

PRIVACY POLICY – ELENIA OY

1. Background information regarding the processing of personal data

This privacy policy (**Privacy Policy**) provides information in accordance with the European Union General Data Protection Regulation (2016/679) (**GDPR**) on how Elenia Oy (**Elenia**) processes personal data.

Personal data means any information relating to an identified or identifiable natural person (i.e. data subject). In this Privacy Policy, **data subject** or **you** means either a) Elenia's customer or customer's representative, b) Elenia's prospective customer or other person, who is in contact with Elenia regarding Elenia's services or products or, for example, when reporting a related defect (each one being a **prospective customer**), c) landowner of the Elenia Kuitu service area or a holder of a lease or other right to use the area (each **landowner**); or d) Elenia's affiliate's (such as contractor's or subcontractor's) representative.

Elenia processes the data subject's personal data in accordance with this Privacy Policy, the GDPR and other applicable legislation. Elenia may amend this Privacy Policy in the event of changes in the processing of personal data, for example due to changes in the services offered by Elenia or changes in legislation. Elenia will publish any updated Privacy Policy on its website.

If you use Elenia's websites, Elenia may use cookies or similar technologies to collect information relating to the use of the websites or the terminal device. More information about the use of cookies on Elenia's website is provided in the cookies policy.

In addition to the processing described in this Privacy Policy, Elenia processes certain personal data in connection to, for example, the camera surveillance and access management of physical facilities, in connection to visitor policies and in connection to human resources practices (processing personal data of employees and job applicants). For information about the processing of your personal data in these situations, please contact us at tietosuoja@elenia.fi.

2. The contents of this Privacy Policy

This Privacy Policy consists of the following sections.

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3. Who is responsible for the processing of your personal data?

Elenia is the data controller of the personal data of its customers and their representatives, prospective customers, landowners and affiliates. This Privacy Policy outlines the processing of your personal data in these situations.

To the extent that Elenia processes your personal data on behalf of and for the account of another company, for example when providing services related to customer services on behalf of said company, the data controller of your personal data is not Elenia but the other company on whose behalf Elenia acts.

In such situation, the processing of your personal data is set out in the privacy policy of said other data controller.

Elenia's business information is as follows:

Elenia Oy
 Patamäenkatu 7 33901
 TAMPERE
 Business ID: 2658611-8

The data protection officer is responsible for the processing of your personal data at Elenia. The data protection officer's contact details are as follows:

Data Protection Officer
 Patamäenkatu 7
 33901 TAMPERE
 Email: tietosuoja@elenia.fi

4. For what purposes and on what basis does Elenia process your personal data?

PROCESSING OF CUSTOMER'S PERSONAL DATA		
Processed personal data	Purpose of processing	Basis for processing
<ul style="list-style-type: none"> Basic information of the customer, such as name, date of birth, personal identity number, business ID, customer number, metering point number, native language and nationality; Information on company contact persons, such as employer information and professional status; Contact information, such as address, phone number, and email address; Information related to payment and invoicing, such as invoicing, payment and collection information, estimates, standard compensation and indemnity information, information on financial position; Information related to customership and agreements, such as information about the agreement, subscription, valid and expired services, transaction information, recorded calls, correspondence with Elenia and other contacts and information related to marketing; Information related to services and products, such as subscription, validity, adjustment and expiration information, information related to disruptions, necessary information on the use of online and mobile services, information provided by the customer about interests, cookies and information related to their use; and Any other information processed with the customer's consent. 	<ul style="list-style-type: none"> Management of customer relationships and tasks related to Elenia's business; Provision of Elenia's services and products and related informing; and Investigation of possible abuses. 	<ul style="list-style-type: none"> Implementation of the agreement between Elenia and the customer; Elenia's legitimate interest based on the implementation of the agreement between Elenia and the customer; Compliance with Elenia's statutory obligation; Customer's consent (if consent has been requested and given); To the limited extent that Elenia processes the customer's sensitive personal data, the processing is required by law.

PROCESSING OF PROSPECTIVE CUSTOMERS' PERSONAL DATA

Processed personal data	Purpose of processing	Basis for processing
<ul style="list-style-type: none"> • Basic information of the prospective customer, such as name, date of birth, personal identity number, business ID, customer number, metering point number, native language and nationality; • Information on companies contact persons, such as employer information and professional status; • Contact information, such as address, phone number, and email address; • Information related to prospective customership and agreements, such as information about the agreement, subscription, valid and expired services, transaction information, recorded calls, correspondence with Elenia and other contacts and information related to marketing; and • Any other information processed with the customer's consent. 	<ul style="list-style-type: none"> • Provision of Elenia's services and products and related informing. 	<ul style="list-style-type: none"> • Implementation of pre-contractual measures between Elenia and the prospective customer; • Compliance with Elenia's statutory obligation; • Prospective customer's consent (if consent has been requested and given).

PROCESSING OF LANDOWNERS' PERSONAL DATA

Processed personal data	Purpose of processing	Basis for processing
<ul style="list-style-type: none"> • Basic information, such as name, date of birth, native language and nationality; • Personal identity number or business ID (in relation with electronic identification); • Basic information on the property, such as property ID and location information; • Information related to land use and agreements, such as agreement number, compensation amount for the land use, payment details of the landowner; and • Any other information processed with the landowner's consent. 	<ul style="list-style-type: none"> • Identification of the landowner and the property; • Conclusion and implementation of land use agreements; • Management of co-operation relationship and related informing. 	<ul style="list-style-type: none"> • Implementation of contractual and pre-contractual measures between Elenia and the landowner; • Compliance with Elenia's statutory obligation; • Landowner's consent (if consent has been requested and given).

PROCESSING OF AFFILIATE'S REPRESENTATIVES' PERSONAL DATA

Processed personal data	Purpose of processing	Basis for processing
<ul style="list-style-type: none"> • Basic information, such as name, date of birth and native language; • Personal identity number or business ID (in relation with electronic identification); • Information on employment, such as employer information and professional status; • Contact information, such as address, phone number, and email address; • Work planning, work tasks and measures performed; • Information related to electrical safety and safety at electrical work; • Information on safety and environmental incidents, work accidents and environmental damage and possible remarks and warnings about non-compliance; • Information on qualification and education; and • Location information and any other information processed with the affiliate's representative's consent. 	<ul style="list-style-type: none"> • Identification of affiliate's representative • Coordination and monitoring of work tasks. 	<ul style="list-style-type: none"> • Elenia's legitimate interest based on the implementation of the agreement between Elenia and the affiliate or between Elenia and the customer; • Compliance with statutory obligations; • Affiliate's representative's consent (if consent has been requested and given)

5. Does Elenia process your personal data based on legitimate interest?

In addition to the purposes and basis for processing described in the Section 4, Elenia may process your personal data based on legitimate interest, for the following purposes:

- Direct marketing and other commercial communication, regarding the services or products of Elenia or its group companies, unless you have refused such direct marketing or communication.
- Implementation of an agreement between Elenia and the customer, when Elenia processes the personal data of the corporate customer's representative
- Implementation of Elenia's products and services or implementation of an agreement between Elenia and an affiliate when Elenia processes the personal data of employees and representatives of affiliates involved in the implementation of products and services
- Quality assurance, maintenance and development of Elenia's services, including conducting customer satisfaction surveys
- Providing efficient customer service, including call recording, to ensure the quality of customer service and to confirm assignments
- Providing efficient customer service in relation with Elenia Kuitu -service bundle, together with the service providers involved in the service
- Preparing for disruptions and ensuring information security
- Maintaining and supporting Elenia's website, including adjusting the website's features to improve user experience
- Statistical analysis and research purposes
- Archiving and storage of documents
- Elenia's internal reporting and statistics

Processing of personal data based on legitimate interest is customary in Elenia's line of business. Your interests or freedoms or the protection of your personal data are not unnecessarily compromised by such processing.

6. Where does Elenia obtain your personal data?

Elenia receives the personal data from the following sources:

- From the data subject themselves, particularly in the following events:
 - A customer or a prospective customer contacts Elenia;
 - A customer or a landowner enters into an agreement with Elenia;
 - A customer or a customer's representative registers as a user of Elenia's services or products;
 - Elenia's affiliate's representative registers as a service provider for Elenia;
 - A customer uses Elenia's services; or
 - Other relevant connection is established between Elenia and the data subject.
- From third parties, particularly from (and in accordance with the current legislation):
 - Public sources, such as Land Information System in Finland (KTJ) and Finnish Trade Register;
 - Affiliate's representative's employer;
 - Authorities;
 - Elenia's group companies; and
 - Other possible third parties in accordance with the law.

7. To whom does Elenia transfer or disclose your personal data?

In order to provide Elenia's services to customers, in certain circumstances your personal data will be shared with recipients outside Elenia as described below. In the situations described below, your personal data will be transferred or disclosed in accordance with and to the extent permitted by legislation, regulations and regulatory guidelines.

- Elenia will share your personal data with Elenia's service providers to the extent required by the purposes for which your personal data is processed. These service providers process your personal data on behalf of Elenia as data processors. Service providers include, in particular, contracting partners, IT system service providers, providers of billing and receivables management services as well as service providers who provide Elenia with services related to marketing, customer satisfaction surveys, and communications and coordination and monitoring of affiliates' workflow.
- Elenia will disclose your personal data to recipients who will become data controllers of your personal data. These recipients of personal data are Elenia's debt collection service providers as well as professional service providers such as Elenia's auditor and financial and legal advisers. Elenia may also disclose personal data for statistical and research purposes to, for example, universities and other research organizations. Elenia also discloses, with the consent of Elenia Kuitu -service's customers, their personal data to service operators for the provision of content services and for their marketing, as well as based on legitimate interest for, in example, to handle inquiries from customers or potential customers related to the service, to correct faults and to ensure efficient customer service.
- Elenia may also share your personal data with Elenia's group companies based on legitimate interest, including processing of your personal data in the group companies' shared information systems, and share them to potential investors or owners, if Elenia's operations so require.
- Elenia may also share your personal data with parties involved in construction work as well as with authorities to the extent required by the services and products provided by Elenia, to address potential abuse or as required by law.

8. Does Elenia transfer your personal data to third countries?

Elenia may transfer your personal data outside the territory of the Member States of the European Union (EU) or the European Economic Area (EEA) if this is necessary for the above-described purposes for which the personal data is processed or for the technical implementation of the processing. The level of data protection outside the EEA may be lower than in the EEA. In such a situation, Elenia will apply appropriate safeguards to ensure the protection of your personal data, such as the Standard Contractual Clauses laid down in the European Commission decision on the transfer of personal data to third countries (available: https://ec.europa.eu/info/law/law-topic/data-protection/datatransfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en).

9. How long will Elenia retain your personal data?

Elenia will retain your personal data for as long as necessary for the purpose of processing your personal data, such as to enforce a customer, land use, cooperation, or other agreement between Elenia and you or Elenia and an affiliate, or to clarify the rights and obligations under it. In order to comply with the requirements of law and for the event of possible liability for damages, the retention period of personal data is at least 10 years from the end of the agreement.

However, Elenia may have an obligation to retain your personal data for a longer period than is necessary for the purpose for which it is processed, for example in the following situations:

- Legislation, regulations or regulatory guidelines require Elenia to retain personal data for a longer period (for example due to legislation, regulatory orders or guidelines related to accounting); or
- Retention of personal data is necessary to verify that Elenia has fulfilled its statutory obligations, or to investigate, defend or respond to legal claims.

Elenia regularly evaluates the retention periods of your personal data by the type of data. When your personal data is no longer needed, Elenia will delete or anonymize them as soon as possible.

If you would like to receive more information about the retention of your personal data for a specific purpose, you may contact Elenia's Data Protection Officer at tietosuoja@elenia.fi.

10. How does Elenia protect your personal data?

Your personal data stored in electronic format is protected by such reasonable technical means that are generally accepted in Elenia's industry, such as firewalls and passwords. Non-electronic material containing your personal data is located in locked premises, which are blocked from access by unauthorized persons.

Only designated employees of Elenia or service providers that act on behalf of Elenia have access to your personal data, subject to access rights granted by Elenia. Elenia provides periodic training to its employees participating in the processing of your personal data to ensure the necessary expertise to process the personal data.

Elenia observes applicable legislation, regulations and regulatory guidelines as well as industry associations' guidelines for ensuring confidential processing of your personal data.

11. What rights do you have regarding your personal data?

You have the rights listed below regarding your personal data processed by Elenia. The rights are not unconditional, and the exercise of each right is subject to exceptions and conditions in legislation and possible regulations and regulatory guidelines, which have not been exhaustively described below.

- **Right of access to personal data:** You have the right to receive confirmation on whether Elenia is processing your personal data. If Elenia does process your personal data, you also have the right to be informed, for example, of the purpose of processing your personal data.
- **Right to rectification of personal data:** You have the right to request Elenia to correct your inaccurate or incorrect personal data.
- **Right to erasure of personal data:** You have the right to request Elenia to delete your personal data, for example, if your personal data is no longer needed for the purposes for which they were collected or if the processing of your personal data is unlawful.
- **Right to object to the processing of personal data:** You always have the right to object to the processing of your personal data for direct marketing and other commercial communications. In addition, you have the right to object to the processing of your personal data based on a legitimate interest on grounds relating to your particular situation, unless Elenia demonstrates compelling legitimate grounds for the processing.

- **Right to withdraw consent:** If you have given your explicit consent to a particular processing, you may withdraw your consent at any time.
- **Right to restriction of processing:** You have the right to restrict the processing of your personal data while Elenia is investigating and verifying your request.
- **Right to data portability:** You have the right to receive the personal data that you have provided to Elenia for your use in a structured format, to the extent that the processing of your personal data is based on consent or an agreement between you and Elenia and the processing is carried out by automated means.

You may exercise your rights described above by contacting Elenia's Data Protection Officer at tietosuoja@elenia.fi.

12. Who can I contact regarding the processing of my personal data?

If you have any questions or remarks regarding the processing of your personal data or this Privacy Policy, or if you wish to exercise your rights, you may contact Elenia's Data Protection Officer at tietosuoja@elenia.fi.

Elenia needs to identify you before further processing of your request. If you do not provide the necessary additional information and you cannot be identified, Elenia has the right to refuse to process your request. Elenia will otherwise respond to your request in accordance with and within the timeframe required by the legislation.

If you are not satisfied with Elenia's response, or if you believe that Elenia is processing your personal data unlawfully, you may contact the relevant supervisory authority (in Finland: The Office of the Data Protection Ombudsman).