

## **DATA PROTECTION NOTICE**

### **The controller**

Emittor Oy ("Emittor")  
Business ID: 2769988-6  
Email: dataprotection@emittor.com  
Phone number: +358 20 730 7420  
Registry name: Customer Registry

### **Purpose of processing personal data**

The processing of personal data is based on the statutory obligations of Emittor and the provision and implementation of the services under the customer agreement between the customer and Emittor.

Personal information is used for the following purposes:

- Identifying and knowing a customer
- Concluding and managing customer agreements
- Opening and managing customer services
- Managing a customer relationship
- Communication between a customer and Emittor
- Communication between Emittor's customers
- Carrying out legal and regulatory obligations

### **Data subjects**

Persons who have or have had an interest or obligation in the customer relationship between Emittor and its customer, such as the right to act on behalf of the customer.

### **Data content of the register**

Information identifying the data subject such as:

- Name
- Nationality / nationalities
- Social Security number or date of birth

The data subject's contact information such as:

- Telephone
- Email address

The data subject's usage data of the services such as:

- User Roles in the web service provided by Emittor ("Web Service")
- Actions taken on the Web Service, including order details

- Time of activation and termination of the data subject's user rights in the Web Service
- Records of calls and electronic communications
- Information required to comply with statutory regulations.

### **Regular sources of information**

The data content of the register is obtained from the data subject, from public sources or from another person authorized on behalf of the customer for the purpose of customer relationship. Data is generated in connection with the services used by the customer.

In some cases Emittor also collects and processes personal data about persons associated with the data subject, for example employees, beneficial owners, guarantors, persons who are in contact with Emittor, and other individuals with whom Emittor interacts and collaborates with.

### **Regular disclosures and transfers of data**

Those responsible for maintaining the Web Service will have access to the registered data. These entities are bound by the same secrecy and other obligations regarding the data and its handling as Emittor.

Information will be disclosed to authorities or other entities as required by statutory regulations.

Data will not be transferred outside the EU or the EEA except as required by statutory regulations.

### **Principles of register security**

Access to the register is limited by access rights. All data subjects processing the data are bound by statutory secrecy obligation and/or non-disclosure agreement.

Personal data will be kept confidential, mainly in electronic format. Data in electronic format is stored on secure servers.

The material may be temporarily in physical format. The data on the paper is stored in a locked location that is accessible only to authorized employees.

Emittor will keep the data for as long as they are needed for the purposes for which the data was collected and processed or required by laws and regulations. For instance, in accordance with the Act on Preventing Money Laundering and Terrorist Financing, all documents and data concerning customer due diligence and customer transactions data shall be retained in a reliable manner for a period of five years after the end of the permanent customer relationship.

### **Rights of the data subject**

The data subject has the right to access and verify the data entered in the register concerning her/him. The data subject is entitled to have the data rectified, with the restrictions that follow from legislation. The data subject may also verify and partially rectify her/his own data through the Web Service.

The data subject can object to the processing of her/his personal data, with the restrictions that follow from legislation. The data subject can always object to the processing of her/his personal data for the purposes of direct marketing and profiling in connection to such marketing.

The data subject may request Emitter, with the restrictions that follow from legislation, to restrict the processing of these data, if the data subject contests lawfulness of processing or the correctness of the data which Emitter has registered about the data subject.

The data subject has the right, with the restrictions that follow from legislation, to request erasure of the personal data in case processing is unlawful or the data subject objects to processing for direct marketing or the data subject objects to the processing and there is no justified reason for continuing the processing.

Emitter does not make substantial decisions regarding the data subject based on automatic data processing and profiling without the data subject's express consent, the applicable legislation's permission, or when automatic decision-making is essential for concluding or executing an agreement. The existence of automatic decision-making is notified in connection with the service, and complaints about decisions can always be made to Emitter.

The above-mentioned requests must be addressed in writing to Emitter Oy, Eteläesplanadi 2, 00130 Helsinki. The data subject is identified before the right is used.

The Data Protection Authority controls, monitors and provides advice on the processing of personal data. Data Protection Officer's office, P.O. Box 800, 00521 Helsinki.

### **Changes to this data protection notice**

Emitter is constantly improving and developing services, products, and websites, so Emitter may change this Data protection notice from time to time. If the changes are significant, Emitter will provide you with a notice, when required to do so by applicable law.

23 February 2023