

12.4.2019

MARKETING REGISTER PRIVACY NOTICE

1. Controller

KOKO Lahti Ltd / Lahti Sibelius Hall
Ankkurikatu 7
15140 Lahti

Petra Peltovako
Marketing and Communications Director
Ankkurikatu 7, 15140 Lahti, Finland
tel. +358 44 416 3298
petra.peltovako@sibeliustalo.fi

2. Matters concerning the register

Our marketing department will answer any questions or feedback concerning the register within two working days.

3. Register name

KOKO Lahti Ltd Marketing Register

4. Purpose of processing personal data

The purpose of processing personal data is to maintain customer relationships, to fulfil the rights and obligations of the customer and KOKO Lahti Ltd and its auxiliary businesses, and to process personal data, and to carry out data protection in accordance with valid laws for purposes associated with network services, research, directing advertising and/or direct marketing by KOKO Lahti Ltd and/or its partners based on customer data using KOKO Lahti Ltd's communications channels and services without disclosing personal data to a third party. The processing of personal data will not be subject to automated decision-making. The controller of the register alone will process the data and utilise subcontractors acting for and on behalf of the controller in the processing of personal data.

5. Legal basis of processing personal data

The legal basis of processing personal data are the following legislative bases concerning the processing of personal data and data protection:

- (i) The data subject has given his or her consent to process his or her personal data.
- (ii) Processing is necessary in order to enforce a contract with the data subject as a party, or in order to carry out procedures at the request of the data subject prior to the enforcement of the contract.
- (iii) Processing is necessary in order to carry out legitimate interests of the controller of the register or a third party.

6. Data content of the register

The register may contain the following data:

- Name
- Address
- Telephone



12.4.2019

- Email address
- Additional information
- Date of birth
- Gender
- Language
- Company and title
- Company address

7. Regular data sources of the register

The register is compiled using the customer database of KOKO Lahti Ltd and publicly available Internet sources. In the event of collection an address may be checked from the population register. KOKO Lahti may remove such customer data from its register that has not been used for a long time.

8. Regular disclosure of data

The controller of the register will not disclose the customer data to any third parties unless it is required by the Finnish authorities. The data will not be disclosed to areas outside the EU or the EEA.

9. Deletion of data

Data may be deleted at the customer's request or if the customer relationship has ended.

10. Register security principles

Personal data is classified as confidential. The register is located in the data network and equipment of KOKO Lahti Ltd that are protected by a fire wall provided by the City of Lahti and other required technical measures. The staff are bound by an NDA defined in the employment contract.

11. Retention period of personal data

Personal data in the register is only stored for as long as it is necessary for the original and compatible purposes the data was collected. Furthermore, personal data is, in any case, stored in accordance with the possible statutory storage period. The controller will regularly evaluate the necessity of storing data according to internal practices. Furthermore, the controller will take all possible, reasonable measures to ensure that unclear, incorrect or outdated personal data is deleted or rectified without delay as regards the purpose of the processing.

12. Rights of the data subject

The data subject has rights in accordance with the Finnish laws on data protection and the following legal bases in accordance with the GDPR:

- (a) the right to have a confirmation from the controller that data relating to the data subject will be processed or that it will not be processed, and if the personal data is processed, the data subject will have access to his or her personal data and the following information: (i) the purpose of processing; (ii) categories of the personal data; (iii) recipients or groups of recipients to whom the data has been disclosed or will be disclosed; (iv) to the extent possible, the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period; (v) the data subject's right to request the controller to rectify or remove the data about him or her, or restrict the processing of the personal data or object to processing; (vi) the right to lodge a complaint with the supervisory authority; (vii) if



12.4.2019

personal data is not collected from the data subject, any available information as to its source (GDPR 15 art.);

- (b) the right to withdraw his or her consent at any time. The withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal (GDPR 7 art.);
- (c) the right to obtain from the controller without delay the rectification of inaccurate personal data concerning him or her and the right to have incomplete personal data completed, including by means of providing a supplementary statement taking into account the purposes of the processing (GDPR 16 art.);
- (d) the right to obtain from the controller the erasure of the personal data concerning him or her without delay assuming that (i) the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed; (ii) the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing; (iii) the data subject objects to the processing on grounds relating to his or her particular situation and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing for direct marketing purposes; (iv) the personal data has been unlawfully processed; or (v) the personal data has to be erased to comply with a legal obligation in Union or Member State law to which the controller is subject (GDPR 17 art.);
- (e) the right to obtain from the controller restriction of processing, if (i) the accuracy of the personal data is contested by the data subject, in which case the processing is restricted for a period enabling the controller to verify the accuracy of the personal data; (ii) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of its use instead; (iii) the controller no longer needs the personal data for the purposes of processing, but it is required by the data subject for the establishment, exercise or defence of legal claims; or (iv) the data subject has objected to processing on grounds relating to his or her particular situation pending the verification whether the legitimate grounds of the controller override those of the data subject (GDPR 18 art.);
- (f) the right to obtain the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and the right to transmit the data to another controller without hindrance from the controller to which the personal data has been provided, where the processing is based on consent and the processing is carried out by automated means (GDPR 20 art.);
- (g) the right to lodge a complaint with the supervisory authority if the data subject considers that the processing of the personal data relating to him or her infringes the General Data Protection Regulation (GDPR 77 art.)

Any questions regarding the rights of the data subject should be directed to the controller's contact person mentioned in section 1.

This privacy notice was last updated on 8 November 2018. KOKO Lahti Oy reserves the right to change the data protection practices described in this document and update these terms accordingly.

