

Privacy notice – Customer Register

1. Data controller	Aktia Alexander Corporate Finance Oy Pohjoisesplanadi 37 A, 00100 Helsinki Puh. 010 292 5810
2. Contact person in matters involving the register	Marjut Rossinen Phone: +358 10 292 5810 info@alexander.fi
3. Name of register	Customer register of Aktia Alexander Corporate Finance Oy
4. Purpose and basis of processing personal data	<p>Aktia Alexander Corporate Finance Oy ("Alexander") 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"> 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; 2) Invoicing and monitoring validity of the invoicing; 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; 4) Customer service by using e.g. customer satisfaction surveys; 5) Analysis and compilation of statistics for business purposes; 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; 7) To prevent and investigate malpractice and abuse, which can be executed e.g. with camera surveillance and other technical monitoring.

	<p>Alexander can transfer personal data of the data subject after the expiry of ^{2/5} 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>The provisions of the General Data Protection Regulation (2016/679) are applied to all processing of personal data as the general legislation on the matter. Applicable provisions of law are included also in the Act on Electronic Communications Services (917/2014).</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"> • Name of the person • Contact details (such as address, phone number and e-mail address) • Data on the employer of the data subject and the employer's address • Customer number for invoicing purposes • Data on the employer and position or duties of the data subject, if the person is representing a company <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. Information on the customer relationship and appropriate connection between the parties. 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. During a/5 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>7. Regular disclosure of data</p>	<p>Alexander does not primarily disclose any information to third parties.</p> <p>Data can be 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>For the purposes stated in this privacy policy, the personal data may be disclosed, when necessary to selected third parties, such as third-party service providers. We take care of the agreements required by data protection regulation with the parties we use to process personal data.</p>
<p>8. 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>9. 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. According to Act on Preventing Money Laundering and Terrorist Financing (444/2017) identifying data shall be retained in a reliable manner for a period of five years after the end of the permanent customer relationship.</p> <p>When personal data are no longer needed, the data is deleted in a secure way or irrevocably anonymized.</p>
<p>10. 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>

- (i) **Right of access:** 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.
- (ii) **Right to rectification:** 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.
- (iii) **Right to be forgotten:** 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.
- (iv) **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.
- (v) **Right to data portability:** The data subject has the right to receive the personal data that he or she has provided to the controller in a structured, commonly used, and machine-readable format and, if desired, transmit that data to another controller. The right to data portability applies on the processing of the personal data based on consent or a contract.
- (vi) **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.

All access or rectification requests should be addressed to the contact person defined in Section 2 of this privacy notice. Requests for deletion or transmission of the data or objection of processing of data should be addressed to the contact person defined in Section 2 of this privacy notice.

	<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>11. Data security</p>	<p>We take commercially reasonable physical and technical measures to protect the personal data of the data subjects. For example, our IT systems use SSL-encryption and our servers are equipped with tools designed for prevention of denial of service attacks and viruses. All servers used by us are protected by passwords. Access to the personal data has been restricted to the individuals that have a right to access the data in question. Passwords are changed on a regular basis.</p> <p>If you believe that your personal data has been compromised, contact immediately the contact person defined in Section 2 above.</p>
<p>12. Amendments to the privacy statement</p>	<p>This privacy statement may be updated from time to time. The time of the most recent changes made to the statement can be found 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. If we materially change the ways in which we use and disclose personal data, we will inform of it separately.</p>