

CONTROLLER'S RECORD OF PRIVACY POLICY

Customers and stakeholders

1. Controller

Okmetic Oy
Business ID: 0596885-4
Piitie 2, 01510 Vantaa, Finland
Telephone: +358 9 502 800
Email: communications@okmetic.com
(later referred to as "Okmetic" or "Company")

2. Contact person responsible for register issues

Markus Virtanen
Piitie 2, 01510 Vantaa, Finland
Telephone: +358 9 502 800
Email: markus.virtanen@okmetic.com

3. Data protection officer DPO

Markus Virtanen
Piitie 2, 01510 Vantaa, Finland
Telephone: +358 9 502 800
Email: markus.virtanen@okmetic.com

4. Name of the register

Controller's record of privacy policy - Customers and stakeholders

5. The grounds for processing of personal data and legitimate interest

The grounds for processing personal data of customers and stakeholders are the managing of customer and stakeholder relationships related to Okmetic's business activities. Data is used also for communications and marketing as well as, at a general level, to develop services to better meet the needs of customers and stakeholders.

Okmetic processes personal data according to applicable legislation, such as Data Protection Act and GDPR. Personal data may be processed to fulfill responsibilities related to applicable laws as well as orders and instructions given by competent authority.

Controller is justified to process personal data based on agreement, consent of the data subject or the legitimate interest of the controller. Legitimate interest means a need to enforce and maintain the obligations and rights of contractual parties.

6. Content of the register

Processing of the customers' and stakeholders' register may include following personal data:

- basic information of the registered person (such as name, role, title)
- contact details (such as address, phone number, email address);
- information concerning companies' contact persons (such as information of the employer and the professional position of the registered person)
- other information collected with the consent of the registered person.

7. Regular sources of information

Information involving registered person will regularly come from the person himself or his/hers employer, customer and stakeholder organizations, commercial registers and publicly available sources such as Internet pages. Information is also received from agreements and purchase orders.

Personal data of customers' and stakeholders' employees, information concerning bans on business operations, representation rights and positions of responsibility may be received from Trade Register, Asiakastiето Oy and corresponding resources.

8. Regular disclosure

Data will not be regularly disclosed to third parties. Data may be disclosed to competent authorities according to applicable laws.

9. Transfer of information outside EU/ETA -area

Okmetic may share personal data within Okmetic Group for the purpose of developing and managing customer and stakeholder relationship within the limitations of applicable legislation. In these cases adequate level of protection is ensured by using EU Commission's standard contractual clauses.

10. Principles of protecting the register

Access to the register consisting of personal data is limited only to those company's employees, who are entitled to process the personal data as a part of their duties. Register has been protected with necessary technical and organizational measures. Each user has user-ID and password. Data is collected to databases, which are protected by firewalls, passwords and other technical means. The system and recovery copies as well as paper copies of data are situated in locked facilities and access to data is limited to persons, who are entitled to process the personal data as a part of their duties.

11. Retention of data

Okmetic retains personal data for a reasonable period of time, not exceeding any legal requirements or limitations. Personal data will be deleted in accordance with Okmetic's data security rules.

Data is retained only for as long as is necessary to fulfill the purpose of this customers' and stakeholders' register.

As a rule, personal data will be deleted within one year after the customer and stakeholder relationship has ended. Personal data will then be deleted, unless Okmetic is liable to save the data based on law or obligations and responsibilities of agreement between the parties.

12. Rights of the registered person

Registered person may check his/her personal data and have incorrect data rectified or deleted with legitimate grounds. He/she may also withdraw or alter consent to process the data. Controller may, on its own initiative or on the request of the registered person complete, rectify or delete incomplete, inaccurate or outdated personal data.

According to the General Data Protection Regulation registered person has the right to resist the processing of the personal data or request restriction of processing of the data and to lodge a complaint of the data processing with a competent data protection authority

13. Contacts

All contacts and requests concerning this Controller's record of privacy policy should be presented in writing or personally to the contact person named on point 2.

14. Changes

If Okmetic makes changes to this record of privacy policy, changes will be updated to this record.