

## Privacy Notice of Customer, Marketing and Stakeholder Register

Parmaco may update this Privacy Notice from time to time. You are encouraged to periodically review this Privacy Notice to stay informed of updates.

### 1 Controllers

Companies below act as independent or joint controllers for the processing of personal data as described in this Privacy Notice. Companies have entered into agreement where the roles and liabilities in each case is defined.

Parmaco Group Oy, 2945829-3  
 Parmaco Oy, 2465039-0  
 Parmaco Production Oy, 2465036-6  
 Parmaco AB, 559009-7290  
 Fixcel Group Oy, 2662116-3

(hereafter "Parmaco")

### 2 Contact details of register matters

Tel. +358 20 734 0011  
 info@parmaco.fi

### 3 Register name

Parmaco's Customer, Marketing and Stakeholder Register

### 4 Purpose and justification of processing data and register content

Data subjects are the customers, subcontractors, partners and other stakeholders of Parmaco. Providing personal data is a requirement for parties contractual and/or customer relationship. Without the necessary information Parmaco is not able to provide the product and/or service.

PERSONAL DATA	PURPOSE OF PROCESSING	LEGAL BASIS
<b>Basic information</b> such as name, date of birth, customer number, username and/or other identifier, preferred language  <b>Contact information</b> such as e-mail address, phone number, address information  <b>Information related to the company's contact persons</b> , such as access to construction site or	Delivering and improving our products and services according to your needs	Legitimate interest
	Fulfilling our contractual and other promises and obligations	Performance of a contract
	Billing	
	Direct marketing	Consent (private persons) or legitimate interest (companies)
	Bookkeeping	Legal obligation

<i>Parmaco's working premises</i>		
<b>Possible direct marketing opt-outs</b>	Serving customers interest of not receiving direct marketing	Legitimate interest in being able to fulfil our legal obligation to ensure opt-out from direct marketing in accordance with the law
<b>Information you provide in connection with the events we host, registration data, special diets, invoicing data</b>	Organizing events	Legitimate interest in being able to host events and invoice when applicable
		Consent regarding health data (e.g. allergies)
<b>Information of the customer relationship and the contract</b> such as information of past and current contracts and orders, correspondence with you and other communication, payment information and other information which you have voluntarily provided to our systems	Compliance with our contractual and other promises and obligations	Performance of a contract
	Billing	
	Managing the customer relationship	Legitimate interest in managing and developing the customer relationship
	Bookkeeping	Legal obligation
<b>Data of the connection and terminal device you are using</b> such as the IP address, device ID or other device identifier and cookies	Targeting advertising in our online services	Consent
	Analyzing and profiling behavior	

## 5 Regular information sources

Information is primarily gathered from concerned person by e-mail, phone, personally or in another similar way. The register is compiled of information obtained under the conclusion of the customer, subcontractor or partnership agreement with Parmaco and other information obtained during the relationship.

For the purposes described in this privacy notice, personal data may also be collected and updated from public and private registers such as authorities, credit information companies, contact information service providers or other publicly available sources and based on information received from authorities or other third parties within the limits of the applicable laws and regulations. Such updating of data is performed manually or by automated means.

## 6 Data transfer outside EU or EEA and regular information disclosures

Parmaco doesn't, in principle, disclose data from the register to external parties, unless it's necessary for providing our services and to comply with our contractual or legal obligations. For legitimate reasons Parmaco may disclose some personal data to affiliated companies, logistics partners/haulers, legal or financial advisors or similar partners or authorities, which act as joint

or independent controllers (depending on the situation). Parmaco uses subcontractors that process personal data on our behalf. Parmaco has partly outsourced the IT-management to an external service provider, on whose administrated and secured server the personal data is/can be stored.

Parmaco does not primarily transfer personal data outside the EU/EEA. However, the marketing and IT management systems Parmaco uses may allow the service provider to access data from outside the EU/EEA. When personal data is processed outside the EU or the EEA, Parmaco will ensure that the service provider is committed in complying with the EU Commission's standard clauses on the processing of personal data.

## 7 Register protection principles and data storage time

Only persons with a right to process customer information due to their position have access to the information system containing customer information. Each user has one's own combination of username and password. Information is gathered in databases protected with firewalls, passwords and other technical means. Databases and their backup copies are stored in locked premises where only certain in advance named persons have access to.

Personal data is stored as long as needed to serve its purpose, considering storage times set in the law. The storing period is primarily 10 years from the end of contractual relationship or in accordance with the bookkeeping obligations. Parmaco regularly estimates the need for data storage taking into account the applicable legislation. In addition, Parmaco take care of such reasonable actions that ensure no incompatible, outdated or inaccurate personal data is stored in the register considering the purpose of the processing. Parmaco corrects or erases such data without delay.

## 8 Rights of Data Subject

Data subject has the right to inspect the personal data stored in the register concerning itself and the right to demand rectification or erasure of the data. If data subject has access to the data, data subject may edit the data by itself. Insofar as the processing is based on consent, the data subject also has the right to withdraw or change the consent. Withdrawing the consent does not affect the lawfulness of processing before the withdrawal of the consent.

A data subject has the right to object or to demand restriction of the processing of the data and to lodge a complaint with the supervisory authority.

On grounds relating to particular situation data subject also has the right to object other processing activities when the legal basis of processing is legitimate interest. In connection with the request, data subject shall identify the specific situation, based on which data subject objects to the processing. Parmaco can refuse the request of objection only on legal grounds.

## 9 Contact person

All contacts and requests concerning this privacy notice shall be submitted in writing or in person to the person mentioned in section two (2).

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