

K. Hartwall Oy Ab Privacy Notice – Customer Relations, Sales, Marketing and Vendor Management

1 March 2021

The purpose of this privacy notice is to give you information regarding how K. Hartwall Oy Ab (“KHW” or “we”) processes personal data in customer relationship management, sales and marketing activities. This Privacy Notice also provides more information how we manage our contact data of KHW subcontractors’ and suppliers’ representatives relating to e.g. sourcing and purchasing activities.

1 Data controller and contact details in privacy matters

K. Hartwall Oy Ab / Privacy Matters
Kay Hartwallin tie 2, 01150 Söderkulla
Tel. +358 9 413 18 33
E-mail privacy-khw@k-hartwall.com

2 For what purpose is your personal information collected?

We collect information related to our business customers, leads and co-operation partners. When performing sales, marketing or customer relationship management activities, we process personal data of contact persons or decision makers of our customers, leads and co-operation partners. We also process personal data in order to facilitate KHW’s sourcing, purchasing, invoice handling and contract management activities. The processing of personal data is based on an agreement, legitimate interest of KHW (e.g. direct marketing) and your consent (e.g. related to the cookies).

The purposes of processing personal data are:

- To manage, develop, analyze and create statistics of relationship between KHW and customers or co-operation partners
- Vendor management
- Communication with customers, lead generation, direct marketing
- To collect customer feedback
- To plan and develop business operations and services
- Detecting and preventing fraud or misuse.

3 What type of information is collected about you?

We process following information on decision makers and contact persons of our customers, leads, vendors and co-operation partners (incl. newsletter subscribers, individuals who have requested a quote or submitted a contact request, and participants of events):

- Name, title and position of the company, company/employer, contact details e.g. postal address, e-mail address, phone number
- Customer history (e.g. participation in the events)
- Direct marketing permissions and/or prohibitions
- Possible other information relevant for the business relationship.

We collect following data on potential customer companies' or organizations' decision makers and contact persons:

- Name, company/employer e.g. postal address, e-mail address, phone number
- Information about individual's duties and position in business life or a public office
- Direct marketing permissions and/or prohibitions.

4 Where do we collect personal data from?

Personal data is collected from you by phone, in meetings, or by other equivalent means. Data is also collected in connection with the conclusion of the customer or collaboration agreement and otherwise obtained during customer or collaboration relationship. Personal data may also be originated from representatives of KHW based on their business interactions with individuals or collected and updated from public and private registers.

5 Who do we share your personal information and may information be transferred outside the EU or EEA?

Unless you prohibit the disclosure of your data, we may disclose data i.e. to selected collaboration partners within the limits of the legislation for providing the service.

We use services of external service providers for, e.g., maintaining customer and co-operation partner information. In accordance with data protection agreements, each service provider can only process personal data to the extent that is necessary for the provision of the service in question.

Personal data is not transferred to countries outside the EU or EEA.

6 How your personal information is protected and how long we process information

We apply physical, technical, and administrative protection measures to protect personal data. Only those parties who have the right to process personal data for their work performance are authorized to use the systems containing data. We make data processing agreements with all subcontractors that process personal data in order to ensure appropriate data protection.

We store personal data for as long as it is necessary due to the purpose of use (e.g. customer/co-operation relationship), or as long as the individual requests the erasure of the data. In this case we will store the data that legislation obligates us to store and the data about the erasure. We assess the necessity of retaining data

regularly. In addition, we take care of such reasonable measures which ensure that no incompatible, outdated or inaccurate personal data, taking into account the purpose of the processing, are stored in our registers.

7 Your rights as a data subject

Right of access, rectification and erasure

As a data subject you are entitled to obtain information of your personal data processed by KHW. You have also a right to inspect the personal data concerning yourself, which is stored in the register, and a right to require rectification or erasure of your data.

Direct marketing prohibition and right to restrict the processing

You have the right to object or to demand restriction of the processing and prohibit the direct marketing.

Withdrawal of a consent

When the processing of information is subject to your consent, you may withdraw your consent at any time. Withdrawing your consent does not affect the lawfulness of processing before the withdrawal of the consent. Withdrawals can be made by requesting withdrawal from privacy-khw@k-hartwall.com.

Right to lodge a complaint with a supervisory authority

If you consider that the processing of personal data relating to you infringes the data protection regulation, you have the right to lodge a complaint with a supervisory authority. You may lodge your complaint in the EU Member State of your habitual residence, place of work or place of the alleged infringement.

Other rights

You may also request the personal data collected based on your consent and concerning you to be transmitted to another controller in a case where the data is in machine-readable and transferable format.

8 Whom can you contact?

If you have any questions related to the personal data processing or you want to exercise your abovementioned rights, please contact privacy-khw@k-hartwall.com.