privacy is an ongoing responsibility, so we will update this Privacy Notice occasionally, as needed.

The current version of Privacy Notice was accepted on September 21st, 2018 by Barrus management.