

TAALERI ENERGIA LTD'S PRIVACY NOTICE

(updated on 27.6.2019)

Before we process your (see Section 2 below) personal data, we provide you with the information according to Articles 13 and 14 of the GDPR through this this Privacy Notice. We inform our personnel with similar notifications separately.

We have a unilateral right to modify this Privacy Notice. The modifications take effect immediately when we post the up to date version of our Privacy Notice to our website.

1) BASIC INFORMATION

Controller:

Taaleri Energia Oy (business ID: 2772984-6)
Kasarmikatu 21 B, 00130 Helsinki Finland
+358 46 714 7100, energia@taaleri.com

Data Protection Officer:

Maarit Hannula
+358 40 5384 101, maarit.hannula@taaleri.com

2) PERSONAL DATA PROCESSING ACTIVITIES

Purpose for processing	Legal basis for processing	Data subjects and personal data
(a) Customer relationships	Contract ⇒ to perform the contracts to which we are a party	Customers: (i) contact details, (ii) data related to our relationship, (iii) other data disclosed to us, (iv) investment data, (v) bank details
(b) Business partner relationships	Contract ⇒ to perform the contracts to which we are a party	Business partners and potential business partners: (i) contact details, (ii) data related to our relationship, (iii) other data disclosed to us, (iv) investment data, (v) bank details
(c) Project-specific stakeholder relationships	Contract ⇒ to perform the contracts to which we are a party	Project-specific stakeholders: (i) contact details, (ii) data related to our relationship, (iii) other data disclosed to us, (iv) investment data, (v) bank details, (vi) CV data
(d) Managing of investment locations with landowners	Contract ⇒ to perform the contracts to which we are a party	Land owners: (i) contact details, (ii) data related to our relationship, (iii) other data disclosed to us, (iv) investment data, (v) bank details, (vi) property ownership data

(e) Direct marketing	<p>Our legitimate interest</p> <p>⇒ to manage and develop our client relationships and further develop our business operations</p> <p>NB! You have a right to opt-out of direct marketing each time we provide marketing to you.</p>	<p>Customers and potential corporate customers: (i) contact details, (ii) data related to our relationship, (iii) other data disclosed to us</p>
(f) Event organizing	<p>Our legitimate interest</p> <p>⇒ to manage our events</p> <p>NB! You have a right forbid us from processing your personal data.</p>	<p>Attendees: (i) contact details, (ii) data related to our relationship, (iii) other data disclosed to us</p>
(g) Managing of contacts and social media	<p>Our legitimate interest</p> <p>⇒ to manage contacts made to us</p> <p>NB! You have a right forbid us from processing your personal data.</p>	<p>Contacts: (i) contact details, (ii) data related to our relationship, (iii) other data disclosed to us</p>
(h) Recruiting	<p>Our legitimate interest</p> <p>⇒ to manage our jobseekers and possibly employ them</p> <p>NB! You have a right forbid us from processing your personal data.</p>	<p>Jobseekers: (i) contact details, (ii) data related to our relationship, (iii) other data disclosed to us, (iv) passport data, (v) videos and pictures, (vi) bank details, (vii) CV data</p>
(i) Compliance with legal obligations	<p>Legal obligations</p> <p>⇒ to comply with several legal obligations, e.g. KYC and AML/CTF</p>	<p>Customers, business partners and potential business partners, project-specific stakeholders and land owners: (i) contact details, (ii) data related to our relationship, (iii) other data disclosed to us, (iv) data related to our legal obligations</p>
(j) Cookies	<p>Consent</p> <p>⇒ Consent based on Act on Electronic Communications Services (917/2014)</p>	<p>Visitors of our websites: IP addresses</p>

3) REGULAR SOURCES OF INFORMATION

Purpose for processing	Sources of information:
See purposes (a) – (d) and (i) above	(i) Data subjects themselves, (ii) Business partners, (iii) Public sources, such as the internet, postal services, Trade Register and population register
See purposes (e) – (h) above	Data subjects themselves
See purpose (j) above	Cookies

4) DATA TRANSFERS

We may transfer your personal data to third parties, as it is a normal course of doing business in a digitalized world. When personal data is transferred to third parties, we ensure that we conclude adequate personal data processing agreements and safeguards in relation to the data transfers.

Your personal data may be transferred within the Taaleri Group and to our business partners, data storage service providers and communications services providers, accounting and auditing services providers and relevant authorities.

We may transfer personal data outside the EU and the EEA. When doing so, we ensure adequate safeguards for the data transfer, such as standard contractual clauses and Privacy Shield arrangements.

5) PERIOD FOR WHICH THE PERSONAL DATA WILL BE STORED

Purpose for processing	Retention period
See purposes (a) – (d) above	Necessary data shall be retained for as long as the relevant relationships end.
See purpose (e) above	Necessary data shall be retained until you withdraw your consent, opt out of direct marketing or we have an impression that you no longer want to receive our direct marketing.
See purpose (f) above	Necessary data shall be retained for a period of two (2) years following the last time you attended our event.
See purpose (g) above	Necessary data shall be retained for a period two (2) years following the last time you were in contact with us. And for social media contacts the data shall be retained for as long as you delete your personal data from our social media pages
See purpose (h) above	Necessary data shall be retained for a period of four (4) months once we receive the relevant job application.
See purpose (i) above	Data shall be retained for as long as we have a legal obligation to hold on to that data.
See purpose (j) above	The retention period varies between each cookie.

However, we may retain necessary data of the data subjects for longer than is described above, where we are required to do so by law, it is necessary due to legal proceedings and it is necessary for any similar reason. We shall be careful not to apply this Section in vain.

We inspect the necessity of the personal data stored regularly and keep records of the inspections.

6) DATA SUBJECTS' RIGHTS

The data subject has a right to use all of the below mentioned rights.

The contacts concerning the rights shall be submitted to the contact details stated in Section 2. The rights of the data subject can be put into action only when the data subject has been satisfactorily identified.

Right	Description
Right to inspect	The data subject has the right to inspect what, if any, data the controller has stored of her/him.
Right to rectify and erasure	The data subject has a right to request the controller to rectify or erase the personal data concerning the data subject on the grounds provided by law.
Right to restriction of processing	The data subject can request the controller to restrict the processing of the personal data concerning the data subject on the grounds provided by law.
Right to data portability	The data subject shall have the right to receive the personal data concerning her/him, which he/she has provided to the controller, in a structured, commonly used and machine-readable format where the processing is based on consent or a contract.
Right to object	Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning her/him for such marketing. Where personal data are processed on the basis of the legitimate interests of the controller, the data subject shall have the right to object the processing of personal data concerning her/him for such purposes in accordance with the law.
Automated individual decision-making, including profiling	The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.
Right to withdraw consent	Where the legal basis for the processing of personal data is the consent of the data subject, the data subject shall have the right to withdraw her/his consent.

Data subject shall also have the right to lodge a complaint with a competent supervisory authority, if the data subject considers that the processing of personal data relating to her/him infringes data protection laws.

7) SECURITY OF PROCESSING

We use e.g. the following data security measures for protecting the personal data we are in charge of: (i) personal data access is limited; (ii) we protect data with anti-malware, antivirus and other such software; (iii) each category of data has been assigned with a responsible party; (iv) we use up-to-date and reliable systems and services to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services; (v) we use up-to-date and reliable systems and services to ensure the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident; and (vi) we regularly assess and evaluate our personal data processing activities.