



Privacy notice

Client, collaboration partner and marketing register

Updated 21 February 2019

1 Data controller

The data controller of your personal data is Polttimo Oy and its affiliated group companies i.e. Viking Malt and Senson ("Polttimo Group" or "we"). Polttimo Group is fully committed to protecting your personal data when using or processing them and recognize the importance of correct and lawful handling of personal data.

2 Contact details

Polttimo Group, Niemenkatu 18, FI-15140 Lahti, Finland

Privacy@polttimo.com

3 Name of the register

Client, collaboration partner and marketing register

4 What is the purpose and legal basis for processing your personal data?

The processing of personal data is based on an agreement or legitimate interest of Polttimo Oy (e.g. direct marketing, fraud prevention). Polttimo Group process your personal data for the following purposes:

- Managing client and collaboration partner relationships
- Planning, analyzing and development of business operations and services
- Client communication and handling of feedback
- Organize of sales and marketing events, campaigns
- Organize of opinion polls and marketing research
- Marketing of products and services, direct marketing and delivery of newsletters
- To detect and prevent fraud or misuse.



5 What data do we process?

Polttimo Group collects following information on the decision makers and contact persons of clients or collaboration partners (incl. newsletter subscribers, persons who have requested a quote or submitted a contact request, and participants of events):

- Name, title, language, company, postal address, e-mail address, phone number
- Client history (e.g., contacts, participation in events)
- Direct marketing permissions and/or restrictions.

The register contains following information on decision makers and contact persons on potential client companies and communities:

- Name, title, company, postal address, e-mail address, phone number
- Information about the data subject's duties and position in business life or a public office
- Direct marketing permissions and/or restrictions.

Data is primarily collected from you by phone, in meetings, or by other equivalent means. Data is also collected in connection with the conclusion of the client or collaboration agreement and otherwise obtained during client/collaboration relationship. Personal data may also be collected and updated from public and private registers.

6 To whom do we disclose or transfer data, and do we transfer data outside the EU or EEA?

We use services of service providers for, e.g., maintaining newsletter mailing lists and client and collaboration partner information and for processing information of persons participating in events. In accordance with the data protection agreement, each service provider can only process personal data to the extent that is necessary for the provision of the service in question.

Subsidiaries of Polttimo Oy i.e. Viking Malt, Senson process personal data of only to extent it is required to co-operation and client relations for the concerned subsidiary. Data may be disclosed to chosen co-operation partners in conformance with applicable legislation, if individual has not restricted disclose. Personal data is not transferred to countries outside the EU or EEA.

7 How do we protect the data and how long we store data?

Only those of our employees, who on behalf of their work have the right to process personal data, are entitled to use the systems containing personal data. Each user has a personal username and password. The data is collected into databases, that



are secured with firewalls, passwords and other technical measures. The databases and their backups are in locked premises secured by access control and camera surveillance and can be accessed only by certain pre-designated persons.

We ensure data protection with data processing agreements concluded with subcontractors that process personal data.

We store personal data for as long as it is necessary due to the purpose of use (e.g. client relationship), unless legislation obligates us to store personal data for a longer period of time (e.g., on the basis of responsibilities and obligations related to special legislation, accounting responsibilities, or reporting obligations).

The personal data collected on decision makers and contact persons on potential client companies and communities is stored permanently within the limits of the law. We evaluate the need to store data regularly considering the applicable legislation. In addition, we take care of such reasonable measures which ensure that no incompatible, outdated or inaccurate personal data, taking into account the purpose of the processing, is stored in the register. We correct or erase such data without delay.

8 What are your rights as a data subject?

You can contact us if you have any questions related to personal data processing. Additionally, you have the right to contact us if you wish to:

- Access, correct or delete your personal data
- Insofar as the processing is based on your consent, you also have the right to withdraw your consent or receive your data in order to transfer data to another data controller (right to data portability). Withdrawing your consent does not affect the lawfulness of processing based on consent before its withdrawal
- Restrict or object the processing of your personal data.

Additionally, you have a right to lodge a complaint with the supervisory authority concerned in the EU Member State of your habitual residence, place of work or place of the alleged infringement, if you consider that the processing of personal data relating to you infringes applicable data protection regulation.

9 Whom can I contact?

The contacts and requests concerning this privacy notice must be submitted in writing using the contact details mentioned in section 2.