

PRIVACY POLICY, STAKEHOLDER REGISTER MERIVAARA CORPORATION

1. The data controller

Merivaara Corporation

Puustellintie 2

15150 Lahti

+358 3 3394611

2. The person responsible for register issues

Merja Rautiainen

merja.rautiainen@merivaara.com

Contact in register matters

Tanja Venäläinen

tanja.venalainen@merivaara.com

3. Name of the register

Merivaara group stakeholder register

4. Why personal data is processed and for how long

The information gathered in this register is used for the purpose of running, maintaining and developing the business of the data controller, in order to manage customer and stakeholder relationships, and to target and to analyse supply. This information is also used for customer and stakeholder communications, including possible direct marketing.

The data in this register is stored and processed as long as it is required for the purpose for which it was collected. Merivaara Corporation tries always to limit the extent of data contents and data retention times to a minimum. However, legal requirements, such as those laid down by accounting laws, may require a set period of retention. Employment applications are retained for 1 year after the recruitment process has ended.

5. The data content of the register

The register can contain the following kind of fundamental personal data: first name, last name, email address, phone number, street address, postal code, city, country, and continent, as well as the company.

Equally, information that arises from the relationship of the customer ordering products and services, and us providing and invoicing them, any other information relating to customer relationship management, customer order history information, information related to customer experience and marketing.

6. Regulated sources of data

As a general rule, data is obtained from the stakeholder group or the person him/herself. Data will be updated as needed, and its accuracy will be reviewed regularly.

7. Regulated disclosure

Merivaara Corporation will not disclose the information contained in the stakeholder register to third parties. However, information will be shared with the authorities if their right to obtain the information is based on law.

8. Transfer of data outside the EU or the European economic area

Information may be transferred outside the EU/EEA countries within the limits of law. When there is such a transfer of data, Merivaara Corporation will make sure that the country the data is transferred to has adopted similar rules of data protection as are applied in Finland and in the EU.

9. How the register is protected

The register is protected by technical and organisational means. Register data is stored on servers and systems that are protected by firewalls, passwords, and other technical means. Access to personal data shall be granted only if it is necessary for data processing.

A. Manual data

The information in the register is collected using forms returned by those registered. This information is stored securely.

Data input assistants processing forms: Data input assistants may transfer data into an electronic format.

B. Electronically processed data

There are specific instructions on the use of the electronic register. Access to the collected information is limited by both network technology, and personal IDs and passwords.

Only a limited number of persons processing the actual data have access to the information.

10. Right of review

Those who appear in the register (data subjects) have the right to review their data. Anyone who wants to verify his/her data, should submit a request thereof to the contact person mentioned above.

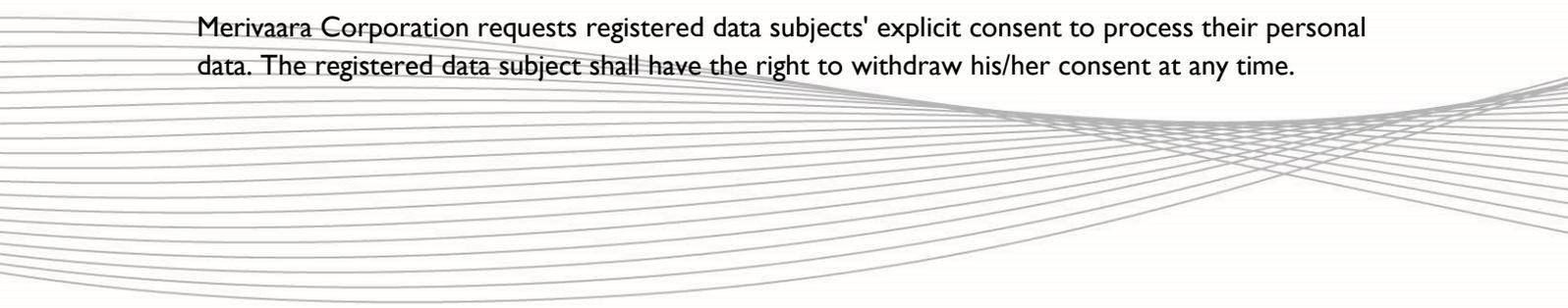
11. The right to require the correction of information

The data controller corrects the inaccurate or incomplete information in the register at the request of the data subject. Requests to correct data contained in the register should be directed to the register contact person.

The data subject shall have the right to request that the controller rectify inaccurate and incorrect personal information concerning the data subject without any unnecessary delay. In view of the purposes for which the data in question was processed, the data subject shall have the right to augment his/her personal data by, e.g., submitting additional information.

12. Consent

Merivaara Corporation requests registered data subjects' explicit consent to process their personal data. The registered data subject shall have the right to withdraw his/her consent at any time.



13. The right to prohibit and to limit the processing of personal data

The data subject shall have the right to have his/her personal data removed without undue delay, and the controller is obliged to delete their personal data, without undue delay, provided that one of the following criteria is met:

- a) personal information is no longer needed for the purposes for which they were collected or for which they were otherwise processed
- b) the registered data subject cancels his/her consent
- c) the personal data has not been processed according to law
- d) the personal data must be removed in order to comply with a legal obligation based on EU or Member State legislation that applies to the controller
- e) the personal information was collected in the framework of provision of information society services

In addition, the data subject shall have the right to limit the processing of his/her personal data, subject to the following conditions:

- a) the registered data subject contests the accuracy of his/her personal data, in which case the processing of the data shall be suspended for a period enabling the controller to verify their accuracy;
- b) the processing is unlawful and the data subject opposes the deletion of his/her personal data and requires instead the restriction of its use;
- c) the controller no longer needs such personal information for processing purposes, but the registered data subject needs them in order to establish, present or defend a legal claim;
- d) the registered data subject has objected to the processing of his/her personal data pending the verification of whether the legitimate grounds of the controller override those of the data subject.

Requests to delete information must be directed to the contact person.

14. The right to make a complaint

The data subject shall have the right to make a complaint concerning the processing of his/her personal data to the data protection agency.

