

KALLIOLAW MARKETING PRIVACY POLICY

This privacy policy has been latest updated on 28 February 2020

1 CONTROLLER

Kalliolaw Attorneys Ltd (Business ID 1621379-9) ("**Kalliolaw**")

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2 PERSON RESPONSIBLE FOR PERSONAL DATA MATTERS

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3 PURPOSE OF POLICY

3.1 This policy describes how Kalliolaw processes personal data for **marketing purposes**.

3.2 This policy does not apply to processing of personal data in connection with assignment contracts.

3.3 This policy applies to persons who are in a contractual relationship (for example, in an employment relationship) with the entity (for example, a limited liability company) to which Kalliolaw directs marketing activities (such as e-mails). "**Person**" refers to all these persons whose personal data is processed.

3.4 Providing personal data to Kalliolaw for Kalliolaw's marketing activities is voluntary.

4 PURPOSES AND LEGAL BASIS FOR PROCESSING

4.1 Purposes for processing of personal data:

- (a) to provide information on Kalliolaw's services and to send newsletters and similar bulletins;
- (b) marketing of Kalliolaw's services to the person's organisation in the person's work role or office; and
- (c) development of Kalliolaw's services, based on e.g. responses to customer satisfaction surveys.

4.2 Legal basis for processing of personal data:

Kalliolaw has a legitimate interest for the processing of personal data. According to the interest assessment performed by Kalliolaw, the persons' interests or fundamental rights and freedoms do not override Kalliolaw's legitimate interests. Where the law requires that consent from the person is obtained in order to proceed with marketing, bulletins or newsletters, the legal basis for processing is consent.

5 CONTENTS OF THE REGISTER

The register contains the following personal data:

- (a) name;
- (b) phone number;
- (c) email address;

- (d) business address;
- (e) title or position;
- (f) employer or other similar organization; and
- (g) possible comments regarding Kalliolaw or Kalliolaw's services.

6 SOURCES OF PERSONAL DATA

The sources of personal data are:

- (a) the persons themselves; or
- (b) Suomen Asiakastieto Oy and other sources of marketing data.

7 TRANSFERS OF PERSONAL DATA

7.1 Personal data may be transferred to the following parties:

- (a) to the Finnish Bar Association in connection with their supervision or other of their tasks, to extent required by the Finnish Bar Association's rules or the Advocates Act.
- (b) Personal data is not otherwise transferred to any third parties for their own processing purposes.

7.2 Personal data may be transferred to the following parties, who provide systems and ICT support services to Kalliolaw ("Service Provider" or "Service Providers")

- (a) ICT, customer relationship management system (CRM) and enterprise resource planning system (ERP) suppliers, suppliers of customer survey systems, newsletter systems and other mailing systems, and suppliers of other similar support services, and subcontractors of all these suppliers. These suppliers process personal data only in order to provide services and systems to Kalliolaw. They do not process the personal data for other purposes.

8 TRANSFERS OF PERSONAL DATA TO THIRD COUNTRIES

- 8.1 Kalliolaw does not itself transfer personal data to countries outside the European Economic Area ("**EEA**") or the European Union ("**EU**"), unless authorized to do so under applicable laws or unless consented to or instructed by the person or the customer.
- 8.2 The Service Providers meant in sub-section 7.2 and their subcontractors may transfer and process personal data also outside the EEA and the EU. In its contracts with the Service Providers, Kalliolaw requires the Service Providers to ensure that there are legal grounds for the transfer.
- 8.3 Kalliolaw has a branch in the United Kingdom ("**UK**"). The UK branch is part of Kalliolaw and Kalliolaw has the same liability for both the UK branch and the operations in Finland. Kalliolaw may continue to process the personal data in the UK even after the UK ceased to be a member of the EU.

9 RETENTION TIMES OF PERSONAL DATA

- 9.1 Personal data contained in direct marketing lists is processed for the duration of the marketing activity (for example, for the duration of sending marketing e-mails or for the duration of other types of marketing contacts), and for a maximum of three years after the first marketing contact. The reason for the retention is that a typical marketing cycle is of this length, and Kalliolaw wants to ensure that marketing attempts are not repeatedly made to the same recipients. The entity targeted by the marketing activities may even be undergoing a process to replace its service provider

or undergoing corporate reorganization, due to which marketing activities are undertaken and personal data is processed. Personal data contained in newsletter and bulletin mailing lists is processed until the person asks to be removed from the list.

9.2 Personal data is deleted where required by mandatory law.

10 RIGHT OF ACCESS TO PERSONAL DATA

10.1 The person has the right to request and obtain information on what personal data concerning the person is processed by Kalliolaw or that no personal data is being processed.

10.2 Where such personal data is being processed by Kalliolaw, Kalliolaw shall provide the person with a copy of the personal data and the following information:

- (a) the purposes of the processing;
- (b) the categories of personal data concerned;
- (c) the recipients or categories of recipients to whom the personal data is to be or has been disclosed;
- (d) the period for which the personal data will be stored;
- (e) the existence of the right to request from Kalliolaw rectification or erasure of personal data concerning the person or to object to the processing of such personal data;
- (f) the right to lodge a complaint to the supervisory authority and the contact details of the supervisory authority;
- (g) communication of the personal data undergoing processing and of any available information as to its source; and
- (h) the significance and envisaged consequences of automated decision-making based solely on automated means.

10.3 For any further copies requested by the person, Kalliolaw may charge a reasonable fee based on administrative costs.

11 RIGHT TO DATA PORTABILITY

If Kalliolaw processes the person's personal data by automated means based on the person's consent or on a contract with the person, the person may request:

- (a) that Kalliolaw provides the person with the personal data which he or she has provided to Kalliolaw, in a structured, commonly used and machine-readable format; and
- (b) if technically feasible, that Kalliolaw transmits the personal data in the same format directly to another data controller.

12 RIGHT TO OBJECT TO PROCESSING

The person has the right to object, on grounds relating to their particular situation, to Kalliolaw processing personal data on the basis of either (i) the legitimate interests of Kalliolaw or (ii) protection of the person's vital interests. The person however does not have the right to object if Kalliolaw has compelling legitimate grounds which override the person's interests.

13 RIGHT TO RESTRICT PROCESSING

- 13.1 **'Restriction of processing'** means limiting the processing of stored personal data in the future.
- 13.2 At the person's request, Kalliolaw restricts processing in the following situations:
- (a) the accuracy of the personal data is contested by the person, in which case the processing is restricted for a period enabling Kalliolaw to verify the accuracy of the personal data;
 - (b) the processing is unlawful and the person opposes the erasure of the personal data and requests the restriction of its processing instead;
 - (c) Kalliolaw no longer needs the personal data for the purposes of the processing, but it is required by the person for the establishment, exercise or defence of legal claims; or
 - (d) the person has objected to processing, in which case the processing is restricted for the time during which it is verified whether Kalliolaw nevertheless has legitimate grounds for the processing.
- 13.3 In the situations listed above, Kalliolaw shall only process the personal data:
- (a) with the person's consent or for the establishment, exercise or defence of legal claims;
 - (b) for the protection of the rights of another natural or legal person;
 - (c) for reasons of important public interest of the EU or of an EU Member State; and/or
 - (d) to store the personal data.

14 RIGHT TO BE FORGOTTEN

- 14.1 The person has the right to request erasure of his or her personal data if one of the following grounds applies:
- (a) the personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
 - (b) the person withdraws consent on which the processing is based and where there is no other legal ground for the processing;
 - (c) the person objects to the processing in accordance with Section 12 and there are no overriding legitimate grounds for the processing;
 - (d) the personal data has been processed unlawfully; or
 - (e) the personal data has to be erased for compliance with a legal obligation in EU or EU Member State law to which Kalliolaw is subject.
- 14.2 However, Kalliolaw does not have to erase the personal data based on the grounds above to the extent Kalliolaw still needs to process the data:
- (a) in order to exercise the right of freedom of expression and information;
 - (b) for compliance with a legal obligation which requires processing by law to which Kalliolaw is subject or for the performance of a task carried out in the public interest;
 - (c) for reasons of public interest in the area of public health in accordance with legal requirements;

- (d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with legal requirements; or
- (e) for the establishment, exercise or defence of legal claims.

15 RECTIFICATION AND RIGHT TO LODGE COMPLAINT WITH SUPERVISORY AUTHORITY

- 15.1 At the person's request, Kalliolaw shall without undue delay correct, erase or supplement personal data if, taking into account the purpose of processing, the personal data is erroneous, unnecessary, incomplete or obsolete.
- 15.2 Should Kalliolaw decide not to take action in matters in sections 10-15.1 of this policy at the person's request, Kalliolaw will inform the person of this and of the reasons for not taking action without delay and at the latest within one month of receipt of the request. The person may then lodge a complaint with the supervisory authority.
- 15.3 If the person considers that the processing of personal data relating to him or her by Kalliolaw is unlawful, the person may lodge a complaint with a supervisory authority. The contact details of the Finnish supervisory authority are:

www.tietosuoja.fi

Office of the Data Protection Ombudsman

Postal address: P.O. Box 800, 00521 HELSINKI, FINLAND

Visiting Address: Ratapihantie 9, 00520 HELSINKI, FINLAND

Tel: +358 29 56 66700 (exchange)

Email: tietosuoja@om.fi

16 INFORMATION SECURITY

The personal data processed on Kalliolaw's equipment is secured e.g. by using the following methods:

- (a) Kalliolaw's own server computers are located in Finland.
- (b) Mechanical or electric locks at Kalliolaw's premises.
- (c) Electrical surveillance systems at Kalliolaw's premises.
- (d) Double firewall systems and anti-malware systems on Kalliolaw's ICT systems.
- (e) Kalliolaw sends electronically verified emails (digital signature).
- (f) Personal user rights that can be traced in Kalliolaw's ICT systems.
- (g) Limited number of superusers.
- (h) Professional knowledge and training of Kalliolaw's personnel.
- (i) The Finnish Bar Association's practices and instructions concerning the processing of customer data, processing of personal data, information security and confidentiality.

17 NO AUTOMATED DECISION-MAKING OR PROFILING

Kalliolaw does not use automated decision-making, such as profiling, in the processing of personal data.