

# Elenia's Data Protection Policy

## Our mission

Electrifying life

## Our vision

The most responsible innovator of energy services and markets

## Our values

Responsibility for the future | Close to the customer  
Open and reliable cooperation | The courage to renew

**Our strategic objectives are to earn our customers' trust, operate efficiently, renew the energy markets and services, enable the green transition, mitigate climate change and advance carbon neutrality. Our Code of Conduct and management system promote responsibility and sustainable development in everything we do.**

### Commitments

We are committed to preventing accidents and incidents in accordance with the principles of the Zero Accidents Forum. The Zero Accidents Forum is a network of workplaces the aim of which is the continuous development of occupational safety and well-being at work and the dissemination of good practices.

We are committed to the UN Global Compact project and comply with its Ten Principles, which concern human rights, labour, the environment and anti-corruption.

We are committed to promoting the UN Sustainable Development Goals (SDG) of our choice in our operations.

We are committed to reducing our emissions in accordance with the Science Based Target (SBTi) initiative, while complying with the Paris Convention to reach our Net Zero goal.

We are committed to promoting energy efficiency in our business operations and services by participating in the national Energy Efficiency Agreements programme.

We are committed to complying with the procedures and environmental programme required by the Green Office certificate granted by WWF.

### 1. Purpose and Scope of Application

Elenia group companies (together "Elenia") regularly process a large amount of data, a significant part of which is information relating to an identified or identifiable natural person, personal data. Elenia is committed to the protection of personal data and promotes appropriate data management practices. Through its activities and compliance with this data protection policy, Elenia promotes lawfulness and transparency of the processing of personal data. This data protection policy contributes to Elenia's compliance with the accountability principle set forth in the EU General Data Protection Regulation (EU 2016/679, "GDPR") and is based on Elenia's strategies, values and ethical principles. The purpose of this data protection policy is to define the main principles, procedures and responsibilities pertaining to the processing of personal data in Elenia group.

The data protection policy is applied in all Elenia group companies and is binding on all employees and management of Elenia. Promoting data protection is an ongoing process, to which each member of the Elenia community is committed to in their own work and as a part of Elenia's business processes. This policy outlines the objectives of our data protection efforts.

The principles and objectives set forth in the data protection policy are supplemented by Elenia's data protection code of practice and supplementary data protection and information security guidelines. The purpose of this data protection policy, as well as the supplementary guidelines, is to ensure that Elenia group companies comply with the requirements of the GDPR and national data protection legislation in their operations, and that the compliance with the legislation can be demonstrated with appropriate and up-to-date documentation.

### 2. Principles relating to processing of personal data

In accordance with the GDPR, Elenia observes the following principles relating to processing of personal data:

- **Lawfulness, fairness and transparency:** Elenia processes personal data lawfully, fairly and in a transparent manner in relation to the data subject. Elenia shall always have a lawful purpose and legal basis for its processing operations. Data subjects are provided information relating to the processing of their personal data when personal data is collected and in Elenia's privacy notices.
- **Purpose limitation:** Elenia collects and processes personal data for specified, explicit and legitimate purposes. Personal data is not processed further in a manner that is incompatible with those purposes.
- **Data minimisation:** Elenia only processes personal data that is adequate, relevant and limited to what is necessary for the purposes for which the personal data is processed. Personal data that is not necessary for Elenia's tasks, needs and obligations shall not be processed. Elenia only processes personal data, if the purpose of the processing cannot reasonably be fulfilled by other means.
- **Accuracy:** personal data is accurate and kept up to date. Personal data processed by Elenia shall not be inaccurate, incomplete or outdated.
- **Storage limitation:** Elenia keeps personal data in a form which permits identification of a data subject for no longer than is necessary for the purposes for which the personal data is processed. A storage period or the criteria for determining the storage period is defined based on Elenia's legal obligations and the necessity of the personal data. Unnecessary personal data is deleted.
- **Integrity and confidentiality:** Elenia processes personal data in a manner that ensures appropriate security of personal data. Risks relating to the processing are assessed prior to the processing, and appropriate technical and organisational measures are implemented to protect personal data against unauthorised or unlawful processing and accidental loss, destruction or damage.
- **Data subject rights:** data subjects are informed of their rights pertaining to the processing of their personal data. Data subjects' requests, such as access requests, as well as other requests under data protection legislation, as well as other requests under data protection legislation, are fulfilled without undue delay and in line with the requirements of the data protection legislation. Elenia defines processes for exercising the data subjects' rights

The principles relating to the processing of personal data are observed when new processing operations are planned, as well as when the scope, nature or purpose of existing processing operations changes. Data protection by design and by default requires that the scope and applicability of the data protection principles is assessed on a case-by-case basis right from the start. By default, the processing method which best protects personal data is selected.

### 3. Data protection management

Data protection management is based on assignment of appropriate processes, roles and responsibilities, continuous monitoring of data processing operations, training of personnel and management, partner and supplier management and reporting of personal data incidents and breaches.

Elenia takes data protection into account in all its decisions. An adequate and appropriate level of data protection measures is ensured as part of Elenia's risk management process. The measures necessary for remedying identified failures and reducing risks are documented. To ensure compliance of Elenia's activities and to detect targets of improvement, the data protection measures are assessed through in-house controls and by using external evaluations and audits

### 4. Data subject rights

Data subjects are informed of the processing of their personal data, as well as the rights pertaining to the processing of their personal data. Data subjects' requests, such as access requests, as well as other requests under data protection legislation, are fulfilled without undue delay and in line with the requirements of the data protection legislation. Elenia defines processes for exercising the data subjects' rights.

Data subjects' rights are not unconditional, and the exercise of each right is subject to exceptions and conditions laid down in legislation and possible regulations and regulatory guidelines, which have not been exhaustively described below

- **Right of access to personal data:** Data subjects have the right to receive confirmation as to whether or not Elenia is processing their personal data. If Elenia does process a data subject's personal data, the data subject also has the right to be informed, for example, of the purposes of the processing, as well as the categories, recipients, and envisaged storage periods of the processed personal data. Further, Elenia shall provide the data subject a copy of the personal data undergoing processing.
- **Right to rectification of personal data:** Data subjects have the right to request Elenia to correct their inaccurate or incorrect personal data. Taking into account the purposes of the processing, data subjects shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.
- **Right to erasure of personal data ("right to be forgotten"):** Data subjects have the right to request Elenia to delete their personal data for example if the personal data is no longer needed for the purposes for which it was collected or if the processing is unlawful.
- **Right to restriction of processing:** Data subjects have the right to restrict the processing of their personal data for example when the accuracy of the personal data is contested by the data subject, when the processing is unlawful, or when the controller no longer needs the personal data for the purposes of the processing.
- **Right to data portability:** Data subjects have the right to receive the personal data they have provided to Elenia in a structured, commonly used and machine-readable format and have the personal data transmitted directly to another controller, where technically feasible.
- **Right to object to the processing of personal data:** Data subjects have the right to object, on grounds relating to their particular situation, at any time to processing of their personal data which is based on Elenia's or a third party's legitimate interests or task carried out in the public interest, including profiling based on those provisions. In addition, data subjects have the right to object at any time to the processing of their personal data for direct marketing, which includes profiling to the extent that it is related to direct marketing.
- **Measurement data:** In accordance with the government decree on electricity supply settlement and measurement, Elenia customers have a right to receive, free of charge, access to measurement data pertaining to the customer's consumption of electricity which Elenia has collected from the customer's metering point's electricity measurement equipment.

The Data Protection Officer of Elenia provides further guidance on the exercise of data subjects' rights.

### 5. Disclosure of personal data and outsourcing

When disclosing personal data to a third party, Elenia ensures that Elenia has the right to disclose the personal data and that the recipient of the personal data has the right to process such personal data. Elenia ensures that the data subject has been informed of the disclosure or that Elenia has obtained consent from the data subject for the disclosure of personal data. Further, Elenia observes the non-discrimination and confidentiality obligations of the Electricity Market Act when disclosing personal data.

When outsourcing the processing of personal data (for example, in connection with the procurement of a service involving the processing of personal data), Elenia only uses service providers who have the capacity to implement appropriate technical and organisational safeguards to meet the requirements of the data protection legislation. A written data processing agreement is always drawn up between Elenia and the data processor, setting out the conditions for the processing of personal data. In addition, the data processor is required to observe Elenia's information security requirements and operational requirements to ensure the data subjects' rights are protected.

### 6. Transfer of personal data outside the European Economic Area (EEA)

Transfer of personal data outside the European Economic Area requires caution. Personal data shall not be transferred outside the European Economic Area unless appropriate safeguards under the data protection legislation are in place to ensure the protection of personal data.

### 7. Data protection incidents and personal data breaches

Each member of the Elenia community is obliged to report data protection incidents and personal data breaches in line with Elenia's personal data breach notification instructions in force.

### 8. Monitoring and follow-up

Elenia is committed to respecting and promoting the human rights of its employees and stakeholders in all its operations in accordance with internationally recognised human rights. This is also expected from our partners. We promote diversity, equality and participation.

We facilitate the everyday life of our customers and ensure society's security of supply and continuity of operations at all times. We make preparations for the scarcity and decreased availability of natural resources. We continuously monitor and increase the safety of our electricity network.

Those in the managerial and supervisory positions lead by example in ethical and responsible business operations.

We comply with laws, regulations and good governance, and expect the same from our partners. Bribery and receiving bribes are strictly prohibited in all operations. We have zero tolerance for the black economy. We are involved in developing safety in the industry.

We identify, assess and process the risks and opportunities related to Elenia's objectives in accordance with Elenia's risk management policy. Through risk management, we ensure the achievement of our objectives and ensure the continuity of our operations in all situations.

We communicate openly about matters relating to protection of personal data with our personnel, partners and, when necessary, customers and stakeholders.

We are committed to listening to and engaging with our employees, employee representatives and our partners in decision-making on matters related to data protection.

We are committed to the continuous improvement of our data protection practices and to assessing their suitability, adequacy and effectiveness.

We continuously improve our operations and search for new opportunities to develop our processes. We evaluate our sustainability work annually against the Global Real Estate Sustainability Benchmark (GRESB).

*Elenia is Finland's second-largest distribution system operator and the largest customer service provider in the energy sector in Finland. We see to the maintenance and renewal of the electricity network, build electricity networks and connections together with our partner companies, measure our customers' electricity consumption and forward energy data to electricity suppliers. Our service business provides customer service as well as diverse services related to the electricity market for the energy sector and other infrastructure companies.*