

FNDRY. Privacy Notice

Compliant with GDPR (EU 2016/679) and the Finnish Data Protection Act (1050/2018)

Last updated: 20.2.2026

1. Data Controller

FNDRY. Advisory Oy

Business ID: 3578048-1

Address: Vellamonkatu 6 A 7, 00550, Helsinki, Finland

Email: hello@fndryadvisory.fi

FNDRY determines the purposes and means of processing personal data in connection with its advisory and assessment services.

For assessment deliveries performed on behalf of client organisations, FNDRY may act as a **data processor**, while the client organisation remains the **data controller**.

2. Purpose of Processing

FNDRY processes personal data to:

- manage client relationships and deliver advisory services,
- administer leadership and personality assessments through approved vendor platforms,
- prepare reports, summaries and recommendations for clients,
- handle invoicing and financial administration,
- respond to enquiries submitted through the website contact form,
- ensure secure and professional business operations.

FNDRY does **not** sell or make available personal data to third parties for marketing or unrelated purposes.

3. Personal Data We Process

A. Contact and Professional Data

- Name, job title and employer
- Email address and phone number
- Project-related communication
- Engagement documentation (proposals, contracts, meeting notes)

B. Assessment and Diagnostic Data

Assessment data is collected through vendor platforms (Talogy, Clevry). It may include:

- answers to questionnaires,
- behavioural and preference indicators,
- cognitive or skills assessment results (if used),
- system-generated reports,
- FNDRY's professional interpretations.

FNDRY does **not** store raw questionnaire data. All assessment data is hosted on the vendor's platform, except for reports explicitly exported for interpretation and delivery.

C. Website Form Data

Name, email address, and message content. Users are advised not to include sensitive personal data (such as health information, identification numbers, or details about third parties) in contact form messages. If sensitive data is submitted, FNDRY will handle it in accordance with this notice but will not use it beyond responding to the enquiry.

D. Billing Data

- Contact details of client representatives
- Invoicing records and payment information (Holvi)

4. Legal Basis for Processing

Processing is based on:

- **Contract performance** (delivery of advisory and assessment services),
- **Legitimate interest** (maintaining client relationships, communication, service improvement),
- **Legal obligation** (financial records and accounting).

For assessment participants, the legal basis for processing depends on the nature of the engagement. Where assessment is conducted as part of a contractual selection or development process, the basis is typically contract performance or legitimate interest of the employing organisation. The employing organisation, as data controller, is responsible for ensuring a valid legal basis applies to its participants and for providing appropriate information to them prior to assessment. Participants receive an information notice before completing any assessment.

Where consent is the appropriate legal basis under applicable law or context, FNDRY will seek it explicitly and separately.

5. Data Sharing and Subprocessors

Personal data may be processed by trusted service providers acting solely on FNDRY's instructions.

Current subprocessors

- Microsoft (OneDrive, Teams, Outlook)
- Zoner (website hosting, email, and contact form routing)
- Talogy (assessment delivery)
- Holvi (invoicing and payments)

All subprocessors implement appropriate technical and organisational measures under GDPR Article 28.

6. Data Transfers Outside the EU/EEA

Some subprocessors may use affiliates or data centres outside the EU/EEA. FNDRY has verified that current agreements with all relevant subprocessors include Standard

Contractual Clauses (SCCs) issued by the European Commission, supplemented by appropriate security measures where required. No data is transferred outside the EU/EEA without adequate safeguards in place.

FNDRY reviews subprocessor compliance as part of its annual data protection review.

7. Data Retention

Personal data is retained according to the following principles:

- **Assessment reports and related interpretation materials:** 18 months from engagement completion. Where a client organisation requires a different retention period, this must be agreed in writing within the applicable Data Processing Agreement. Where assessment content appears within broader project documentation, the assessment data will be deleted within the 18-month period even if the surrounding documentation is retained longer.
- **Project documentation and work products:** 3 years after engagement completion.
- **Emails:** 2 years as a default. Emails that form part of a completed project engagement are retained for 3 years, in line with the project documentation period.
- **Client contact details:** up to 5 years for relationship management.
- **Financial records:** 6 years (Accounting Act).

After the applicable retention period expires, data is securely deleted or anonymised.

8. Your Rights

Under GDPR, you have the right to:

- access your data,
- correct inaccurate data,
- request deletion (subject to contractual and legal limitations),
- restrict processing,
- object to processing based on legitimate interest,
- request data portability,
- lodge a complaint with the Finnish Data Protection Ombudsman.

To exercise your rights, contact: hello@fndryadvisory.fi

9. Security

FNDRY applies appropriate technical and organisational measures to protect personal data. Exported assessment reports are stored in access-controlled cloud storage (Microsoft OneDrive) with access limited to FNDRY personnel directly involved in the relevant engagement. Raw assessment data is not downloaded or stored locally. When an engagement concludes, exported reports are retained for the applicable period defined in Section 7 and then securely deleted. FNDRY does not share assessment outputs with third parties outside the engagement without explicit instruction from the client organisation.

10. Updates to This Notice

This Privacy Notice may be updated from time to time due to regulatory or operational changes. The latest version is always available on our website.