

PRIVACY STATEMENT

This Privacy Statement on the processing and protection of personal data by Den Group Ltd companies (hereinafter referred to as “Den”) describes our commitment to respecting and protecting the privacy of our customers. We understand that privacy protection is important to our customers.

In this Privacy Statement, we

- explain how we collect, use and protect your personal data,
- demonstrate how we protect and respect your privacy, and
- help you understand how your personal data is collected and used and what rights you have.

YOU CONFIRM THAT YOU ARE AWARE THAT DEN MAY OCCASIONALLY, WITHOUT ADVANCE NOTICE AND AT ITS SOLE DISCRETION, CHANGE, EDIT, SUPPLEMENT, ABRIDGE OR OTHERWISE UPDATE THIS PRIVACY STATEMENT.

We process your personal data according to Finnish law and official regulations and instructions.

The Privacy Statement applies when you use our products and services or visit our website. The Privacy Statement does not apply to the services or websites of other companies even if access to such services is through Den’s network or services.

DEFINITIONS

The Privacy Statement uses the following specific terms:

Customer is someone who registers on our website and orders, buys or uses our products and services.

Personal data refers to data that can be directly or indirectly connected to you as a person. The types of personal data that we process are described later in the Privacy Statement.

Services refers to all the products and services offered by Den.

Traffic data refers to data that is processed to transfer messages or information. Data generated while using the Services includes communications start and end time, information on the parties to the communications and terminal devices, duration and message routing, terminal device location or location data, or other similar data processed online to transfer, share or transmit information.

How do we collect your personal data?

The personal data we collect depends on the Services you use, subscribe to or buy and the information you submit to us in that context or otherwise when you login to a Service we provide. It is not mandatory to disclose personal data to Den, but if you decide not to disclose your personal data, we may not be able to provide our Services to you.

We collect personal data that:

You provide when you, for example, buy or rent our Services or login to our Services, order catalogues, enter contests, subscribe to our newsletter or contact us.

Is generated when you use the Service, within the legal limits, when you, for example, use our website or other Services, such as making a telephone call or sending an e-mail.

We receive from other sources, such as other service providers or publicly available registers, for example, the Population Register Centre, Posti registers or customer marketing registers.

WHAT PERSONAL DATA DO WE COLLECT ABOUT YOU?

We collect the following types of personal data:

- Basic information, such as name and contact information, family relations and spouse, and spouse's contact information.
- Demographic data, such as birth date, profession and native language.
- Form of housing and special characteristics of housing.
- Information connected to the customer relationship, such as information on the Service, products and orders, invoicing, credit and payment information, marketing consent or ban, customer contacts and associated recordings, such as contacts to sales, customer service and/or production.
- Data generated when you use communications services and other Services, such as the traffic data of telephone calls and e-mails, information on the parties to the communications, contact time, location data and data on the terminal device.
- Other information illustrating use of the Service, such as data collected through cookies and similar technologies during Internet and mobile browsing and use of a mobile application.
- Data connected to the identification and registration of the customer and user, such as usernames and passwords needed for the administration of the Mobile Certificate.
- Other information collected with your consent, to be specified in more detail when your consent is requested.

HOW DO WE USE YOUR PERSONAL DATA?

Den collects, processes and uses personal data that is needed to carry on our business, for customer service and for relevant commercial activities.

The processing of personal data is usually based on an agreement signed with us or on Den's legitimate interest in the context of the use and provision of Services. We can also process personal data on other grounds, such as based on consent or law.

Den Finland processes your personal data for the following purposes:

Service production: We process personal data in order to provide and produce the Services. The provision of the Services requires that we process personal data for the identification of customers or users, processing and delivery of orders, invoicing, credit control, recovery, customer service and processing of complaints. We also process personal data for customer communications, such as sending notifications connected to the Services and contacting customers in matters connected to our Services.

Sales and marketing: We process and utilise personal data for marketing purposes and to form marketing target groups within the limits of current legislation. We may process personal data for personalisation and targeting, such as making recommendations and showing targeted contents in the Services or our channels (web, social media). Within the legal limits, we may use personal data to market our products and those of our partners, including direct marketing, market research and customer satisfaction surveys.

Development and analysis: We process personal data internally for the development and management of our business operations, Services and the associated processes. We also process personal data in order to gain a better understanding of the needs of our customers. We may create statistics for development of the Services or other analysis purposes. We may group our customers based on invoicing, usage quantities, length of the customer relationship and external classifications, for example, to examine the ways in which different user groups use the service or how a person's domicile and age affect their use of the Services.

Data security and abuse of the Services: We may process personal and traffic data to ensure the data security of all of our Services and communications networks. If necessary, we may also process personal data in order to detect or prevent abuse of our Services or fraud.

Compliance with statutory obligations: In order to fulfil our statutory obligations, we process personal data, for example, for accounting and regulatory purposes.



Other purposes to which you have consented: We may process your personal data for all purposes to which you have consented.

In all of the situations listed above, we process personal and traffic data only to the extent required for the purpose of the processing and always consider the privacy protection of our customers.

Den only processes your personal data for the specified purpose. We may combine data collected in the context of different Services in so far as the data was collected for the same intended purpose. We never process personal data in a way that is incompatible with the specified purpose.

HOW DO WE PROTECT YOUR PERSONAL DATA?

We ensure the safety of data, information systems and staff as well as offices and technical premises. We continuously work to protect the personal data and rights of our customers.

In the protection of data, we consider the privacy risks and business risks connected to the processing of personal data, the available technological opportunities and the various threats in accordance with the applicable law, regulations and contractual obligations.

Data security and the protection of customer data are of utmost importance to us. We strive to follow appropriate procedures in order to protect personal data and to prevent and detect any outside access to personal data.

WHO DO WE DISCLOSE YOUR PERSONAL DATA TO?

We may disclose your personal data to:

Companies in the same Group to the extent allowed by the applicable law. Companies in our group may use your personal data for the purposes specified in this statement, including the marketing of their products or services to you.

Subcontractors acting on behalf of Den that process personal data on our behalf based on our commission. Such third parties are not permitted to use the personal data for any other purpose than to produce the service agreed on with Den. When we use subcontractors, we properly ensure that the processing takes place in compliance with the Privacy Statement.

Partners that process personal data on our behalf may be located outside Finland, the European Union or the European Economic Area. In such cases, we also ensure, as the law requires, that your personal data stays protected.

Other service providers that provide or have committed to providing you with services, such as invoicing.

Other third parties with your consent, which may have been received in the context of a specific service, for example.

We may also disclose your data:

In the context of court proceedings or at the request of an authority, based on the applicable law or a court order or in the context of an official process. Personal data may be disclosed based on a court order, for example, to a copyright holder or their representative.

We may also disclose data to a competent authority, such as the police or emergency response centre authorities, to the extent required by law and according to a procedure determined in advance.

In situations required or permitted by law, such as delivering a detailed itemisation of an invoice to a customer.

In corporate transactions, such as during mergers and various business acquisitions or transfers.



We may also process statistical data that cannot be connected to you individually. We may disclose such data to third parties for purposes other than those described in the Privacy Statement.

HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We keep your personal data for as long as necessary for the purposes specified in the Privacy Statement, unless required otherwise by law.

We do not keep outdated or unnecessary data. We strive to ensure that personal data and other customer information is up-to-date and accurate.

HOW DO WE USE COOKIES?

Our websites may use cookies. Cookies allow us to ascertain the most popular sections of our websites, the pages users visit and the duration of their visit. The collected data is used, for example, to provide the Services, develop and analyse them, and to target marketing in the services or information networks provided by Den or its partners.

You can block cookies from being stored on your computer by changing the browser settings. In some cases, this may make it slower to browse our website or even block access to a specific page.

We typically use the data collected using cookies for the following purposes:

Functional cookies and production of the Services: Cookies are important for the functioning of our website and electronic Services, and they enable a smooth user experience.

Development of the Services: By monitoring the use of cookies, we can improve the functioning of our website and electronic Services. For example, we receive information about the most popular sections of the website, where the users go to or the website from which they come to ours, and the duration of their visit to our website.

Analysis: We use cookies for the statistical monitoring of the user numbers of websites and electronic Services and for the calculation of advertising effectiveness. We may collect data on, for example, marketing e-mails and newsletters in order to determine whether the messages were opened and whether they led to any actions, such as a transfer to our website.

Targeted marketing: We may also use cookies in order to produce advertisements or contents targeted for a specific browser by creating various target groups.

We may connect data obtained about a user through cookies to other data obtained in any other contexts, such as information on the services used, to the extent allowed by law.

Den's website may contain links and connections to third-party websites, products and services as well as third-party social plugins, such as a Facebook Like button. Such third-party services and applications on Den's website are subject to the third party's privacy statement. We recommend that you familiarise yourself with the relevant third party's privacy policy.

WHAT ARE YOUR RIGHTS AND CHOICES?

You have the right to:

- Request that inaccurate, unnecessary, incomplete or outdated personal data be rectified or deleted.
- Restrict the processing of your personal data unless the legal business purposes and compliance with law described in this Privacy Statement in probability require such processing.
- Check whether we process data about you and which data we process according to valid law. The request to access data must be made to Den through a personally signed or similarly verified document or in person.
- Restrict the publication of personal data and contact information and their disclosure to contact information services.



INFORMATION FOR DATA SUBJECTS

- Restrict the use of your personal data for direct marketing surveys and opinion polls.
- Revoke your consent. In that case, we may not be able to provide our Services to you.

If you feel that Den has violated the Privacy Statement or valid law, you have the right to submit a complaint.

ENQUIRIES REGARDING THE PROCESSING OF PERSONAL DATA AND REQUESTS TO ACCESS DATA

The data controllers include all companies in Den Group Ltd:

Den Finland Ltd, Business ID: 2347517-2
Finnlamelli Oy, Business ID: 2361049-3
PT PohjanTeko Oy, Business ID: 2602653-2
PohjanGeo Oy, Business ID: 2708923-6

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