

# PRIVACY POLICY – ELENIA FINANCE OYJ

## 1. Background information regarding 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 Finance Oyj (**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 a person who has subscribed to Elenia's newsletter on Elenia's website.

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. The processing of such information is subject to the terms of use of the websites, which are available on each website.

## 2. The contents of this Privacy Policy

This Privacy Policy consists of the following sections. Please click on the heading below to move to the section you want.

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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 those persons who have subscribed to Elenia's newsletter. Elenia's business information is as follows:

Elenia Finance Oyj  
Töölönkatu 4  
00100 HELSINKI  
Business ID: 2584057-5

Elenia has a data protection officer, who is tasked with overseeing the processing of your personal data. The data protection officer's contact details are as follows:

Data Protection Officer  
Patamäenkatu 7  
33901 TAMPERE  
E-mail: tietosuoja@elenia.fi

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

<b>PROCESSING OF PERSONAL DATA OF NEWSLETTER SUBSCRIBERS</b>		
<b>Processed personal data</b>	<b>Purpose of processing</b>	<b>Basis for processing</b>
<ul style="list-style-type: none"><li>Subscriber's e-mail address</li></ul>	<ul style="list-style-type: none"><li>Sending Elenia's newsletter</li></ul>	<ul style="list-style-type: none"><li>Subscriber's consent</li></ul>

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

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

- For quality assurance, maintenance and development of Elenia's newsletter, including conducting subscriber satisfaction surveys
- 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 directly from you as a data subject when you subscribe to Elenia's newsletter.

**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 are processed. These service providers process your personal data on behalf of Elenia as data processors. Service providers include, in particular, IT system service providers as well as service providers who provide Elenia with services related to communications.
- Elenia will disclose your personal data to recipients who will become data controllers of your personal data. These recipients of personal data may be Elenia's professional service providers, such as Elenia's legal advisors. Elenia may also disclose personal data for statistical and research purposes, including to universities and other research organizations.
- 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 authorities to the extent required 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 are 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/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-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 is necessary for the purpose of processing your personal data, mainly as long as your consent to the sending of Elenia's newsletter is valid.

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 because of regulatory orders or guidelines); or
- Retention of personal data is necessary to verify that Elenia has fulfilled its legal obligations, or to investigate, defend or respond to legal claims.

Elenia evaluates regularly the retention periods of your personal data by the type of data. When your personal data are 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](mailto:tietosuoja@elenia.fi).

## **10. How does Elenia protect your personal data?**

Your personal data in electronic format are 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 are 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. The withdrawal of consent does not affect the lawfulness of processing of your personal data based on consent before its withdrawal.
- **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](mailto: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](mailto: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).