

## Privacy notice – Customer Register

1. Data controller	Alexander Incentives Oy, Pohjoisesplanadi 37 A, 00100 Helsinki
2. Contact person in matters involving the register	Leena Tyynilä leena.tyynila@alexander.fi
3. Name of register	Customer register
4. Purpose and basis of processing personal data	<p>Alexander Incentives Oy (“<b>Alexander</b>”) processes personal data to comply with the contract between the data subject or the organization represented by him/her and the data controller, to comply with the legal obligations of the data controller, based on the explicit consent of the data subject or customer relationship or other appropriate connection, in which case the lawful processing purpose is the legitimate interests of the data controller. Personal data is processed especially for the following purposes.</p> <ol style="list-style-type: none"> <li>1) Delivery of services subscribed by the data subject or the organization represented by the data subject and performances and obligations related to the delivery of the service;</li> <li>2) Invoicing and monitoring validity of the invoicing;</li> <li>3) Management, administration and development of customer relationships and other appropriate connection based relationships comparable with a customer relationship such as provision of customer service and execution of customer communications;</li> <li>4) Development of production of services and business activities and customer service by using e.g. customer satisfaction surveys;</li> <li>5) Analysis and compilation of statistics for business purposes;</li> <li>6) Advertising and marketing, including targeting of marketing and electronic direct marketing, but only to the extent allowed by the legislation or when the data subject has given his/her consent to it;</li> <li>7) To prevent and investigate malpractice and abuse, which can be executed e.g. with camera surveillance and other technical monitoring.</li> </ol> <p>Alexander can transfer personal data of the data subject after the expiry of the customer contract or the appropriate connection to the direct marketing registers of the companies belonging to the Alexander group of companies within the limits defined in the legislation.</p>

	<p>The transfer of personal data as described in this privacy notice is partly based on the contract between the data subject and the data controller or between the organization represented by the data subject and the data controller. When subscribing to a service on behalf of him/herself or the organisation represented by him/her and in connection with the delivery of the services, the data subject is obligated to provide the data controller with certain personal data for the purposes defined in this privacy notice. The aforementioned does not apply to situations where the transfer of data or certain kind of processing is based on the consent of the data subject. The failure to provide the personal data may result in the data controller being prevented from performing its contractual or other obligations or commitments, which may lead to the data subject or the organisation represented by him/her not being able to subscribe to a service or to a situation where the subscribed service cannot be delivered.</p>
<p><b>5. Processed data contents</b></p>	<p>For the purposes described above we process the following information of the data subject:</p> <p>Basic information such as:</p> <ul style="list-style-type: none"> <li>• Name of the person</li> <li>• Contact details (such as address, phone number and e-mail address)</li> <li>• Title or profession</li> <li>• Data on the title and name of the company, if the person is representing a company</li> <li>• Possible information on the duties or position of the data subject in business life or public position</li> </ul> <p>Other information related to the customer relationship and other appropriate connection such as:</p> <p>Information on the contract, subscription, services and related to invoicing and payments. Credit status check information when the credit status of the data subject is checked. Information on the customer relationship and appropriate connection between the parties. Possible direct marketing permissions and prohibitions.</p>
<p><b>6. Regular sources of data</b></p>	<p>Personal data is collected mainly from the data subject him/herself, e.g. in connection with forms or agreements to be filled in and signed as part of a service subscription. During a continuing customer relationship and in connection with delivery of subscribed services, data on the data subject is collected from the data subject him/herself also in other ways, e.g. in various customer services situations via phone or email, or in connection with service deliveries through partners used by the controller.</p> <p>Personal data can be collected and updated also from other registers of the data controller and companies belonging to the same group of companies and economic combinations and from authorities and companies providing services pertaining to personal data, such as Suomen Asiakastieto Oy.</p>

<p><b>7.</b> Regular disclosure of data</p>	<p>Data is disclosed based on applicable legislation to authorities, such as tax and police authorities for e.g. taxation and other purposes related to reporting to authorities.</p> <p>If the controller sells its business or part of it or otherwise reorganizes its business, the controller will disclose personal data to buyers and their advisors in accordance with the applicable legislation in force at the time.</p>
<p><b>8.</b> Transfer of data to countries outside the EU or EEA</p>	<p>Customer data is stored on servers located in the European Economic Area (EEA). No data is transferred to parties outside the EEA.</p>
<p><b>9.</b> Retention period</p>	<p>The retention period of personal data depends on the information concerned and its purpose of use. The controller retains personal data at least as long as they are needed for the execution of the informed purposes of use, such as in the performance of the controller's contractual obligations or provision of customer service. The retention period of personal data is typically linked to the term of a contract with the data subject or an organization represented by the data subject. Statutory retention periods may also apply to personal data. For instance, the accounting regulation requires that the information included in the accounting materials are retained for six or even ten years depending on the laws applicable to controller at a given time.</p> <p>When personal data are no longer needed, the data is destroyed in a secure way or irrevocably anonymized.</p>
<p><b>10.</b> Your rights</p>	<p>The General Data Protection Regulation provides the data subject with several rights based on which the data subject can in many situation himself/herself decide on the processing of his/her personal data. The data subject may use the following rights with regard to Alexander to the extent Alexander acts as the controller to the personal data of the data subject in question.</p> <ul style="list-style-type: none"> <li>- <b>Right of access:</b> The data subject has the right to obtain a confirmation from the controller on whether the controller processes personal data concerning the data subject and the right to access such data. The data controller may ask the data subject to specify his/her access request, amongst others, with regard to the details of the data to be delivered.</li> <li>- <b>Right to rectification:</b> The data subject has the right to obtain from the controller the rectification of inaccurate personal data concerning him/her processed by the controller, or to have incomplete personal data processed by the controller to be completed.</li> <li>- <b>Right to be forgotten:</b> The data subject has the right to obtain from controller the erasure of personal data related to him/her and the</li> </ul>

controller has the obligation to erase such data in case there is no longer a legal ground for the processing of such data or, where the legal or contractual obligation binding the controller related to the storing of the personal data has ended or, where the data subject has withdrawn his/her consent to the processing of his/her personal data.

- **Restriction of processing:** In certain cases, where so prescribed by law, the data subject may have the right to obtain from the controller restriction of processing of his/her personal data.
- **Right to data portability:** The data subject may, subject to certain conditions prescribed by law, have the right to receive the personal data concerning him/her processed by the controller in a commonly used and machine-readable format, and the right to transmit those data to another controller without hindrance from the original controller.
- **Right to object to processing of his/her personal data:** In certain cases, the data subject may have the right to object to processing of personal data concerning him or her. The right to object is applicable in such situations in particular where the processing of personal data is based on the controller's legitimate interest. In such situations the controller has to follow the data subject's request, unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

To the extent the processing of personal data has been based on the data subject's unambiguous consent, the data subject has, at any time, the right to withdraw his/her consent regarding the processing.

In certain cases the data subject can access and rectify his/her data by directing a request to customer service of Alexander (contact information below). Requests concerning the erasure, portability or the objection to processing shall be directed to customer service of Alexander.

Contact information of the customer service: **info@alexander.fi**

Alexander will take measures based on the data subject's request without delay, and provide the data subject with the information concerning the measures related to the use of the data subject's rights primarily within one month from receiving the data subject's request.

In addition, the data subject has the right to lodge a complaint with the supervisory authority on the processing of the personal data by the controller. The

	<p>complaint shall be made to the competent supervisory authority, in Finland to the Data Protection Ombudsman, in accordance with its instructions.</p>
<b>11. Data security</b>	<p>Databases, in which the register data is stored, are protected by firewalls, passwords and other technical means. The databases and their backups are located in locked up spaces.</p> <p>The controller will make sure that access to data is permitted only to those of its employees and only to those employees of the companies acting on behalf of it who have the need to access the data for the execution of the tasks assigned to them.</p>
<b>12. Amendments to the privacy statement</b>	<p>This privacy statement may be updated from time to time. You can tell when changes have been made to the statement by referring to the "Last Updated" date on top of this page. We encourage you to familiarize yourself with the privacy statement regularly for any amendments.</p> <p>If we materially change the ways in which we use and disclose personal data, we will inform of it separately.</p>