

PRIVACY POLICY

This is a combined privacy policy, in accordance with valid data protection legislation, and an informative document for the current and potential clients of Renor Oy and our subsidiaries as well as for the individuals acting as the contact persons of said clients.

Should there be any changes to the data processing policies of Renor Oy or to relevant legislation, this privacy policy may be updated. For our privacy policy valid at each time, please visit our website at www.renor.fi/en.

CONTROLLER

Renor Oy (business ID 2343526-9)
 Kiinteistö Oy Lahden Askotalot (business ID 2877517-4)
 Kiinteistö Oy Lahden Liesitehdas (business ID 2604806-1)
 Kiinteistö Oy Lahden Teollisuuskeskus (business ID 0719369-3)
 Kiinteistö Oy Tikkurilan Silkki (business ID 2877518-2)
 Each as a respective controller

Any communication related to data protection should be addressed to Renor Oy / Tietosuoja-asiat, Askonkatu 9 E, FI-15100 Lahti, Finland or sent via e-mail to legal@renor.fi with the header "*Tietosuoja-asiat*" ('Matters concerning data protection').

NAME OF DATA FILE

Asiakas-, yhteistyökumppani- ja markkinointirekisteri ('Client, cooperation partner and marketing data file')

PURPOSE OF, AND GROUNDS FOR, PROCESSING PERSONAL DATA

Personal data is processed for the purposes of exercising the rights and obligations related to a lease, service agreement or other agreement between the controller and the client/cooperation partner, implementing measures preceding the conclusion of an agreement and/or realising the legitimate interest of the controller.

The personal data of contact persons working in enterprises or corporations considered the controller's clients and cooperation partners is processed in the data file. The controller uses the personal data to send newsletters, event invitations and other marketing-related communications, promote services and events, keep in touch with potential and current clients and to manage, maintain and develop relations with its clients/cooperation partners.

PERSONAL DATA TO BE PROCESSED

The information processed in the data file includes:

- name and contact information, such as first and last name, address, telephone number and e-mail address
- title/profession and the represented enterprise or corporation
- direct marketing consents and bans
- customer relationship information, such as invoicing and payment information, client feedback and communications
- personal identification number and credit report, if the client is a private customer and has a contractual relationship with Renor Oy
- information on any business prohibitions or debt restructuring
- in real estate transactions, information required by the Finnish Act on Detecting and Preventing Money Laundering, such as information on the client's identification (copy of identification card, for example), PEP information (in other words, information on whether the individual, their family member or business partner is or has been a politically exposed person) and information on the actual beneficiary

DATA SOURCES

The data subject provides the data in the agreement concluded with the controller, in oral or written communications with the controller or through other means. Data is also collected in connection with signing up for or participating in events, providing feedback or communicating, or later during the customer or cooperation relationship. In addition, personal data can be collected and updated from the data files of our cooperation partners as well as authorities and enterprises providing services related to personal data.

DISCLOSURE OF DATA

As a rule, the controller will not disclose the contents of the data file to outsiders. However, the controller may disclose personal data to authorities or other parties as allowed and obligated by legislation.

In processing the personal data referred to in this document, the controller may use external processors and, for this purpose, disclose data to its cooperation partners that are assigned by the controller to process the data on behalf of the controller and in accordance with the controller's instructions. The controller always ensures the appropriate processing of personal data and makes certain that the processors have implemented the appropriate technological and organisational measures to enable confidential processing of the data and a sufficient level of data security. There is a valid personal data processing agreement between the controller and the external processor.

The data will not be processed or transferred outside the European Union or the European Economic Area unless required by the technical implementation of the processing.

PROCESSING OF DATA

The personal data of the data subjects will not be processed for purposes other than those for which the personal data was originally collected. In addition, the controller aims to ensure that no personal data that is unnecessary, expired or inaccurate, having regard to the purposes for which it is processed, is stored.

The personal data is stored for as long as is necessary for the purpose of processing the personal data. In principle, data collected on the basis of an agreement can be stored for ten (10) years after the termination of the contractual relationship.

Personal data may be stored in a service provided by a third party selected by the controller if said service is considered secure and in compliance with generally accepted data protection policies. The controller and the third party in question shall ensure the confidentiality and data security of the personal data and its processing.

Only the employees of the controller and cooperation partners authorised due to their work and/or duties to process the data in this data file may access the system containing the personal data.

The data is collected into databases protected by firewalls, passwords and other technical means. The physical locations of the databases are locked and monitored.

RIGHTS OF THE DATA SUBJECT

In accordance with the applicable data protection legislation and under the stipulated preconditions, the data subject has the right to:

- be informed of the processing of their personal data
- access their personal data stored in the data file
- request rectification of inaccurate personal data
- request restriction of processing or the erasure of their personal data
- object to processing of their personal data
- refuse the use of their personal data for direct marketing

Any requests related to exercising the rights of the data subject should be sent, in writing and signed, to:

Renor Oy,
Askonkatu 9 E
FI-15100 Lahti, Finland

If necessary, the controller may ask the data subject to specify their request in writing and verify the data subject's identity before processing the request. The controller may also refuse the request on grounds stipulated in data protection legislation.

The data subject has the right to lodge a complaint with a competent data protection supervisory authority regarding the controller's processing of personal data.