

DATA PROTECTION DESCRIPTION OF HELTTI'S CUSTOMER AND MARKETING REGISTER

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1 CONTROLLER

Heltti Group: Heltti Oy (2544593-8) or Shortum Oy (2802468-8) ("**Heltti**")

Mannerheimintie 12 A, FI-00100 Helsinki

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2 CONTACT PERSON FOR REGISTER QUERIES

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3 NAME OF THE REGISTER

Heltti's Customer and Marketing Register

4 BASIS AND PURPOSE OF PROCESSING THE PERSONAL DATA

The grounds for processing personal data is the customer relationship between Heltti and Heltti's customer or other cooperation partner, Heltti's justified interest (marketing purposes) or the data subject's consent. Personal data may also be processed based on Heltti's mandatory obligation (on the grounds of, for example, Act on the contractor's obligations and liability when work is contracted out 1233/2006, or Act on the fulfillment of certain obligations of Finland as a member of the United Nations and of the European Union 659/1967).

Data on Heltti's existing and potential customers' and cooperation partners' responsible and contact persons as well as possible owners will be stored to Heltti's Customer and Marketing Register.

Personal data in Heltti's Customer and Marketing Register may be processed for the following purposes:

- Managing customer relationships and customer service, maintaining details of customers' or other cooperation partners' contact persons.
- Analyzing, grouping and reporting of customer relationships and other purposes relating to the development of customer relationships and Heltti's business.
- Organizing events for stakeholders.
- Collecting and processing of customer feedback.
- Implementation and analyzing of marketing research and opinion as well as customer surveys.
- Managing, developing, targeting and monitoring marketing, communications and sales activities of Heltti and its cooperation partners.
- Recording customer service center calls in order to authenticate service events, ensure and develop customer service, legal protection and security, as well as for training purposes.
- Ensuring quality and security as well as legal protection of relevant parties, and preventing as well as examining malpractices and disorders.
- Fulfilling requirements of legislation, purposes of compliance and risk management (such as contractor liability and verification of credit information, fulfilling Heltti's liabilities regarding sanctions screening).
- Secure anonymization and deletion of personal data.

Processing tasks can be outsourced to Heltti group companies and/or external service providers in accordance with and within the limits set by the data protection legislation.

Should processing be based on Heltti's justified interest, Heltti shall attend to that the processing is proportionate with regard to the data subject's interests and correlates with the reasonable expectations of the data subject.

5 REGISTER'S DATA CONTENT

Information stored on the data subject may include, inter alia, the following:

- name, social security number, sex, language, phone number, e-mail address and other necessary contact information;
- customer/cooperation/other organization represented by the data subject, customer number, title, role, department or unit;
- consents/refusals relating to marketing communication, information on channels for contacting and mailing lists;
- customer feedback, answers to questionnaires and research;
- information on invitations and participations to events (incl. possible food allergies)
- phone recordings;
- information on access rights and user role (HelttiView);
- identifiers regarding the strong authentication service used in registration;
- information on possible verification of contractor liability or credit information;
- share of ownership, control in and/or the beneficial owner of customer/cooperation partner, as well as information on applicable sanctions and nationality;
- information on offering, purchasing, using and development of services; as well as
- information relevant to the management and development of customer relationships.

Heltti may also process the following information in relation to one's online and communication behaviour:

- Monitoring online behaviour and use of services, for example, with IP address and cookies. Stored information may contain, e.g. browsed website, filled form, model of the device used, channel, such as application, mobile or internet browser, browser version, session identifier, time and duration of the session.
- Log information from the use of applications and services.
- Monitoring communication behaviour; stored information may contain e.g. opening and clicking e-mails sent by Heltti or visiting Heltti's website.

6 STORAGE TIME OF PERSONAL DATA

Heltti will store the personal data in Heltti's Customer and Marketing Register only as long as the data is regarded necessary with regard to the purposes of processing described in this data protection description, and there are legitimate grounds for the processing of data. Generally personal data may be stored until the customer or cooperation relationship between Heltti and the data subject is considered to have ended.

Event participant information is stored as part of accounting documentation for the rest of the current year and for six (6) years after that. Phone recordings are mainly stored for six months.

Obsolete and unnecessary personal data may be erased also during the customer or cooperation relationship, such as information regarding marketing activities and use of web services. Information which is obsolete or has become unnecessary in relation to its purpose or for the processing of which there are no longer grounds for, will be made anonymous or deleted securely.

7 REGULAR SOURCES OF INFORMATION

Heltti receives information to the Customer and Marketing Register primarily from the following sources:

- customer company/cooperation partner or the data subject herself/himself/themself;
- events related to the data subject's customer relationship, use of services, communications and other business transactions;
- third parties offering services related to authentication, verification or other similar services;
- the population register system of the Population Register Centre;
- other known third party sources of information, such as the Trade Register, services for verifying credit information and/or sanctions as well as other public authorities.

In addition, information received from Heltti's cooperation partners, such as insurance companies, may be added to the register.

8 REGULAR DISCLOSURE OF DATA AND THE RECIPIENT GROUPS

Data is submitted inside Heltti in accordance with the purposes described in Section 4 of this data protection description, as well as to Heltti's Direct Marketing Register and possible other data registers of Heltti, however always in accordance with the data protection legislation and the restrictions set forth therein.

Data will not be disclosed to third parties other than those participating in the production, development, or maintenance of services or communications of Heltti or on its behalf, except when such disclosure is based on an agreement, separate consent, and/or explicit regulations.

9 TRANSFER OF DATA OUTSIDE THE EU OR THE EEA

Personal information can be transferred outside the European union or the European Economic Area, for example, to the United States, in accordance with the data protection legislation and the restrictions set forth therein.

10 PRINCIPLES OF PROTECTION

Heltti applies appropriate physical, technical and administrative protection measures to protect the data from misuse.

Any physical material is stored in a locked space to which only persons with specifically granted rights have access. Digital data can only be accessed by employees, practitioners or co-operation partners specifically entitled to do so with a personal user ID and password. There are different levels of access rights, and each user is issued sufficient rights, though as limited as possible, to complete her or his work tasks.

11 THE DATA SUBJECT'S RIGHT TO PROHIBIT PROCESSING OF PERSONAL DATA AND DIRECT MARKETING

In certain situations a data subject has the right to prohibit the processing of his/her/their data on the basis of a personal special situation to the extent that the data is processed on the grounds of a customer relationship between Heltti and the data subject. The data subject may present the request for the prohibition in accordance with Section 13 of this data protection description. The request must contain a description of the special situation on the basis of which the data processing is objected.

The data subject may give Heltti channel-specific consent or prohibitions of direct marketing.

12 OTHER RIGHTS OF THE DATA SUBJECT REGARDING THE PROCESSING OF PERSONAL DATA

12.1 The data subject's right of access to the data (inspection right)

The data subject has the right to know whether his/her/their personal data is being processed and inspect what information on him/her/them has been stored in Heltti's Customer and Marketing Register. Such an inspection request must be made in accordance with Section 13 of this data protection description. The right to inspection may be declined on statutory grounds. As a general rule, there shall be no charge for exercising one's inspection right.

12.2 The data subject's right to demand rectification or erasing of data or a restriction on processing data

If the data subject can act independently, after having been informed of an error in the data or having detected such an error herself/himself/themself, the data subject is required, without undue delay and on her/his/their own initiative, rectify, erase, or supplement the erroneous, unnecessary, incomplete or obsolete personal data. Basic contact information may also be updated through MyHeltti or HelttiView services, if the data subject is a user of said services.

The data subject also has the right to demand erasing of personal data concerning him/her/them. Such an erasure shall be implemented in accordance with applicable law.

To the extent the data subject cannot rectify the personal data independently, the rectification/erasure request to Heltti shall be made in accordance with Section 13 of this data protection description.

The data subject also has the right to demand Heltti to restrict the processing of her/his/their personal data, for example, in a situation where the data subject is waiting for Heltti's response to a request to rectify or erase data.

12.3 The data subject's right to transfer data from one system to another

To the extent the data subject has provided information to Heltti's Customer and Marketing Register which are processed on the basis of the data subject's consent, the data subject has the right to receive such data mainly in machine-readable format as well as to transfer such data to another controller.

12.4 The data subject's right to make a complaint to the supervising authorities

The data subject has the right to make a complaint to the competent supervising authorities (in Finland the Office of the Data Protection Ombudsman), if the data subject regards that the data controller has not followed the applicable data protection regulations in its operations. Instructions on the complaint are described at tietosuoja.fi.

The complaint may also be filed in a EU member state of the data subject's habitual residence or place of work.

12.5 Other rights

If Heltti processes the personal data on the basis of the data subject's consent, the data subject has the right to cancel the consent by notifying Heltti of this in accordance with Section 13 of this data protection description.

13 CONTACTS

In all matters related to the processing of personal data and all situations regarding the exercising of one's own rights, the data subject should contact Heltti in MyHeltti service, by e-mail at privacy@heltti.fi, in person at a Heltti service point, or by post at the address: Heltti Oy / Data Protection, Mannerheimintie 12 A, 00100 Helsinki, Finland. When required, Heltti can request the data subject to further define their request in writing, and, if needed, the identity of the data subject can be authenticated before initiating any other measures.