

## Mäkelä Alu Oy – Privacy Policy

Updated on May 24, 2018

Mäkelä Alu Oy (hereinafter "Mäkelä Alu Oy" or "we") is committed to ensuring the confidentiality and safety of personal data and processing personal data in accordance with the existing laws and regulations on data protection and privacy. As an organization, Mäkelä Alu Oy complies with procedures and processes that ensure the legitimate processing of personal data, transparent informing and data protection, and the proper level of data security.

This Privacy Policy explains how we process personal data in our organization. In this Privacy Policy, we explain the type of personal data we process, our purposes for collecting and processing personal data, and when personal data is disclosed. We will also outline the rights of the Data Subject. Personal data may be collected from Mäkelä Alu Oy's customers, customer representatives, end customers, potential customers, business partners and other stakeholders, individual website visitors and employees (hereinafter "Data Subject" or "you").

Mäkelä Alu Oy is responsible for processing personal data in accordance with this Privacy Policy and the applicable data protection legislation. We may modify or update Our Privacy Policy when necessary. Mäkelä Alu Oy's valid Privacy Policy is available on Mäkelä Alu Oy's website, at https://www.makelaalu.fi/tietosuoja.

## 1. Register Controller

Mäkelä Alu Oy Mäkeläntie 2 62830 Luoma-aho, Finland Tel. +358 (0)6 557 7600 E-mail (general) <u>posti@makelaalu.fi</u> E-mail (data protection) <u>tietosuoja@makelaalu.fi</u>

The data protection secretary will be responsible for answering any questions you may have about data protection and the rights of the Data Subject (e-mail: tietosuoja@makelaalu.fi).



## 2. Purpose of Data Processing

Mäkelä Alu Oy processes personal data for various purposes described below.

## 2.1 Products and services

We process personal data mainly to provide you with our products and services, and to offer and maintain our e-services.

The processing of personal data is primarily based on a contract concluded with the Data Subject, including the necessary processing of personal data prior to establishing a customer relationship.

## 2.2 Marketing and communication

Personal data is used for customer communication management and marketing purposes. The processing of personal data is based on Mäkelä Alu Oy's legitimate interest to provide you with relevant and updated information. Mäkelä Alu Oy also has a legitimate interest to provide information on its latest products and services to relevant target groups.

Digital marketing is based on your prior consent or Mäkelä Alu Oy's legitimate interest to offer products and services based on your profession or position. The rights of the Data Subject are outlined under point 6.

## 2.3 Products and service development

Mäkelä Alu Oy constantly develops and improves new products and services, and informs you about them. We may use personal data to analyze market trends, Data Subject groups and the use of our website and service in order to develop and improve the quality of our website, services, and products. Such processing is based on Mäkelä Alu Oy's legitimate interest to grow and develop.

We may use cookies and similar technologies for statistical purposes, for example, to create anonymous, aggregated statistics about the users of our website and services to make our website and services more user-friendly.



## 2.4 Data security

Mäkelä Alu Oy may process technical information, including certain personal information, to improve data security and prevent security risks. We maintain and monitor data security to secure the company's information and funds, protect personal data and prevent criminal activities, and to ensure the proper functioning of our websites and services. Such processing is based on Mäkelä Alu Oy's legitimate interest to ensure proper network access and data security.

## 2.5 Personal data processing within the organization

Personal data may be processed in all Mäkelä Alu Oy companies. Such processing is based on Mäkelä Alu Oy's legitimate interest to establish and manage customer relationships, marketing and internal data security measures in a proper and effective manner.

# 3. Data Collection

## 3.1 Customer relations

Mäkelä Alu Oy processes personal data to maintain customer relationships, for example, when providing and delivering products and services, and to communicate with customers. In this case, personal data will be collected directly from the Data Subject.

Depending on user interaction, Mäkelä Alu Oy may collect the following personal data:

- Basic information about you, such as name, e-mail address, telephone and mobile phone number, and other contact details.
- Details of your employer, such as company name, address, e-mail address, telephone numbers, and other contact details.
- Payment details regarding subscription and delivery.
- Information concerning the customer relationship, such as product and service orders and deliveries, the start and end date of the customer relationship, and list segmentation information.
- Billing information, such as account numbers, payments (made and due) and sent invoices.
- Customer communication



## 3.2 User interaction

Mäkelä Alu Oy may collect personal data when the Data Subject contacts our customer service, leaves a contact request on our website or contacts us in some other way, subscribes to our newsletter, or takes part in surveys or competitions on our website or elsewhere. In this case, personal data will be collected directly from the Data Subject.

Mäkelä Alu Oy may collect personal data which you have provided, including the following:

- Basic information about you, such as name, e-mail address, telephone and mobile phone number, and other contact details.
- Details of your employer, such as company name, address, e-mail address, telephone numbers, and other contact details.
- Purpose of contact and related information.
- Surveys and competitions in which you have participated.

## 3.3 Automatically collected data

With certain services and websites, Mäkelä Alu may automatically collect and process the following technical information about users as well as the use of Mäkelä Alu Oy's services and products:

- IP address, device ID, device type, operating system and application settings.
- User activity, such as websites visited and products viewed or clicked on.
- Time spent on our services, and registration and identification information.
- Location / country of origin.

Where necessary, such technical information is automatically collected when you useour website or services.

#### 3.4 Information from other sources

Mäkelä Alu Oy may also from time to time collect information from publicly available sources and third parties, such as the social media or marketing companies.



## 4. Sharing of Personal Data

Mäkelä Alu Oy may disclose personal data to the following third parties:

- Mäkelä Alu Oy companies for the above-mentioned purposes.
- Trusted service providers and outsourcing partners, such as distributors and marketing service providers, for the above-mentioned purposes. However, trusted service providers and outsourcing partners always operate on our behalf. Mäkelä Alu Oy is therefore responsible for ensuring the appropriate use of personal data in such entities.
- Where law so permits or requires (e.g. when presented with a subpoena or other legally binding requirement).
- If Mäkelä Alu Oy becomes subject to a merger, corporate acquisition or business acquisition (full or partial).
- If Mäkelä Alu Oy sincerely believes that disclosing the information is necessary to secure Mäkelä Alu Oy's rights and the safety of others, detect fraud, or meet regulatory requirements.

# 5. Transfer of personal data Outside the EU/EEA

## 5.1 Service providers outside the EU/EEA

Mäkelä Alu Oy may use subcontractors to provide our services. Where appropriate, and as far as necessary in terms of service provision, personal data may be transferred outside the EU/EEA. In this case, Mäkelä Alu Oy uses established mechanisms (such as the standard contractual clauses approved by the European Commission) that enable the transfer of data to third country subcontractors.

Mäkelä Alu Oy insists on a Privacy Shield certification when cooperating with service providers that operate in the United States. More information on the Privacy Shield framework (developed by the United States Department of Commerce and the EU Commission) and relevant principles regarding the processing of personal data is available at https://www.privacyshield.gov.



# 6. Marketing

When you provide your contact details to Mäkelä Alu Oy, for example, when you purchase a product a service, contact our customer service, order a manual or other materials or participate in a competition on our website, Mäkelä Alu Oy may use your personal data to marketing purposes, to present products and services, and to provide you with a more personal user experience.

You will be given the opportunity to give your consent to us using the data for such purposes or, if applicable law permits, to opt-out from receiving marketing messages from Mäkelä Alu Oy.

## 6.1 Digital marketing

Mäkelä Alu Oy may send the customer or potential customer information about product and service updates, newsletters, and other marketing material on existing and new products and services via e-mail or text message (SMS), if the user has given their consent in advance or if applicable law so permits.

You may at any time opt-out from receiving marketing messages by clicking on the 'unsubscribe' link in the emails Mäkelä Alu Oy sends you.

## 6.2 Statistics and analyses

Mäkelä Alu Oy may create group profiles or segment users for the purpose of creating anonymous, aggregated statistics about the use of our website, products and services (e.g. number of visitors on our website or opened e-mails) in order to identify features that could be improved and to provide context based advertising to certain groups. Data collected for these purposes is not used to identify a particular individual but to analyze how individuals in general or how certain groups use the website or services.



## 6.3 Targeted advertising

We or our advertising partners may display content or advertisements to a website visitor. For example, a visitor may see a Mäkelä Alu Oy advertisement (a recently viewed product on our website) on an advertising partner's website. We may use cookies and other similar technologies to display personalized adverts based on, for example, your browsing or log-in information.

When Mäkelä Alu Oy collects or uses your browsing information for digital marketing purposes, you may at any time object to such processing by contacting Mäkelä Alu Oy's customer service or sending an e-mail to tietosuoja@makelaalu.fi. More information on your right to object is found under point 8.

# 7. Retention of Personal Data

We will retain your personal data for as long as reasonably necessary for the purposes outlined in this Privacy Policy and in accordance with our legal obligations. When your personal data is no longer required by law or rights or obligations by either party, we will delete your personal data.

With personal data retention, we comply with the following main rules:

- The personal data of customers, business partners and other stakeholders will be retained for the duration of the customer relationship or cooperation, or as long as required by law or rights or obligations by either party, for example, to process an invoice or complaint.
- Data collected from interaction with our customer service or other communication with Mäkelä Alu Oy as well as surveys and competitions will be retained as long as necessary to fulfil the purpose(s) for which it was collected.
- We will delete the personal data of unhired applicants when such data is no longer required by law or rights or obligations by either party.
- We will delete or anonymize information collected for marketing purposes after a reasonable amount of time after the last contact between the Data Subject and Mäkelä Alu Oy, unless such information is required by law or rights or obligations by either party.
- If the period for retaining personal data is governed by a law or regulation or regulatory requirements on data processing and retention, we will retain your personal data at least for the period required.



# 8. Rights of the data subject

You have the right to review your personal data held by Mäkelä Alu Oy.

You have the right to modify, rectify and delete your personal data. However, certain information is strictly necessary in order to fulfil the purposes outlined in this policy and may also be required by law. Thus, deleting such personal data may not be permitted by applicable data retention laws.

. You have the right to restrict the processing of your personal data in certain specific circumstances set out in the applicable data protection legislation.

You have the right to data portability, in other words, the right to receive the personal data related to you in a structured, commonly used and machine-readable format and the right to transmit the data to another controller, to the extent required by applicable law, if it is reasonably practicable to do so. This applies to personal data based on consent or agreement, and applies only to such personal data you have provided to us yourself.

You may exercise your right by contacting Mäkelä Alu Oy's data protection secretary (email <u>tietosuoja@makelaalu.fi</u>). The data protection secretary's task is to give you information on how to exercise your rights and advise you on other Mäkelä Alu Oy's data protection matters.

In case you feel that we have processed your personal data contrary to this Privacy Policy or the applicable law, you have the right to lodge a complaint with the relevant national supervisory authority in the EU/EEA. Mäkelä Alu Oy is under the supervision of the Finnish Supervisory Authority.



# 9. Data security

Mäkelä Alu Oy maintains appropriate physical and technical security measures and procedures to protect personal data against accidental or unlawful destruction or loss, alteration, unauthorized disclosure or access. Mäkelä Alu Oy limits access to this data to authorized employees and subcontractors who need the information to do their jobs as well as third-party service providers who will process the data in accordance with the instruction provided by Mäkelä Alu Oy. We ensure that persons authorized to process the personal data have committed themselves to confidentiality.

Although we implement appropriate security measures, no security system can prevent all potential security breaches. However, we are committed to continuously develop our data security and we react to detected threats according to the assessment of the risks.

# 10. Contact information

In data protection related matters, please contact your designated customer contact or call our customer service at +358 6 5577 600 (office hours 8-16) where your call will be directed to the appropriate person.

You can also directly contact our data protection secretary who coordinates and supervises data protection practices in our organization, preferably by e-mail (<u>tietosuoja@makelaalu.fi</u>) or, if necessary, by phone (+358 50 3200 137) during office hours (8-16).

We update our Privacy Policy when necessary, and the updated version is always available at https://www.makelaalu.fi/en/privacypolicy.