

## PRIVACY POLICY

The purpose of this Privacy Policy ("**Privacy Policy**") is to provide you information required by the EU General Data Protection Regulation 2016/679 on how Ollberg Oy processes your personal data. Ollberg Oy is responsible for ensuring that your personal data is processed in compliance with this Policy and applicable data protection laws.

Your privacy is important to us, and we are committed to protecting your privacy and personal data in compliance with the applicable data privacy laws and regulations.

### 1. DATA CONTROLLER AND CONTACT DETAILS

Ollberg Oy

Business ID: 3218202-1

Address: Laivastokatu 4, 00160 Helsinki

Phone: +358 400842921

E-mail: info@ollberg.fi

### 2. COLLECTION AND PROCESSING OF YOUR DATA

This Privacy Policy applies to our website visitors, customers and partners who have a contractual relationship or other co-operation relationship with us. We collect your personal data directly from you, for example when you interact with us or use services offered by Ollberg Oy. We do not process more personal data than is necessary for the purposes for which it is collected.

#### *a. Website visitors*

When you visit our website [www.ollberg.fi](http://www.ollberg.fi), we may collect information through cookies or similar technologies. We use only necessary cookies which enables our systems to recognise your browser and tell us e.g. how, when and which pages in our site are visited and by how many people, and also allows us to identify a return visitor as a unique user. Cookies placed by the website cannot access, read or modify any other data on a computer. You will find more information concerning cookies further below in sections 4 and 5.

In the table below you can find the purposes of processing, the legal bases and the personal data we process.

Purpose of processing	Legal basis for processing	Categories of personal data
To enable basic functionalities, ensure certain security features, and optimise the website performance	Legitimate interest of the data controller	Data is collected by cookies and similar technologies placed on our website, and may include: <ul style="list-style-type: none"><li>• Website where your visit originates</li><li>• Browser and device type</li><li>• IP address</li><li>• Date, time and duration of the visit</li></ul>

To communicate with you (e.g. responding to contact requests made via our website)	<p>Legitimate interest of the data controller</p> <p>Consent of the data subject (prior to sending electronic direct marketing where applicable)</p>	<p>Contact information which may include:</p> <ul style="list-style-type: none"> <li>• Name, job title, company</li> <li>• Contact details such as email</li> </ul> <p>Personal data related to marketing activities which may include:</p> <ul style="list-style-type: none"> <li>• Information you provide to us when you contact us or attend meetings</li> </ul>
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#### ***b. Business customers and partners***

We process personal data of our business-to-business customers, potential customers and their contact persons as well as partners in order to maintain and develop customer relations. In the table below you can find the purposes for processing, the legal bases and the categories of personal data we process.

<b>Purpose for processing</b>	<b>Legal basis</b>	<b>Categories of personal data</b>
Providing Ollberg Oy's services	Performance of a contract	<ul style="list-style-type: none"> <li>• Information concerning B2B customers</li> <li>• Contact information</li> </ul>
Concluding contracts and processing transactions, including invoicing		
Managing customer relations and marketing related activities	Legitimate interest of the data controller	<ul style="list-style-type: none"> <li>• Information concerning B2B customers</li> <li>• Contact information</li> <li>• Marketing information</li> </ul>
Fulfilling other legal obligations and mandatory requirements such as accounting	Legal obligation of the data controller	<ul style="list-style-type: none"> <li>• Contact information</li> <li>• Information concerning B2B customers</li> </ul>

### **3. CATEGORIES AND SOURCES OF PERSONAL DATA**

See below for detailed descriptions of the personal data we collect and the sources of such personal data. Most of the data we process is collected directly from you and when you use Ollberg Oy's services. You may also refuse to not give the information asked, but please note that by limiting the information you provide us, we can only provide you limited services.

<b>Categories of personal data</b>	<b>Specific description of the personal data</b>
Contact information	Personal data is collected directly from the data subject or the organisation the data subject represents. This may include:

	<ul style="list-style-type: none"> <li>• Name</li> <li>• Personal/business address</li> <li>• Organisation</li> <li>• Job title</li> <li>• Telephone number</li> <li>• Email</li> </ul>
Information concerning B2B customers	<p>Personal data is collected directly from the data subject or the organisation the data subject represents. Additionally, data is generated during the customer relationship. This may include:</p> <ul style="list-style-type: none"> <li>• Information related to use of the services</li> <li>• Billing information, such as credit card details and billing address</li> <li>• Correspondence and other communication</li> </ul>
Marketing information	<p>Personal data is collected through contact forms and similar. This may include:</p> <ul style="list-style-type: none"> <li>• Contact information</li> <li>• Other information you provide to us when you contact us</li> </ul>
Data collected by cookies and similar technologies	<p>Personal data is collected by cookies and similar technologies placed on our website. This may include:</p> <ul style="list-style-type: none"> <li>• Internet protocol (IP) address</li> <li>• Browser type</li> <li>• Internet service provider</li> <li>• URLs of referring/exit pages</li> <li>• Operating system</li> <li>• Date/time stamp</li> <li>• Locale and language preferences</li> <li>• Identification numbers associated with your devices</li> <li>• Your mobile carrier</li> <li>• System configuration information</li> </ul>

#### 4. WHAT ARE COOKIES?

Cookies are small text files that will be placed on your device when you visit our website. Cookies can be generally categorised according to their duration, origin and purpose. We have categorised our cookies below in section "Cookies used at our website" and on the cookie banner.

- Duration: Cookies can be either session cookies or persistent cookies. Session cookies are stored on the device only for the duration of the use of a website and are deleted when the browser is closed. Persistent cookies are stored on the device for a specified time or until the user deletes them.

- **Provider:** First-party cookies are directly stored by the website that a user is visiting. Third-party cookies are created and set by domains that differ from the website a user is currently visiting. Third-party cookies are often used for advertising purposes.
- **Purpose:** Cookies can be categorised by their purposes to several sub-categories, inter alia, essential, functional, analytics, personalisation, social media and advertising cookies.

## 5. COOKIES USED AT OUR WEBSITE

Below are the cookies that we have currently at our website. In addition, you will find information on their purposes, expiration periods and providers.

### *a. Strictly necessary cookies (always on)*

Cookie Name	Provider	Purpose	Duration	Cookie Type
XSRF-TOKEN	First-party (ollberg.fi)	Used for security reasons	Session	Essential
hs	First-party (ollberg.fi)	Used for security reasons	Session	Essential
svSession	First-party (ollberg.fi)	Used in connection with user login	12 months	Essential
SSR-caching	First-party (ollberg.fi)	Used to indicate the system from which the site was rendered	1 minute	Essential
_wixCIDX	First-party (ollberg.fi)	Used for system monitoring/debugging	3 months	Essential
_wix_browser_sess	First-party (ollberg.fi)	Used for system monitoring/debugging	session	Essential
consent-policy	First-party (ollberg.fi)	Used for cookie banner parameters	12 months	Essential
smSession	First-party (ollberg.fi)	Used to identify logged in site members	Session	Essential
TS*	First-party (ollberg.fi)	Used for security and anti-fraud reasons	Session	Essential
bSession	First-party (ollberg.fi)	Used for system effectiveness measurement	30 minutes	Essential
fedops.logger.X	First-party (ollberg.fi)	Used for stability/effectiveness measurement	12 months	Essential
wixLanguage	First-party (ollberg.fi)	Used on multilingual websites to save user language preference	12 months	Functional

## 6. WHO CAN ACCESS YOUR DATA?

Ollberg Oy may disclose your personal data to the extent permitted and obligated by existing legislation.

Ollberg Oy may share your information with third-party service providers to provide you the services or to facilitate your use of our services. This means for example third-party vendors who provide the necessary software, storage, and other similar technology that are required to provide the services. The scope of the data disclosed to these third parties is limited to what each party needs to fulfil their duties. Such parties process personal data only to the extent necessary to provide the services requested by Ollberg Oy.

When submitting forms on our website we use a third-party software provider for automated data collection and processing purposes. They will not use your data for any purposes.

Some of our third-party providers may be located outside of the EU/EEA. We ensure that such transfers are subject to appropriate safeguards as required by data protection laws.

We may also transfer or disclose personal data to authorities, where required to do so by applicable laws, and to our auditors.

## 7. SECURITY OF PROCESSING OF PERSONAL DATA

Ollberg Oy implements commercially reasonable technical and organisational measures to protect your personal data against abuse and loss. We store such data in secure environments.

## 8. PERSONAL DATA RETENTION PERIODS

Your personal data will be retained only for as long as necessary to fulfil the purposes defined in this Privacy Policy.

Most of your personal data will be retained during the course of your business relationship with Ollberg Oy. Some personal data might be retained after your relationship with us has ended, if required or allowed by applicable laws; for example, applicable tax and accounting legislation requires us to keep some information for six years and in some cases even longer. When the retention of your personal data is no longer required by law or rights or obligations by either party, we will delete your personal data.

Personal data which is not necessary for the customer or other relationship will be deleted or anonymised as soon as possible after the collection of such personal data and at latest within 12 months.

## 9. YOUR RIGHTS AS A DATA SUBJECT

As a data subject, you have the following data protection rights:

- *Right to access your data:* You are entitled to access your personal data we hold about you by contacting us.
- *Right to rectification your data:* If there are changes to your personal data, or you notice that the data stored about you is no longer valid, you have the right to ask us to rectify or complete the data.

- *Right to have your data erased:* You are entitled to have your personal data erased under specific circumstances, such as where you have withdrawn your consent, where you object to processing based on legitimate interests and we have no overriding legitimate grounds or where personal data is unlawfully processed.
- *Right to data portability:* In certain situations, you have the right to receive all such personal data which you have provided in a structured, commonly used and machine-readable format, and also to require us to transmit it to another data controller where this is technically feasible.
- *Right to object:* In certain situations, you have the right to object to processing of your personal data, upon which the processing shall cease. You have the right on grounds relating to the particular situation, to object to the processing if the processing is based on a legitimate interest.
- *Right to restrict processing:* You have in some situations the right to limit the processing of your data to some purposes. This means that the data controller must refrain from using the data during the period for which the right applies. This right may be used e.g., if the data subject contests the lawfulness of the processing or the accuracy of the data, and the data controller is in a process of verifying the accuracy of the data.
- *Right to withdraw consent:* You have always right to withdraw your consent at any time to the processing of personal data.
- *Right to lodge a complaint with the supervisory authority:* If you feel that your personal data has not been processed lawfully, you can lodge a complaint with the local data protection authority.

## **10. CHANGES TO PRIVACY POLICY**

Ollberg Oy reserves the right to amend this Privacy Policy at any time.

This Privacy Policy was last updated on 4.12.2022.