

## PRIVACY POLICY FOR CUSTOMER REGISTER

The purpose of this Privacy Policy is to inform Renor Oy's clients/tenants, potential clients, contract and co-operation partners (hereinafter also "the data subject") how we process their personal data.

We take seriously our compliance with the EU General Data Protection Regulation as well as other applicable personal data processing legislation when processing personal data. We also ensure that processing is secure and that our data protection practices allow for the full exercise of data subjects' rights.

Should there be any changes to the data processing policies of Renor Oy or to relevant legislation, this privacy policy may be updated. For our privacy policy valid at each time, please visit our website at [www.renor.fi](http://www.renor.fi).

### CONTROLLER

Renor Oy (business ID 2343526-9)

Any communication related to data protection should be addressed to Renor Oy / Data Protection, Askonkatu 9 B, 15100 Lahti, Finland or by e-mail to [legal@renor.fi](mailto:legal@renor.fi) with the header "Matters concerning data protection".

### NAME OF DATA FILE

Client, contract, co-operation partner and marketing data file ("Asiakas-, sopimus- ja yhteistyökumppani- ja markkinointirekisteri")

### THE PERSONAL DATA PROCESSED, THE PURPOSES OF THE PROCESSING AND THE LEGAL BASIS FOR THE PROCESSING

Personal data	Purpose of processing	Legal basis	
<b>Basic and contact information</b> such as name, email address, phone number, address details, vehicle registration number	Delivering and developing our services	Our legitimate interest in developing our business	
	Customer surveys		
<b>Information about the company and its contact persons</b> , such as the business ID and the names, titles and contact details of the contact persons.	Fulfilling our contractual and other undertakings and obligations	Fulfillment of the agreement	
	Billing		
	Marketing our services to businesses		Our legitimate interest to market our activities
	Bookkeeping		Legal obligation
<b>Direct marketing prohibitions and consents</b>	Comply with the data subject's wish to receive or not receive direct marketing	Our legal obligation to comply with the prohibition on direct marketing	

<p><b>Information related to the events you attend</b> such as registration details, special dietary requirements, billing information</p>	<p>Organizing events</p>	<p>Our legitimate interest to host events and, if necessary, to bill</p> <hr/> <p>Consent for health information (e.g. allergies)</p>
<p><b>Information about the contracting party and the contract</b>, such as information about past and valid contracts, correspondence and other communication with you, payment information and information you voluntarily provide to our systems, credit information (including your personal identification number).</p>	<p>Fulfillment of our contractual and other undertakings and obligations</p>	<p>Implementation of the agreement</p>
	<p>Billing</p> <p>Customer relationship management; Ensure tenant's ability to pay rent (credit information of a person who is operating under private trader or general/limited partnership partner); business risk assessment; protection of property</p>	<p>Our legitimate interest in managing and developing the relationship with our clients, assessing our business risk and our property</p>
	<p>Bookkeeping, Obligations related to sanctions</p>	<p>Legal obligation</p>
<p><b>Business prohibitions</b></p>	<p>Obligation not to enter into a contract with a person subject to a business prohibition (company name or company director)</p>	<p>Legal obligation</p>
<p><b>Information relating to the maintenance, repair and construction of real estate</b>, such as information on the persons working on the site, information on employees in accordance with the Act on Contractors' Obligations and Liability, information on the site and the persons working on the site to be submitted to the authorities.</p>	<p>The right and obligation of the developer and/or main contractor to ensure that mandatory legislation (e.g. Regulation on the Safety of Construction Work, Act on Contractors' Obligations and Liability) is complied with on a joint construction site.</p>	<p>Legal obligation</p> <hr/> <p>Our legitimate interest in ensuring that our contractors comply with their contractual and legal obligations</p>
<p><b>Security incident report</b>, description of the security incident, time stamps related to the security incident, possible information on the report of a crime to the police including the name of the perpetrator</p>	<p>Protection of property, ensuring the safety of the property and of the persons operating/operating on it</p>	<p>Our legitimate interest in protecting property and ensuring the security of the property</p>

<p><b>Information required by sanctions-related legislation and money laundering law to comply with obligations related to money laundering and terrorism and sanctions, such as information on politically exposed persons, information on beneficial owners, verification of personal data from sanctions lists, copy of ID card or passport in exceptional circumstances.</b></p>	<p>The legal obligation of the controller and the owner of the controller to check the information of the tenants, as required by the law on sanctions and money laundering.</p>	<p>Legal obligation</p> <hr/> <p>Legitimate interest to assess and cover our business risks</p>
<p><b>Information on the technical connection and the terminal used, such as IP address, device ID or other identifiers and cookies.</b></p>	<p>Targeting advertising on our online services</p>	<p>Consent</p>

**DATA SOURCES**

Data is collected from the data subject, for example through a contract with the controller or in the context of contacting the controller orally or in writing. Data is also collected in connection with registration and participation in events or in the context of feedback/contact or later in the customer relationship or cooperation. Personal data may also be collected and updated from public authorities, credit reference agencies, contact information providers and other similar trusted sources or publicly available sources within the limits of applicable law.

**DATA TRANSFERS, DISCLOSURE AND RECIPIENTS**

As a rule, the controller will not disclose the contents of the data file to outsiders. However, the controller may disclose personal data to authorities or contract and cooperation partners or affiliated companies as allowed and obligated by legislation.

In processing the personal data referred to in this document, the controller may use external processors and, for this purpose, disclose data to its cooperation partners that are assigned by the controller to process the data on behalf of the controller and in accordance with the controller’s instructions on the basis of a data processing agreement. We have outsourced IT management to an external service provider, whose servers are managed and protected by them and on which personal data is stored.

The data will not be processed or transferred outside the European Union or the European Economic Area unless required by the technical implementation of the processing. When personal data is processed outside the EU/EEA, we will ensure that the subcontractor is bound by the EU Commission's Model Clauses on the processing of personal data.

**A GENERAL DESCRIPTION OF THE TECHNICAL AND ORGANISATIONAL MEASURES**

The data is collected in files protected by firewalls, passwords and other technical means. The physical databases are located in locked and controlled premises.

Personal data may be stored in a service provided by a third party selected by the controller if said service is considered secure and in compliance with generally accepted data protection policies. The controller and the third party in question shall ensure the confidentiality and security of the personal data and its processing.

Only the employees of the controller and service provider authorised due to their work and/or duties to process the data in this data file may access the system containing the personal data.

## RETENTION PERIOD OF PERSONAL DATA

We regularly assess the necessity of data retention in the light of applicable law. In addition, we will take reasonable steps to ensure that no personal data relating to data subjects is kept that is incompatible, outdated or inaccurate for the purposes of the processing. We will correct or destroy such data without undue delay.

Personal data may be kept for longer than the retention periods set out below if there is a specific reason to do so, such as in connection with suspected criminal offences and the related investigation. After the termination of the customer relationship, personal data related to the customer's payment transactions may also be stored for longer periods than those mentioned above, in accordance with the retention periods required by the Accounting Act.

Data group	Retention period
Information related to leases	10 years after the termination of the contractual relationship
Information relating to service contracts	10 years after the termination of the contractual relationship
Credit information (private trader, general/limited partnership partner)	6 months after their inspection
Information related to sanctions and money laundering legislation	5 years in accordance with legislation
Information on a business prohibition	6 months (if no agreement is reached) or 2 years in accordance with the Act on the Contractor's Obligations and Liability
Information related to property maintenance, repairs and construction projects	2-6 years from completion of contract/construction project or according to Accounting Act (depending on applicable legislation)
Secure incident report	1 year
Participation in events	1 month after the event
Information related to direct marketing (contact persons for businesses)	until the person requests to be removed from the mailing list and/or the person's email address is inactive
Customer service contacts/feedback received by the Controller	1 year
Cookies used on the website	See cookie-specific periods of expiry in the cookie policy.

## RIGHTS OF THE DATA SUBJECT

In accordance with the applicable data protection legislation and under the stipulated preconditions, the data subject has the right to:

Right	In which situations
Access the data stored about yourself	Always
Request the correction of incorrect or outdated data	Always
Request the erasure of data	Where the client has withdrawn consent or where one of the other grounds set out in Article 17 of the GDPR is met.
Withdraw consent	When processing is based on consent
Object to the data processing	Where the processing is based on legitimate interest and involves a particular personal situation or where the data are processed for direct marketing purposes.
Request restriction of processing (e.g. until requests for data are resolved and settled)	If the accuracy of the data is contested or one of the other grounds set out in Article 18 of the GDPR is met.
File a complaint about the processing of your personal data with the Data Protection Ombudsman	Always

Any requests related to exercising the rights of the data subject should be sent to the address mentioned above under the section Controller.

If necessary, the controller may ask the data subject to specify their request in writing and verify the data subject's identity before processing the request. The controller may also refuse the request on grounds stipulated in data protection legislation. We will respond to requests and enquiries from the data subject concerning the exercise of data subjects' rights within one month.