

## 1. Controller

ETS NORD AS, Finnish branch (Business ID: 2239911-2)  
(hereinafter referred to as the “Controller”)

## 2. Contact details

By post or email to:

ETS NORD Finland  
Pakkasraitti 4,  
04360 Tuusula  
info@etsnord.fi

Please specify “privacy issues” in the message header. Processing of your case by our designated liaison person will begin when you contact the Controller.

## 3. Purpose and basis of processing personal data

Processing of personal data of a data subject (“Data Subject”) is principally based on a stakeholder, customer or co-operation relationship, and thus in particular on some agreement between the parties, statutory duty or legitimate interest.

The business operations of the Controller include selling, installing and maintaining various technical appliances for ventilation. The Controller accordingly collects and processes personal data in order to implement contracts or to perform pre-contractual measures related to these operations. Personal data are also processed for communications related to relationships with stakeholders, customers and partners.

The Controller may also have a statutory duty to process personal data, for example based on the applicable accounting acts, company law, tort obligations and tax regulations. We may record a personal identification number on request from a contractual partner under the applicable data protection acts.

Subject to statutory limitations, the Controller, any joint controller or contractual partner, and a company belonging to the same group may be entitled to use personal data for such purposes as conducting opinion or customer satisfaction surveys, or in other equivalent addressed dispatches, such as direct marketing, for example based on a legitimate interest. The Data Subject shall be entitled to prohibit personal direct marketing. Regardless of any such prohibition, details concerning a customer account may be sent to the Data Subject where this is essential in order to perform a service or comply with a statutory duty.

## 4. Personal data processed

We collect and process the following personal data:

- Forename and surname
- Enterprise, corporation, government agency, job title
- Contact details: address, domicile, email address and telephone number
- Workplace contact details
- Details of delivery address for orders/installations
- Personal identity number under limited circumstances
- Age and language
- Details of any business prohibitions, debt adjustments and subjection to international sanctions, and details required under the applicable legislation on detecting and preventing money laundering and terrorist financing
- Details of mode of payment and invoicing
- Communication, feedback and notices of defect exchanged between the parties
- Any other details concerning management of the customer account, co-operation or case processing
- Any possible marketing authorisations and prohibitions

## 5. Sources of personal data

Personal data are generally collected from the Data Subjects (for example in the context of co-operation, legal transactions including measures under company law, meetings between parties and other contact). Information may also be received in the form of personal data that are essential for supplying the services specified in co-operation agreements from partners, public authorities, public sources and registers, employers, colleagues or individuals in person, and from information services to the extent permitted by law.

## 6. Personal data disclosures, transfers, recipients and associated processing practices

Personal data may be transferred or disclosed to third parties such as public authorities to the extent permitted and required under current legislation.

Enterprises belonging to the same group as the Controller may process personal data in accordance with the data protection legislation that is valid and applicable at time to time. We may have concluded contracts with selected partners that include processing personal data on the Controller's behalf. Personal data may thereby be transferred to subcontractors, such as accounting firms and suppliers of payment and other services (e.g. IT system service providers), which process personal data on the Controller's behalf, subject to a duty of confidentiality and to mandatory data protection legislation and agreements.

Our website may also use cookies. The information collected using cookies helps to improve site functionality and gather general visitor data (such as Analytics services). Users are free to disable the cookie function by adjusting their browser settings. Information platforms will not necessarily function faultlessly after disabling cookies, as some cookies may be required for certain services to function properly.

The Controller uses external cloud-based systems for its email messaging and website platform where personal data are stored. Personal data are also stored in the cloud services of other external service providers. Personal data may then be transferred to servers outside of Europe with service providers in the US Privacy Shield system, which is considered to satisfy the minimum requirements of European Union data protection regulations, with the transfer implemented via data transfer mechanisms approved by the European Commission, including its standard contractual clauses.

We may disclose personal data to a third party involved in any merger, business acquisition or other enterprise sale to which the Controller is a party. We shall nevertheless ensure that all personal data remain confidential in such cases.

No automated decision-making is based on personal data.

## 7. Personal data retention period

Personal data will generally be processed for the duration of a customer account or co-operation, and for a reasonable period thereafter or in accordance with associated statutory provisions, such as processing of bookkeeping information for the period prescribed in accounting provisions. Information gathered by agreement may generally be retained for ten (10) years reckoned from end of the contractual relationship and performance of associated obligations.

## 8. Data security

We apply administrative, organizational, technical and physical safeguards to protect the personal data that we gather and process. The measures that we employ include data encryption, firewalls, secure spaces, and systems protected by restricting personal access to the scope of duties performed by designated staff. Our security measures are designed to maintain an appropriate standard of data confidentiality, integrity, availability, fault tolerance, and retrieval capacity.

If, notwithstanding security measures, some security breach occurs that is likely to have a detrimental effect on a person's privacy, then we shall notify all affected parties of the breach as required by the applicable legislation, and public authorities at the earliest opportunity where applicable data protection legislation so requires.

## 9. Rights of the data subject

The rights of a data subject are based on the General Data Protection Regulation (EU) 2016/679, which include a right of inspection and the right to have information corrected or deleted in certain circumstances. The Data Subject may exercise such rights under the circumstances specified in legislation. The full exercise of rights may be subject to restrictions.

Claims concerning the rights of a Data Subject must be submitted to the Controller's liaison person in writing. Situations concerning the exercise of rights will be evaluated individually, with a separate decision always issued in each case. The response to a request to exercise the rights of a Data Subject shall generally be issued within one (1) month of receiving the request. The request shall be free of charge. The Data Subject may be charged a reasonable fee or the request may be declined if the request is manifestly unfounded or unreasonable, and particularly if it is submitted repeatedly. A Data Subject shall be entitled to submit a request only with respect to information concerning the said Data Subject.

### Further details of rights:

#### *Right of access to one's own information*

A Data Subject shall be entitled to request access to information concerning the said Data Subject (hereinafter referred to as the right of inspection) in order to determine whether such information is processed or not processed in a register of members. The rights of the Data Subject to obtain information may be restricted or refused under legislation if the disclosure of information would compromise the rights and liberties of others. Such protected rights include the Controller's trade secrets or the personal data of another person.

#### *Right to correct and delete information*

A Data Subject shall be accordingly entitled to require the Controller to correct inaccurate and incorrect personal data without undue delay. The Controller shall delete personal data concerning a Data Subject at the latter's request unless such deletion is unnecessary, for example if processing is required in order to comply with a statutory duty of the Controller, or in order to prepare, assert or defend a legal claim.

#### *Right to object to or request restriction of data processing*

A Data Subject shall be entitled to object to processing of personal data on grounds related to his or her special personal circumstances when the data are processed on the basis of a legitimate interest. The Data Subject shall not be entitled to object to processing of personal data that is based on an agreement between the Controller and the Data Subject. A Data Subject who has objected to processing of personal data on grounds related to his or her special personal circumstances shall specify the said circumstances. The Controller may continue processing data notwithstanding an objection if there is some considerably important and substantiated reason for processing that overrides the interests, rights and liberties of the Data Subject, or if continuing is necessary in order to prepare, assert or defend a legal claim. The Data Subject shall, at any time, be entitled to object to the use of personal data concerning him or her in direct marketing. Personal data may no longer be processed for direct marketing if the Data Subject objects to such use.

The Controller shall restrict active processing of personal data at the Data Subject's request, for example if the Data Subject contests the accuracy of the personal data, in which case processing shall be restricted until such time as the Controller can verify the accuracy of the data. Data may generally only be stored during a restriction of processing. Data may also be processed in order to prepare, assert or defend a legal claim, to protect the rights of another natural person or legal entity, or for reasons related to an important public interest. The Data Subject must be notified before the restriction of processing is lifted.

#### *Right to transfer information between systems*

Insofar as a Data Subject has personally supplied personal data that are processed automatically and pursuant to an agreement between the Controller and the Data Subject, the Data Subject shall generally be entitled to obtain such data in a machine-readable form and to have the personal data transferred directly from the Controller to another party if this is technically possible.

**10. Requests related to the exercise of a Data Subject's rights**

A Data Subject may contact the Controller in questions related to processing of personal data and in circumstances related to the exercise of the said Data Subject's rights.

A request to the Controller concerning the right of inspection or the exercise of some other rights of a Data Subject shall be submitted in writing, either by email or by post using the contact details specified in section 2. The Controller may ask the Data Subject for adequate clarification of the data or processing measures to which the Data Subject's request relates.

The Controller may ask the Data Subject to provide a signed inspection request where necessary in order to ensure that personal data are not disclosed to anyone other than the Data Subject in person in the course of exercising the rights of the Data Subject. The Controller may also ask the requesting party to provide proof of identity using an official identity document or in some other reliable manner.

**11. Right of appeal to a supervisory authority**

The Data Subject shall be entitled to appeal to the competent supervisory authority on considering that he or she has been unable to settle a matter by contacting the Controller. Efforts shall nevertheless be made to resolve the matter by discussion between the parties in the first instance.

The Data Protection Ombudsman serves as the local supervisory authority in Finland. Further details are available online at <http://www.tietosuoja.fi/en>.

**12. Documents supplementing the general privacy statement**

The Controller may hold document(s) that supplement this privacy statement. These include a special personal data processing statement concerning recruiting provided to job applicants in the manner described in these possible separate recruitment notice(s) and documents.

*We may modify and update this general privacy statement and its supplementary documents as necessary. Please review our code of data protection processing practice regularly.*

*Statement dated 4.1.2021*