

PRIVACY STATEMENT FOR CUSTOMERS AND STAKEHOLDERS

1. DATA CONTROLLER

Tamro Corporation (0533965-2), Rajatorpantie 41 B, FI-01641 Vantaa, Finland

2. CONTACT PERSON FOR MATTERS CONCERNING DATA FILES

Tamro Legal, Lotta Väisänen, switchboard +358 20 44511

3. NAME OF THE DATA FILE

Tamro's customer and stakeholder file

4. THE PURPOSE AND BASIS FOR PROCESSING PERSONAL DATA

The primary basis for processing personal data is a customer relationship between the customer and Tamro, the customer's consent, an assignment given by the customer, or other pertinent connection, such as implementing an agreement with a company represented by the customer.

Personal data can be processed for the following purposes:

Management, implementation, development and monitoring of the customer relationship, customer service and the related communication and marketing.

Analysis, grouping and reporting of customer relationships and other purposes related to the development of the overall customer account and Tamro's business.

Collecting and handling customer feedback and customer satisfaction information.

Implementing market surveys and opinion polls.

Recording calls to the customer service centre to verify service events, ensure legal protection and safety, and train customer service personnel and develop the quality of customer service.

5. INFORMATION CONTENT OF THE DATA FILE

The information that can be stored for a data subject includes the following:

Name, the name normally used, personal identity number, customer number, sex, language, address, telephone number, e-mail address and other relevant contact details.

Information on service use and purchases, as well as information on marketing and communication that have taken place through different channels, such as online services and automated services, including the recording of calls to the customer service centre.

Content produced by the data subject, such as customer feedback, and additional information provided by the data subject, such as wishes related to the customer relationship, customer satisfaction information, interests and other similar information.

Other information related to the customer relationship, including information collected about the use of websites that can be connected to the customer, such as the user's IP address, time of visit, the pages visited, the type of browser used (e.g., Internet Explorer or Firefox), the network address from which the user moved to the website, and the server from which the user accessed the website.

Necessary information related to the use of identification and verification tools and services.

Information related to the processing of data, such as the date of recording the data and the source of the data.

6. PERSONAL DATA RETENTION PERIOD

Tamro will store personal data for as long as is necessary based on the management of a contractual or customer relationship or the requirements of the authorities.

7. REGULAR SOURCES OF DATA

The data is primarily obtained from the following sources:

The data subjects themselves and events related to their customer relationship, service use, communication and business.

Parties providing identification, verification, address, update and credit information services and other similar services.

8. REGULAR DISCLOSURE OF THE DATA AND TRANSFERRING THE DATA OUTSIDE THE EUROPEAN UNION OR THE EUROPEAN ECONOMIC AREA

The data is disclosed to Tamro's group companies for the purposes described in section 4 of this privacy statement and to potential other Tamro's personal data files, while always observing privacy legislation and acting within the limits imposed therein.

The data is disclosed to Tamro's selected business partners in accordance with the purpose described in this privacy statement.

The data is not disclosed to anyone outside Tamro or parties participating in the production, development or maintenance of services and communication on behalf of Tamro, except by agreement, a separate consent and/or specific regulations.

The information is not regularly transferred outside the EU or the European Economic Area. However, Tamro has outsourced some of its IT services to outside service providers on whose servers the personal data are stored. In cases where Tamro's outside service providers use subcontractors which are located outside the EU or the European Economic Area, Tamro makes sure that the personal data in question is protected according to the privacy legislation in force from time to time by using the EU Commission model clauses or by ensuring the data importer belongs to the Privacy Shield system.

9. DESCRIPTION OF THE PRINCIPLES OF PROTECTING THE DATA FILE

Any manually handled material is stored in a locked room that can only be accessed by persons with a specific authorization. Digital material can only be accessed with the personal user ID and password of an authorized employee, contractor or business partner. There are several levels of access rights, and each user is given an access right that is sufficient for their task, while being as limited as possible.

10. RIGHTS OF THE DATA SUBJECT CONCERNING THE PROCESSING OF PERSONAL DATA

The data subject's right to access the data (inspection right)

The data subject is entitled to inspect which data concerning the data subject has been recorded in Tamro's customer data file. The inspection request shall be made in accordance with section 11 of this privacy statement. The inspection right can be denied on grounds specified in the legislation. As a rule, exercising of the inspection right is free of charge.

The data subject's right to demand the rectification or erasure of data or the restriction of its use

The data subject can make a request to rectify their data in accordance with section 11 of this privacy statement.

The data subject also has the right to demand the data controller to restrict the processing of the data subject's personal data, for instance, in a situation where the data subject is waiting for Tamro's response to a request to rectify or erase their data.

The data subject's right to transfer the data from one system to another

To the extent that the data subject has provided data to the customer data file to be processed based on the data subject's consent or assignment, the data subject has the right to obtain such data for their personal use, primarily in machine-readable format, as well as to transfer the data to another data controller.

The data subject's right to lodge a complaint to the supervising authority

The data subject is entitled to lodge a complaint to the competent supervising authority if the data controller has not observed the applicable privacy regulations in its actions.

Other rights

If personal data is processed based on the consent of the data subject, the data subject has the right to withdraw their consent by notifying Tamro of this in accordance with section 11 of this privacy statement.

The data subject can issue consents or prohibitions concerning direct marketing to Tamro.

11. CONTACTS

In all questions related to the processing of personal data and in situations related to the exercising of one's rights, the data subject shall contact Tamro by sending an e-mail to the address asiakaspalvelu@tamro.com, at Tamro's office or by post, using the address Tamro Corporation / Data Protection Officer, Rajatorpantie 41 B, FI-01641 Vantaa, Finland. If necessary, Tamro may request the data subject to further clarify their request in writing, and the identity of the data subject may be verified before taking any other action.