

## SEWATEK OY PRIVACY NOTICE BUSINESS CUSTOMERS

Sewatek Oy respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we collect, process, and share your personal data when purchasing our products and services, visit our website, communicate, and interact with us, including on social media, or otherwise deal with us. The processing of personal data described in this Privacy Notice applies to the personal data of our business customer representatives.

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### 1. Who is data controller?

The data controller for the processing described in this notice is:

Sewatek Oy

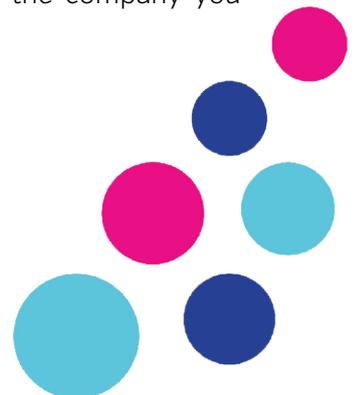
If you have questions regarding this Privacy Notice, please contact us by email at [\[tietosuoja@sewatek.com\]](mailto:tietosuoja@sewatek.com).

### 2. Data we collect and how we collect it

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 of this privacy notice, you will find a table which explains the purposes for the processing of personal data and the legal basis we rely on in such instances.

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

- A. **Identity data** means your name, date of birth, language preferences and the company you represent.
- B. **Contact data** means email, telephone, and address.



- C. **Transactions data** means information about the products and services you have purchased from us, as well as details of the agreements we have entered, payments we have made to you and payments you have made to you.
- D. **Profile data** means information about the services you use, and the training completed, your interests, preferences, the feedback you give and your answers provided to surveys, as well as your participation in competitions and your activity on our website. This can also mean information regarding the kind of contact work has been done with the company you represent, and the services provided.
- E. **Technical data** means your IP address, login data, browser type and 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 this website.
- F. **Usage data** means information that reflects your interaction with our website. The information collected may include, for example, the page from which the user has accessed the service, when and which pages the user has browsed, what has been clicked on and how we have responded to the letters we have sent.
- G. **Marketing and Communications Data** refers to your preferences for receiving marketing and newsletters from us and our partners as well as your communication preferences.

In general, the information is collected directly from you or when you are in contact with us, for example, through customer service or when you request marketing from us or use our services. We may collect and update personal data based on information received from the relevant authorities and companies providing related services.

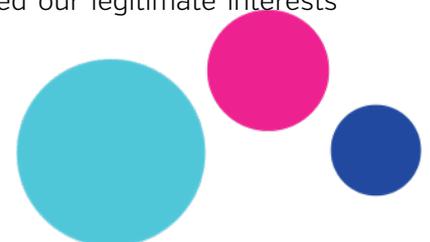
When you use our website or services, we may automatically collect Technical Data and Usage Data about the devices you use, your general browsing and browsing behavior for statistical monitoring of the number of visitors to the services and to measure the effectiveness of advertising. [We collect the mentioned information using cookies and other similar technologies.](#) We may also receive Technical Data about you if you visit other websites that use our cookies. We only use cookies if you have given your consent to their use unless they are technical cookies necessary for the functioning of the website.

### 3. Purposes and legal basis of personal data processing

We process your personal data only to the extent permitted by law. We process your personal data most often in the following situations:

- i. Where we need to perform a contract which we are about to enter into or have entered into with you cf. Article 6(1)(b) GDPR.
- ii. Where you have provided your consent cf. Article 6(1)(a) GDPR or Article 9(2)(a) GDPR.
- 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. Article 6(1)(f) GDPR.

In the table below we describe all the purposes for which we will use your personal data, and the legal basis on which we will process your personal data. We have also described our legitimate interests where the processing is based on this legal ground.



Purpose/Activity	Type of Data	Legal basis for processing including basis of legitimate interest
Customer service	(A) Identity Data (B) Contact Data	We have a legitimate interest in providing you with high-quality and efficient customer service and benefits.
To sign, manage and perform contracts with the contact persons of our business customers.	(A) Identity Data (B) Contact Data (C) Transactions Data	We have a legitimate interest in entering into contracts with the company you represent.
Analyzing and improving business processes and practices	(A) Identity Data (B) Contact Data	We have a legitimate interest in analyzing and developing our business.
Sending newsletters and other marketing and maintaining the marketing prohibition register	(A) Identity Data (B) Contact Data (D) Profile Data (G) Marketing and Communications Data	<p>We have a legitimate interest in sending you relevant marketing.</p> <p>We will send you marketing via e-mail or other relevant electronic communication channel, if you have given us your consent or we are otherwise entitled to so based on the Act on Electronic Communications Services.</p> <p>We maintain a register of persons who have opted out of marketing. The register is necessary to ensure that customers are not transferred back onto marketing lists.</p>
Providing the Website to the user	(E) Technical Data	We have a legitimate interest in providing you with access to our website.
Using data analytics to improve the website, products/services, marketing, customer relationships and experiences.	(C) Transactions Data (E) Technical Data (F) Usage Data	<p>We have a legitimate interest in developing our business and improving our marketing strategy.</p> <p>We only use non-necessary cookies if you have given your consent.</p>
Providing relevant and targeted marketing, advertising and website content on our and third-party sites and measuring the effectiveness of advertising.	(A) Identity Data (B) Contact Data (C) Transactions Data (D) Profile Data (E) Technical Data (F) Usage Data (G) Marketing and Communications Data	<p>We have a legitimate interest in deciding our marketing strategy and targeting our marketing to suit your preferences.</p> <p>We only use non-essential cookies if you have given your consent.</p>

To the extent that the processing of personal data is based on our legitimate interest, we have we conducted a balancing test. The purpose of the balancing test is to ensure that your interests and



fundamental rights do not override our legitimate interests. For more information regarding the balancing test, you can contact us by email at [tietosuoja@sewatek.com](mailto:tietosuoja@sewatek.com).

## 4. Sharing the data collected

We may disclose personal data to third parties in the following instances:

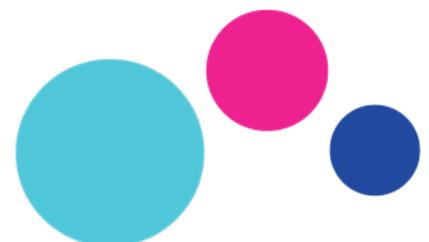
- When you pay on our website, the payment is managed by a payment service provider acting as an independent data controller.
- Where necessary for the purposes listed in Section three [3]. For example, we have outsourced our customer service to a third party, and we provide identification and contact information to the external service provider to develop direct marketing and improve targeting.
- Our website may set cookies and collect or transfer information to third parties. Please refer to the cookie notice and settings on our website for more information about these third parties and the purposes for which the information is collected. We only use non-essential cookies if you have given your consent.
- Your information may be shared with a person or entity that acquires all or most of our company, shares, or assets, or with whom we are in the process of merging.
- We may also collect your information when we believe in good faith that disclosure is necessary to exercise our rights or defend against a legal claim, to ensure your or others' safety, to investigate fraud, or to respond to a government request.

We share data, including personal data, with trusted third-party service providers. These service providers offer us services for the processing of personal data and process our personal data on our behalf and based on our instructions. Such services include, for example, system providers, customer care service providers, sales service providers, security service providers, debt collection agencies, postal services, marketing services, additional service providers and other similar partners. Third-party service providers may have access to or the ability to process personal data in order to provide the above services to us. Third parties may not use your information for purposes other than those related to the services they provide. We have entered into data processing agreements with the third parties in question. Your data will also be disclosed to public authorities or companies (e.g., the Post Office) for the purpose of updating and/or completing information.

## 5. Transfers to third countries

We do not currently transfer your data to countries outside the European Union or the European Economic Area. In the future, we will not transfer your data to countries outside the European Union or the European Economic Area unless we have verified that the transfer meets the requirements of Chapter V of the General Data Protection Regulation.

If you would like more information about the processors of your personal data established outside the European Economic Area and the security measures we have taken to ensure the continuity of data transfers, you can contact us by e-mail at [tietosuoja@sewatek.com](mailto:tietosuoja@sewatek.com).



## 6. Data retention

We will retain the personal data we collect for as long as we continue to have a legitimate interest in retaining it. When such legitimate interest ceases, we will delete or anonymize your personal data.

Data collected for marketing purposes will be removed from the register after the individual has withdrawn their consent. In case of an inactive email address on the marketing register, personal data will be stored for a maximum of one (1) year.

Personal data and contact information will be stored for as long as they are needed to communicate with a company representative. The data will be deleted, for example, when Sewatek becomes aware that the individual has changed jobs.

Transaction data will be retained to prove an existing contract and for accounting and taxation purposes for six (6) years from the end of the year in which the transaction was carried out.

Regarding customer feedback containing personal data, the data will be retained for as long as necessary for the purpose of which the data is used, i.e., to process the feedback provided by the customer. The feedback will be deleted once the necessary measures have been taken and the customer has been given a reasonable time to respond to any communication concerning him/her. The retention period for customer data is three (3) years.

Technical and usage data will be stored for three (3) years from the date of collection.

Data may also be retained for a longer period if we are under a legal obligation to retain the data or if retention is necessary to establish, present or defend a legal claim in legal proceedings.

## 7. How to exercise your data protection rights?

You have several different rights in relation to your personal data. Below you will find a summary of these rights and information on how you can exercise these rights and the limitations to which they may be subject.

Under certain circumstances, you have the following rights:

- **Right to request access to your personal data.** This right allows you to obtain a copy of the personal data we hold about you and to ensure that we are processing that data lawfully.
- **Right to request rectification of the personal data that we hold about you.** This right allows you to have any incomplete or inaccurate data we hold about you corrected. Please note that the law may prohibit that we delete entries in certain cases, for example medical records.
- **Right to request erasure of your personal data.** This right allows you to ask us to delete or remove personal data where there is no longer an appropriate basis for processing it.
- **Right to object to processing of your personal data** where we are relying on our legitimate interest (or that of a third party) as a legal basis for processing and you have a reason relating to a particular personal situation to object to the processing. You also always have the right to object to the processing of your data for direct marketing purposes.
- **Right to request the restriction of processing of your personal data.** This right allows you to ask us to suspend the processing your personal data, for example, for a period to verify the accuracy of the data or on the basis of processing.



- **Right to request that we transfer your personal data to another party** (also known as data portability).
- Where our processing is solely based on your specific consent, the **right to withdraw your consent** at any time. However, such withdrawal of consent will not affect the lawfulness of processing of personal data carried out based on consent before its withdrawal.

If you wish to exercise any of the data protection rights that are available to you, please send your request to us by email at [[tietosuoja@sewatek.com](mailto:tietosuoja@sewatek.com)]. Once you have contacted us, we will comply with 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 a complaint may be lodged with the Office of the Data Protection Ombudsman at <https://tietosuoja.fi/en/notification-to-the-data-protection-ombudsman>.

## 8. Changes to this privacy notice

This Privacy Notice may be updated as necessary 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 Notice, registered customers will be notified of the changes by email before they take effect.

