

## Privacy notice – Direct Marketing Register

|  |  |
|--|--|
| <p>1. Data controller</p>                                  | <p>Alexander Incentives Oy, Pohjoisesplanadi 37 A, 00100 Helsinki</p>  |
| <p>2. Contact person in matters involving the register</p> | <p>Leena Tyynilä<br/>leena.tyynila@alexander.fi</p>  |
| <p>3. Name of register</p>                                 | <p>Direct marketing register</p>   |
| <p>4. Purpose and basis of processing personal data</p>    | <p>Alexander Incentives Oy (“<b>Alexander</b>”) processes and uses the information in the register for advertising and marketing purposes, including targeting marketing and electronic direct marketing, opinion or marketing surveys, invitations to events and any comparable communications.</p> <p>Alexander processes personal data based on consent of the data subject or customer relationship or other appropriate connection, in which case the lawful purpose for processing is the legitimate interests of the data controller.</p> <p>Alexander can transfer personal data of the data subject to the direct marketing registers of the companies belonging to the Alexander group of companies within the limits defined in the legislation.</p>  |
| <p>5. Processed data contents</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 employer and position or duties of the data subject, 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 customer relationship and communications related to appropriate connection and possible direct marketing permissions and prohibitions.</p> |
| <p>6. Regular sources of data</p>                          | <p>Personal data is collected mainly from the data subject him/herself, marketing lists acquired by Alexander or the customer register of Alexander or public</p>  |

|  |   |
|--|---|
|  | sources. 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.  |
| 7. Regular disclosure of data                          | Data can be disclosed to companies belonging to the Alexander group of companies. Alexander does not disclose the data to third parties.  |
| 8. Transfer of data to countries outside the EU or EEA | Customer data is stored on servers located in the European Economic Area (EEA). No data is transferred to parties outside the EEA.  |
| 9. Retention period                                    | The controller retains personal data at least as long as they are needed for the execution of the informed purposes of use, unless the data subject has prohibited direct marketing.<br><br>When personal data is no longer needed, the data is deleted in a secure way.  |
| 10. Your rights  | <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 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.</li> <li>- <b>Restriction of processing:</b> 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.</li> </ul> |

|                                 |   |
|---------------------------------|---|
|                                 | <ul style="list-style-type: none"> <li>- <b>Right to data portability:</b> 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.</li> <li>- <b>Right to object to processing of his/her personal data:</b> 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.</li> </ul> <p>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.</p> <p>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.</p> <p>Contact information of the customer service: <b>info@alexander.fi</b></p> <p>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.</p> <p>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 complaint shall be made to the competent supervisory authority, in Finland to the Data Protection Ombudsman, in accordance with its instructions.</p> |
| <p><b>11. Data security</b></p> | <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 be-</p>   |

|  |   |
|--|---|
|  | half of it who have the need to access the data for the execution of the tasks assigned to them.  |
| <b>12.</b> Amendments to the privacy statement | <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> |