#### **Privacy Statement**

21.12.2022

Your privacy is important to us.

In this data privacy statement, we explain what we process personal data for and what rights you have regarding the processing of your personal data.

#### 1. Data Controller

Kolster Oy Ab Business ID: 0110129-2 Salmisaarenaukio 1 00180 Helsinki

Phone: 020 137 0500 kolster@kolster.fi www.kolster.fi

### 2. Representative of the Data Controller / Contact Person

Sanna Häikiö

Phone: 040 532 2511

E-mail: sanna.haikio@kolster.fi

#### 3. Purpose of Personal Data Processing

The processing of personal data is based on the data controller's legitimate interest, contractual relationship and/or compliance with the data controller's statutory obligation. The processing of personal data may also be based on the data subject's consent, which then forms the legal basis for the processing in the applicable parts. The legitimate interest of the data controller is the right to engage in factual, justified, and legal sales and marketing activities, including related profiling.

Personal data is processed within the limits permitted by applicable legislation, e.g. For the following uses:

- Creation, maintenance, and development of the customer base/customer ship
- Data analysis
- Producing, developing, monitoring and personalizing services
- Managing assignments
- Business development
- Implementation of marketing
- Distance selling
- Customer communication
- Invoicing and monitoring and collection of payments
- Checking credit information

We only collect personal data to the extent that it is necessary for the seamless operation of our cooperation.

## 4. Information Content of the Register

The register contains the following personal data:

- First and last name, address, telephone number, e-mail address
- Date of birth
- Usernames
- Language
- Service usage information
- Information provided by the customer that facilitates the service (e.g. special diet)
- Information related to online behavior on Kolster's website and services
- Location information
- Possible other information collected with separate consent

#### 5. Data Sources

Personal data related to the customer or potential customer is collected from the person themself, from the various online services that the registered customer uses, from the registers of partners, and from authorities and companies providing services regarding personal data.

#### 6. Cookies

A cookie is a short piece of text or file that a website sends to your browser. It helps the site remember the information of your visit, such as the language you selected and other settings. The cookie makes your next visit easier and makes the site more useful for you. Cookies play an important role in terms of content.

Kolster Oy Ab uses a system that uses cookies. With their help, for example, we count the number of visitors to the pages, we can improve the content of the site and we are able to save your language choice.

### 7. Transfer of Personal Data

Personal data may be disclosed to partners / subcontractors to the extent that it is necessary for the assignment given by the customer. When we use subcontractors, we make sure that the processing of personal data takes place in accordance with data protection regulations. If we must transfer personal data outside the European Union or the European Economic Area, we ensure that the transferees comply with data protection legislation.

#### 8. Protection of the Register and Retention Period of Personal Data

The information contained in the register processed electronically is protected by firewalls, passwords and possibly other technical means generally accepted in the field of information security. Manually maintained materials are located in premises to which unauthorized

persons have been prevented from accessing. Only identified employees of the registrar and the companies acting on behalf of the data controller have access to the personal data contained in the register with the right of use granted by the data controller.

We retain personal data only as long as it is necessary to fulfill the personal data processing purposes defined in this privacy statement. Due to the obligations of the Accounting Act or other applicable law, personal data may have to be kept longer than the abovementioned period. Unnecessary and outdated personal data will be disposed of in an appropriate manner.

### 9. Rights of Data Subject

In accordance with the applicable legislation, the person entered in the register has the right to:

- Check what personal data concerning them has been stored. The request for the provision of register data must be made in writing, and a reasonable fee is charged for the inspection request, if requests are made more than once a year.
- Give and withdraw consent to the processing of personal data.
- Demand correction of incorrect information in the register. The request to correct the error must be made in writing to the controller's contact person.
- Object to the processing of personal data.
- Transfer data from one system to another. The request must be made in writing and a reasonable fee is charged for the inspection request.
- Request the removal of their personal data from the register. The request for deletion must be made in writing to the controller's contact person.
- Limit the processing of personal data.

# 10. Consents and Prohibitions of Direct Marketing

The customer may give Kolster consent to direct marketing or based on the applicable law, prohibit the processing of personal data about them for direct marketing. Kolster uses personal data in direct marketing at its discretion only for such services that Kolster thinks are relevant to the registered person or the company it represents.

### 11. Changing the privacy statement

Kolster reserves the right to change this privacy statement.