

## PRIVACY POLICY

Nordtreat Group Oy respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we collect, process, and share your personal data and will tell you about your privacy rights in connection with the products and services provided by Nordtreat Group Oy (“**we**” or “**us**”) to its customers as well as on our website.

This policy also applies to the processing of personal data of our website visitors as well as the representatives of our customers and suppliers.

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### 1. WHO IS THE DATA CONTROLLER?

The data controller for the processing described in this policy is

<b>Name</b>	Nordtreat Group Oy
<b>Business ID</b>	3259989-8
<b>Address</b>	Mestarintie 11 A, FI-01730 Vantaa

If you have questions regarding this privacy policy, please contact our contact person by email at [aki.borgentorp@nordtreat.com](mailto:aki.borgentorp@nordtreat.com) or at [info@nordtreat.com](mailto:info@nordtreat.com).

If you visit our pages, communicate, or otherwise interact with us on social medias such as Facebook and LinkedIn or other platforms, please make sure to consult the specific privacy policy presented on such social medias or platforms. You should be aware that sometimes we may have a joint controllership with the publisher of the social media or platform in question.

We process information related to maintaining customer relationships and marketing our services to businesses. We process the information of our customers, potential customers, representatives of partner organizations and users of our products and services.

### 2. INFORMATION WE COLLECT AND HOW WE COLLECT IT

## 2.1 Customers

If you are our customer, in the following we will tell you which types of personal data we may collect about you and how we collect it. In section 3 we have a table explaining the purposes for which we process your personal data and the lawful bases we rely on.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- A. **Identity Data** includes your full name and date of birth, customer number, your employer and job title.
- B. **Contact Data** includes email address, telephone number, and home address.
- C. **Customer Data** includes orders made or services used by you, our individual contacts with you (such as phone conversations), discussions and contract negotiations, your preferences, feedback and survey responses, your participation in competitions, activity on our website and social media platforms such as Facebook, and demographic data.
- D. **Purchase Information** includes the products and services you have purchased from us.
- E. **Technical Data** includes IP address, your login data, browser type and version, application version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- F. **Usage Data** includes information about how you use and interact with our website, products and services, as well as our social medias such as Facebook.
- G. **Marketing and Communications Data** includes your preferences in receiving marketing from us and our partners and your communication preferences.
- H. **Camera recordings** includes camera surveillance recordings of some areas of our premises.

In most situations the information is collected directly from you when you visit our website or interact with us on social medias, purchase our products and services, request marketing from us or otherwise communicate with us. We may also receive data from the company you represent as well as from public commercial registers, from marketing data companies, as well as, from number and address information providers.

As you interact with our website or services, we may automatically collect Technical Data and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and similar technologies. For more information on how we use cookies on our website, please refer to our separate cookie policy. Information on your interests may be received from commercial data providers or market research agencies.

## 2.2 Suppliers' personnel

If you represent a supplier that provides us with products and/or services that we purchase, in the following we will tell you which types of personal data we may collect about you and how we collect it. In section 3 we have a table explaining the purposes for which we process your personal data and the lawful bases we rely on.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- A. **Identity Data** includes your full name and signature and the details of your organisation.
- B. **Contact Data** includes work email address, work-related telephone number, and work street address.
- C. **Supplier Data** includes products and services provided by you or your organisation, related contracts, discussions and contract negotiations, our individual contacts with you (such as phone conversations), your preferences, feedback and survey responses, your position in the supplier's organisation, and other necessary professional information such as certificates and authorisations.
- D. **Purchase Information** includes the products and services we have purchased from you or your organisation and details of agreements between your organisation and us.
- E. **Technical Data** includes IP address, your login data, browser type and version, application version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- F. **Marketing and Communications Data** includes your preferences in receiving marketing from us and our partners and your communication preferences.
- G. **Camera recordings** includes camera surveillance recordings of some areas of our premises.

In most situations the information is collected directly from you when you interact with us representing your organisation and when negotiating and closing commercial contracts related to the supply of the products and services of your organisation. We may also collect information from your employer. We may also receive data from the company you represent and public commercial registers, from marketing data companies and from number and address information providers.

As you interact with our website or services, we may automatically collect Technical Data and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and similar technologies. For more information on how we use cookies on our website, please refer to our separate cookie policy. Information on your interests may be received from commercial data providers or market research agencies.

### 3. THE PURPOSES AND THE LAWFUL BASES

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- i. Where we need to perform a contract, we are about to enter into or have entered into with you cf. GDPR Article 6 (1) (b).
- ii. Where you have provided your consent cf. GDPR Article 6 (1) (a) or Article 9 (2) (a).
- iii. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests cf. GDPR Article 6 (1) (f).

We have set out below a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

### 3.1 Customers

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>To manage and perform the contract with you including:</p> <ul style="list-style-type: none"> <li>• To register you as a new customer</li> <li>• to allow you to purchase our products and services,</li> <li>• to order and deliver our products and services to you</li> <li>• to manage and collect payments for our products and services</li> <li>• to entitle you to customer advantages, provide customer service and support, including administration of complaints</li> <li>• and generally, to comply with our obligations and exercise our rights under agreements entered into with you</li> </ul>	<p>(A) Identity data (B) Contact data (C) Customer data (D) Purchase information (F) Marketing and communications data</p>	<p>Performance of a contract with you or to take steps at the request of you prior to entering a contract.</p> <p>Compliance with a legal obligation (Bookkeeping, Accounting and Tax)</p>
<p>To analyse and improve our business procedures and practices</p>	<p>(A) Identity data (B) Contact data (D) Purchase information</p>	<p>Necessary for our legitimate interest to analyse and improve our business, including our products and services</p>
<p>To enable you to access and interact with our website</p>	<p>(E) Technical data</p>	<p>Necessary for our legitimate interest to provide you access to our website.</p>
<p>To enable you to communicate with us on the website, via e-mail, social media or otherwise, and to allow you to</p>	<p>(A) Identity data (B) Contact data (F) Marketing and Communications data</p>	<p>Necessary for our legitimate interest to communicate with you and to enable you to participate in competitions and surveys at your own discretion</p>

participate in competitions and surveys		
To send you newsletters or other marketing	(A) Identity data (B) Contact data (C) Supplier data (F) Marketing and Communications data	Necessary for our legitimate interests to send you relevant marketing.  We will only send you marketing by e-mail or other means of electronic communication if you have given us your consent, or we are otherwise allowed to under the Act on Electronic Communications Services
To administer and protect our business and website (including troubleshooting, data analysis, testing and system maintenance)	(A) Identity data (B) Contact data (E) Technical data (H) Usage data	Necessary for our legitimate interests for running our business, provision of administration and IT services, network security and to prevent fraud
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.	(A) Identity data (B) Contact data (C) Customer data (D) Purchase information (E) Technical data (F) Marketing and Communications	Necessary for our legitimate interests to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to improve our marketing strategy.  We will only apply cookies – other than strictly necessary technical cookies - if you have provided your consent.
To deliver relevant and targeted marketing, advertisements, and website content, on our and third-party sites, to you and measure or understand the effectiveness of the advertising we serve to you.	(A) Identity data (B) Contact data (C) Customer data (E) Technical data (F) Marketing and Communications data	Necessary for our legitimate interests to decide our marketing strategy and to target our marketing communication to you to fit with your preferences.  We will only apply cookies – other than strictly necessary technical cookies - if you have provided your consent.  We will only use your health information for targeted marketing if you have provided your consent.
Camera recordings	(A) Identity data (your image and behaviour)	Necessary for our legitimate interests to ensure safety for our employees and customers and for crime prevention and detection purposes

To the extent that we have referred to our legitimate interest as the legal basis for the processing of personal data specified above we have conducted a balancing test for those interests to ensure that our interest is not overridden by your interests or fundamental rights and freedoms. If you wish to receive more information on the balancing test, please contact us by email at the address specified above in Section 1 if you wish to receive more information on the balancing test.

### 3.2 Suppliers' personnel

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>To manage and perform the contract with you including:</p> <ul style="list-style-type: none"> <li>• to register your organisation as our supplier</li> <li>• to negotiate, enter into, and terminate commercial contracts with your organisation,</li> <li>• to purchase and receive products and services from your organisation,</li> <li>• to manage payments between our organisations,</li> <li>• to facilitate communication and customer support between our organisations,</li> <li>• and generally, to comply with our obligations and exercise our rights under agreements entered into with your organisation.</li> </ul>	<p>(A) Identity data (B) Contact data (C) Supplier data (D) Purchase information (E) Marketing and communications data</p>	<p>Performance of a contract with you or to take steps at the request of you prior to entering a contract.</p> <p>Compliance with a legal obligation (Bookkeeping, Accounting and Tax)</p>
<p>To analyse and improve our business procedures and practices</p>	<p>(A) Identity data (B) Contact data (D) Purchase information</p>	<p>Necessary for our legitimate interest to analyse and improve our business, including our products and services</p>
<p>To enable you to access and interact with our website</p>	<p>(E) Technical</p>	<p>Necessary for our legitimate interest to provide you access to our website.</p>

To enable you to communicate with us on the website, in e-mail, via social medias or otherwise, and to allow you to participate in competitions and surveys	(A) Identity data (B) Contact data (I) Marketing and Communications data	Necessary for our legitimate interest to communicate with you and to enable you to participate in competitions and surveys at your own discretion
To send you newsletters or other marketing	(A) Identity data (B) Contact data (C) Supplier data (G) Marketing and Communications data	Necessary for our legitimate interests to send you relevant marketing.  We will only send you marketing by e-mail or other means of electronic communication if you have given us your consent, or we are otherwise allowed to under the Act on Electronic Communications Services.
To administer and protect our business and website (including troubleshooting, data analysis, testing and system maintenance)	(A) Identity data (B) Contact data (G) Technical data	Necessary for our legitimate interests for running our business, provision of administration and IT services, network security and to prevent fraud
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.	(A) Identity data (B) Contact data (C) Supplier data (D) Purchase information (E) Technical data (G) Marketing and Communications	Necessary for our legitimate interests to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to improve our marketing strategy.  We will only apply cookies – other than strictly necessary technical cookies - if you have provided your consent.
To deliver relevant and targeted marketing, advertisements, and website content, on our and third-party sites, to you and measure or understand the effectiveness of the advertising we serve to you.	(A) Identity data (B) Contact data (C) Supplier data (E) Technical data (G) Marketing and Communications data	Necessary for our legitimate interests to decide our marketing strategy and to target our marketing communication to you to fit with your preferences.  We will only apply cookies – other than strictly necessary technical cookies - if you have provided your consent.  We will only use your health information for targeted marketing if you have provided your consent.

Camera recordings	(A) Identity data (your image and behaviour)	Necessary for our legitimate interests to ensure safety for our employees and customers and for crime prevention and detection purposes
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#### 4. SHARING OF COLLECTED DATA

We may disclose your personal data within Nordtreat Group where required for the above specified purposes. We base this processing on our legitimate interest to transmit personal data within the Nordtreat Group for internal administrative purposes, such as for the purposes of using centralized IT systems and alignment of business operations and strategies.

We may disclose personal data to third parties:

- when it is necessary for the purposes listed in Section 3
- when required by law we may disclose your personal data to public authorities such as tax authorities and law enforcement authorities
- when it is necessary for our suppliers to manufacture the products ordered
- when you make payments on our website, your payment is administered by a payment service provider acting as an independent controller
- At our website, cookies may be set and data collected or transferred to third parties. Please make sure to consult our cookie policy and cookie settings available at the website to find information of these third parties and the purposes for which data is collected. We will only apply cookies – other than strictly necessary technical cookies - if you have provided your consent.
- We may assign your personal data, to any person or entity that acquires all or substantially all of our business, stock or assets, or with whom we merge.
- when we believe in good faith that disclosure is necessary to establish or exercise our legal rights or defend against legal claims, protect your safety or the safety of others, investigate fraud, or respond to a government request.

We share information, including personal data, with our trusted third-party service providers that we use to provide services to us and process your data on our behalf and under our instruction, e.g. hosting of data and maintenance of IT-systems, administration of our website, communication, planning and displaying marketing, administration of our interests at social medias, customer support and service, payment processing, delivery of products to you, analytics and other services for us. These third-party service providers may have access to or process your personal data for the purpose of providing these services for us. We do not permit our third-party service providers to use the personal information that we share with them for any other purpose than in connection with the services they provide to us. We have entered into data processing agreements with our data processors.

#### 5. TRANSFERS TO THIRD COUNTRIES

We will not transfer your personal data to recipients outside EU or EEA unless we have ensured compliance with GDPR Chapter V.

Some of our third-party service providers are established outside the EEA, including in the US, so their processing of your personal data will involve a transfer of data outside the EEA. However, to ensure that your personal information receive an adequate level of protection we have ascertained that sufficient safety measures have been implemented to allow for the transfer, including where the European Commission have deemed the country to provide an adequate level of protection for personal data; or by use of specific contracts approved by the European Commission (Standard Contractual Clauses) which give personal data essentially equivalent protection as it has in Europe.

We use the services of the following companies for marketing and analytical purposes and therefore they may access your personal information:

<b>Company</b>	<b>Service</b>	<b>Geographical scope of processing</b>	<b>Data transfer mechanism</b>
Hubspot, Inc.	Marketing service	United States of America	Data Privacy Framework Program  (The European Commission adequacy decision)
Google	Web analytics service	United States of America	Data Privacy Framework Program  (The European Commission adequacy decision)

If you require further information about on our current data processors established outside the EEA and the safety measures in place to allow for the transfer of personal data, you can request it from us – please send your request to us by email at the address specified above in Section 1.

## 6. DATA RETENTION

We retain the personal data we collect where we have an ongoing legitimate need to do so for the purposes set out in Section 3. When we have no ongoing legitimate need to process your personal information, we will either delete or anonymise any collected personal data.

If the purpose specified in Section 3 no longer exists, your data will be deleted or anonymised without delay. If you have consented to receive marketing, we will retain proof of your consent for 2 years after the last time we relied on your consent to send marketing. We will stop sending you e-marketing when you withdraw your consent.

Data may be only retained for a longer period than specified above if we are legally obliged to do so, or if retention is necessary to establish, exercise or defend legal claims.

### 6.1 Customers

Your personal data will be retained for a maximum time period as follows:

1. Personal Identification Data, contact data and customer data will be retained for the duration of the customer relationship or until we receive notice of the contact person for the company changing. After the end of the customer relationship, we will delete the information as soon as possible;
2. Purchase information will be retained for 10 years from its collection;
3. Technical and Usage Data will be retained for 2 years from the collection of data;
4. Communication Data will be retained for 10 years from the collection of data.

## 6.2 **Suppliers' personnel**

1. Identity Data will be retained for 10 years from its collection;
2. Contact Data will be retained for 10 years from its collection;
3. Supplier Data will be retained for 10 years from its collection;
4. Purchase information will be retained for 10 years from its collection;
5. Technical Data will be retained for 10 years from the collection of data;
6. Communication Data will be retained for 10 years from the collection of data.

## 7. **HOW TO EXERCISE YOUR DATA PROTECTION RIGHTS**

You have certain options available to you when it comes to your personal information. Below is a summary of those choices, how to exercise them and any limitations.

Under certain circumstances, you have the right to:

- Request access to your personal information. This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected. Please note that the law prohibits that we delete entries in medical records.
- Request us to stop using your personal information for direct marketing. We will never sell or otherwise disclose personal information to other parties for direct marketing without your explicit separate consent.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it.
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party (also known as data portability).
- Where our processing is solely based on your specific consent you have the right to withdraw your consent at any time. Such withdrawal will not affect the lawfulness of processing based on consent before its withdrawal.

If you wish to exercise any of the data protection rights that are available to you then please send your request to us by email at the address specified above in Section 1 and we will action your request in accordance with applicable data protection laws.

You have the right to complain to your local data protection authority if you are unhappy with our data protection practices. In Finland, you can lodge a complaint with the Office of the Data Protection Ombudsman at <https://tietosuoja.fi/en/notification-to-the-data-protection-ombudsman>.

## **8. Changes to this privacy policy**

This privacy policy may be updated from time to time to reflect changing legal, regulatory, or operational requirements. We encourage you to periodically consult our website for the latest information on our privacy practices.

If there are any material changes to this privacy policy, and you are a registered customer you will be notified by email prior to the change becoming effective.