

ASIO and GDPR

This document describes the principles of processing data covered by the GDPR legislation in the information systems developed and maintained by Asio-Data Oy Ltd., and the division of responsibilities and tasks between the Asio Customer and Asio Company.



1. Consideration of GDPR regulations in Asio operations and booking software solutions

The EU's GDPR data protection regulation entered into force on May 25, 2018.

The privacy protection obligations set forth by GDPR legislation are mandatory for companies across industries to implement and maintain in all their operations and software solutions.

The data protection legislation applies to the processing of all personal data.

From the IT software supplier point of view GDPR means new policies, processes and measures related to the processing of personal data, and changes in the software functionality and use of the software related to the processing of personal data.

The GDPR regulations and the interpretations related to the regulation are constantly updated, requiring the software supplier to provide software updates to maintain the software and all related processes and operations GDPR-compliant.

2. Collecting and storing personal data in the Asio hosted databases

In order provide the booking service for end-users, and in order to provide the booking administration service for booking service administrators, Asio collects and stores personal data into it's database.

<p>What personal data is collected and stored</p>	<p><u>The types of personal data processed on behalf of the controller:</u></p> <p><i>Personal data is stored in the Asio Booking solution registers. Stored data is custom to Asio customer, depending on Asio customer need to collect and store personal data of their own customers and users.</i></p> <p><i>Stored data typically contains: user name, home address, billing address, contact information such as email and phone number.</i></p> <p><u>Groups of registered users:</u></p> <p><i>External user groups include individuals and persons connected to associations, companies or other commercial entities.</i></p> <p><i>Internal users are Asio Customer's own employees who use Asio solution for administrative purposes.</i></p>
<p>Where the data is stored</p>	<p>Data is stored into the database and registers of Asio Booking solution.</p> <p>Asio customer's data is never transferred outside EU.</p> <p>Asio Booking solution cloud servers are hosted by Digital Ocean. Digital Ocean's secure cloud servers reside inside EU.</p>

3. Legitimate interest

As a data controller, Asio customers have the legitimate right and interest to process and store personal data of their customers and users of booking services.

Collecting and storing personal data is required in order to provide the booking service and support, to operate the invoicing and to fulfil the legal obligations related to the booking operation.

4. Personal data processed by Asio

The processing of Asio's own personal and customer data is described in the register statement available at the company home page.

Under the GDPR legislation, Asio has the role of Personal Data Processor.

However, Asio's personnel does not process personal data in the Customer's databases without written request from the Asio customer, for instance in order to provide support or maintenance related service.

Asio's test and development servers do not contain Asio Customer's personal data.

5. Personal data controlled by Asio

Asio acts as a data controller only with regard to its own personal and customer data.

Asio doesn't act as a data controller on behalf of the Asio customer.

6. Asio customer as a Personal Data Controller

Asio customer own's and is responsible for it's own customer and booking user related personal data.

Under the GDPR legislation, Asio customer has the role of Personal Data Controller.

6.1. Personnel and stakeholder information

Only absolutely necessary personal data of Asio customer's own personnel and stakeholders should be stored in the Asio database and registers.

6.2. Booker information

Only absolutely necessary personal data of Asio customer's own customers and booking service users should be collected and stored in the Asio database and registers.

In order to provide the booking service, Asio customer has the need to collect some personal information of the booking service user, such as contact and billing information.

When stored information are no longer needed to provide the service or to fulfill any legal obligations, it is Asio customer's responsibility to delete any such personal data in a timely manner.

6.3. Contract customer information

Contract customer information such as invoicing information and related contact details are stored in the database. Asio Customer has a legitimate interest to do so.

7. Personal data retention periods

The need for data storage periods is customer-specific.

Asio's administrative GDPR tools enable pseudonymization and deletion periods of data to be defined per data set. It is Asio customer's responsibility to clear any such personal data from the database, when the need to store the data becomes obsolete.

For those that use Asio cloud service and Asio servers, the log data is deleted automatically three years after the data was logged in to the system. Those who use their own server need to take care of clearing the logs according to their own operating principles.

8. Obligations of Asio

Asio's duty is to maintain the supplied booking solution operative and secure.

Asio's duty is to maintain the booking solution and its functions GDPR-compliant containing required functions for data security and data protection.

Asio's duty is to ensure that the booking solution contains necessary logging functions for information requests made by booking users.

Asio's duty is to train the Asio customer to use the administrative GDPR tools of Asio solution.

9. Obligations of Asio customer

Asio customer's responsibility is to regularly use the GDPR functions of Asio, such as data deletion and/or pseudonymization.

Asio customer needs to have a person in their organization, who is trained to use the Asio administrative GDPR tools.

Asio customer is responsible for deleting any user accounts and personal data from Asio registers, when such information is no longer needed to provide the service or to fulfill any legal obligations.

10. External systems

Should Asio customer have a need to transfer personal data from Asio database to external systems, any such activity should be separately agreed with Asio before taking action.

Asio is not responsible for any data processing activities resulting data transfer originating from Asio customer's action or request.

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