

Privacy Policy

Egraine Oy — egraine.fi · Last updated: 25 July 2026 · Version: 2.1

1. Who we are (data controller)

Egraine Oy (“Egraine”, “we”, “us”, “our”) is the controller responsible for the personal data collected through this website.

- **Egraine Oy**, Business ID 3365921-5 · VAT FI33659215
- Aleksanterinkatu 52, Stockmann 7th floor, 00100 Helsinki, Finland
- Email: info@egraine.fi · Phone: +358 44951 3430

For any question or request about your personal data, contact us at info@egraine.fi (Attn: Privacy — David Mikulovský).

2. What this policy covers

This policy explains how we handle personal data when you visit **egraine.fi**, contact us, apply for a job, or express interest in a partnership, ambassador, content or affiliate collaboration. It does not cover the separate websites and services of Medex Beauty Clinic (medex.fi) or THANN (thann.fi), each of which has its own privacy information, nor third-party websites we link to.

3. The personal data we collect, why, and on what legal basis

We only collect what we need. The table below lists every processing activity on this site.

#	What we collect	Where it comes from	Why we use it (purpose)	Legal basis (GDPR Art. 6)
1	Contact / inquiry data — name, company/business, email, phone (optional), inquiry type, and the content of your message	You, by emailing us (this site’s contact options are email links; the site itself has no form back-end)	To respond to and manage partnership, distribution, collaboration and general inquiries; to take steps at your request before entering into a possible business relationship	Art. 6(1)(b) (<i>steps prior to a contract</i>) where you are asking to do business with us, and/or Art. 6(1)(f) <i>legitimate interest</i> in responding to and managing business correspondence
2	Job-application data — name, contact details, CV/résumé, cover note and anything you choose to include in your application email	You, by emailing info@egraine.fi	To assess your application and manage recruitment	Art. 6(1)(b)/pre-contractual and Art. 6(1)(f) <i>legitimate interest</i> in recruiting; Art. 6(1)(a) <i>consent</i> if we ask to keep your application on file for future roles
3	Technical / server log data — IP address, timestamps, requested URLs, browser/device type, error data	Collected automatically by our hosting infrastructure	To operate, secure and troubleshoot the site and prevent abuse	Art. 6(1)(f) <i>legitimate interest</i> in the security and availability of our website

We do not use website analytics or advertising/tracking tools (no Google Analytics or similar) on this site, and we do not build visitor profiles. If that ever changes, this policy and the Cookie Policy will be updated and analytics cookies will be set only with your prior consent.

We do not knowingly collect special categories of personal data (Art. 9 GDPR — e.g. health data) through this website. Please do not include health or other sensitive information in a message or job application.

4. Cookies

This website currently sets **no cookies** and uses no analytics, advertising or tracking technologies. If we ever introduce cookies, any non-essential ones will be set **only after you give consent** via a cookie banner, and you will be able to change or withdraw that choice at any time. Full details are in our [Cookie Policy](#).

5. Who we share your data with (recipients / processors)

We do not sell personal data and we do not share it for others’ marketing. We use a small number of trusted service providers (“processors”) who act only on our instructions under a data-processing agreement (Art. 28 GDPR):

Recipient	Role	What they process
Websupport (team.blue)	egraine.fi domain registration, DNS management, and email hosting (not web-content hosting)	Inbound emails, incl. contact and application emails (#1, #2); DNS records
Hostinger	Hosts the virtual server (running Coolify) that serves the egraine.fi web pages	Server / access-log data, incl. visitor IP (#3)

The website’s fonts and all other page assets are served from our own hosting — no third-party service is called when you load our pages.

We may also disclose personal data where required by law, to establish or defend legal claims, or to a successor in the event of a business reorganisation.

6. International data transfers

Our aim is to keep all processing within the EU/EEA: Websupport operates from the EU (Slovakia), and our web hosting is provided by Hostinger under its EU entity. Where any provider processes personal data outside the EU/EEA, we rely on an appropriate safeguard under Chapter V GDPR — the **EU-US Data Privacy Framework** (for certified providers) and/or the European Commission’s **Standard Contractual Clauses (2021)**. If we later change email or hosting providers, any transfer implications will be reflected here before the change takes effect. You can request a copy of the relevant safeguard by emailing info@egraine.fi.

7. How long we keep your data

We keep personal data only as long as necessary, then delete or anonymise it. Our periods:

Data	Retention
Contact / inquiry data that does not lead to a business relationship	24 months from last contact, then deleted
Contact / inquiry data that becomes an ongoing partner relationship	Duration of the relationship + the statutory limitation/accounting period
Job applications — unsuccessful candidates	12 months after the process closes, unless you consent to us keeping it longer
Server / email logs	6 months

8. Your rights

Under the GDPR you have the right to **access, rectify, erase, restrict** or **object to** processing (including objecting to processing based on legitimate interest), **data portability**, and to **withdraw consent** at any time for any consent-based processing.

To exercise any right, email **info@egraine.fi**. We respond **within one month** (extendable by two further months for complex requests, in which case we tell you). We may need to verify your identity. Exercising your rights is free unless a request is manifestly unfounded or excessive.

If you believe we have handled your data unlawfully, you can lodge a complaint with the Finnish supervisory authority:

Office of the Data Protection Ombudsman (Tietosuoja-valtuutetun toimisto) Postal: PO Box 800, 00531 Helsinki · Visiting: Lintulahdenkuja 4, 00530 Helsinki tietosuoja.fi · tietosuoja@om.fi · +358 29 566 6700

9. Is providing data mandatory?

Providing contact or application data is voluntary, but without it we cannot respond to your inquiry or consider your application.

10. Automated decision-making

We do not use automated decision-making or profiling that produces legal or similarly significant effects (Art. 22 GDPR).

11. Minors

This website is aimed at businesses and professionals and is not directed at minors. We do not knowingly collect personal data from anyone under the age of 13 (the age of consent for information-society services under the Finnish Data Protection Act, 1050/2018). If you believe a minor has provided us data, contact info@egraine.fi and we will delete it.

12. Security

We apply appropriate technical and organisational measures to protect personal data (access controls, encryption in transit, and vetting of processors). No transmission method is completely secure, but we work to protect your data and to notify you and the authorities of any breach where required (within 72 hours of becoming aware, under Art. 33–34 GDPR).

13. Changes to this policy

We may update this policy from time to time. The current version, with its “last updated” date, will always be available on this website. Material changes will be highlighted.

14. Contact

Questions or requests about this policy or your data: **info@egraine.fi** (Attn: Privacy — David Mikulovský).