

# Privacy Notice

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# TAALERI ENERGIA LTD'S PRIVACY NOTICE

With this Privacy Notice we provide you information on why and how we process your personal data in our business operations.

This Notice is applicable on Taaleri Energia Ltd and its subsidiaries, including Taaleri Energia Funds Management Ltd.

We process your personal data for the following purposes as a controller:

- a) Customer relationships
- b) Business partner relationships
- c) Project-specific stakeholder relationships
- d) Managing of investment locations with landowners
- e) Direct marketing
- f) Event organizing
- g) Communications (including social media)
- h) Recruiting
- i) KYC
- j) Cookies

## 1) Contact details of the controller and the DPO

The controller of your personal data is Taaleri Energia Ltd (business ID: 2772984-6), which is located at Kasarmikatu 21 B, 00130 Helsinki Finland.

Our acting data protection officer (DPO) is Pasi Erlin (tel. +358 40 057 1113 and email [pasi.erlin@taaleri.com](mailto:pasi.erlin@taaleri.com)).

In case you have any questions related to your personal data, please be in contact with our acting DPO.

## 2) Key terms

**Controller** means the party responsible for processing the personal data of the data subject.

**Data subject** is a term for a human being in accordance with data protection laws.

**KYC (Know Your Customer)** means verifying the identity of the customer, ascertaining the customer and his/her assets and backgrounds, as well as knowing and following the behavior that is characteristic to the customer.

**Legal basis for processing** means the legal ground on which the controller processes the data subject's personal data. The lawfulness of processing is described in Article 6 of the EU Data Protection Regulation.

**Personal data** means any information concerning the data subject or information by which the data subject can be identified.

**Privacy Notice** means a document drawn up in accordance with Articles 13 and 14 of the EU Data Protection Regulation through which the controller informs data subjects of the ways their personal data is processed.

**Purpose for processing** means the reason why the controller processes the data subject's personal data.

### **3) Why do we process your personal data?**

We process your personal data in accordance with the processing purposes listed below. In the sections you will find information on what personal data we process and for what legal basis we process your personal data.

#### **a) Customer relationships**

**Explanation:** Personal data is processed to conclude and carry out customer relationships.

**Category of data subjects:** Customers.

**Categories of personal data:** (i) Contact details, (ii) data related to our relationship, (iii) other data disclosed to us, (iv) investment data, (v) bank details.

**Legal basis for processing:** Performance of our contractual obligations with the customers.

#### **b) Business partner relationships**

**Explanation:** Personal data is processed to conclude and carry out business relationships.

**Category of data subjects:** Business partners (contact persons).

**Categories of personal data:** (i) Contact details, (ii) data related to our relationship, (iii) other data disclosed to us, (iv) investment data, (v) bank details.

**Legal basis for processing:** Performance of our contractual obligations with our business partners.

#### **c) Project-specific stakeholder relationships**

**Explanation:** Personal data is processed to carry out project-specific stakeholder relationships.

**Category of data subjects:** Project-specific stakeholders.

**Categories of personal data:** (i) Contact details, (ii) data related to our relationship, (iii) other data disclosed to us, (iv) investment data, (v) bank details, (vi) CV data.

**Legal basis for processing:** Performance of our contractual obligations with our stakeholders.

#### **d) Managing of investment locations with landowners**

**Explanation:** Personal data is processed to manage investment locations.

**Category of data subjects:** Landowners.

**Categories of personal data:** (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.

**Legal basis for processing:** Performance of our contractual obligations with landowners.

#### **e) Direct marketing**

**Explanation:** Personal data is processed to market our services.

**Category of data subjects:** Customers and potential corporate customers

**Categories of personal data:** (i) Contact details, (ii) data related to our relationship, (iii) other data disclosed to us.

**Legal basis for processing:** Our legitimate interests, as we need to market our services in order to carry out business. Our interests override the interests of our customers and potential customers since we carry out direct marketing in accordance with applicable laws.

*NB! You may have a right to object data processing for these purposes (see section concerning your rights).*

#### **f) Event organizing**

**Explanation:** Personal data is processed to be able to arrange events.

**Category of data subjects:** Attendees.

**Categories of personal data:** (i) Contact details, (ii) data related to our relationship, (iii) other data disclosed to us.

**Legal basis for processing:** Our legitimate interests, according to which we carry out our events. Our interests are in line with those of the attendees, as they expect us to process their data for event purposes.

*NB! You may have a right to object data processing for these purposes (see section concerning your rights).*

#### **g) Communications (including social media)**

**Explanation:** Personal data is processed to carry out communications.

**Category of data subjects:** People who contact us.

**Categories of personal data:** (i) Contact details, (ii) data related to our relationship, (iii) other data disclosed to us.

**Legal basis for processing:** Our legitimate interests, according to which we carry out our communications. Our interests are in line with those of the people who contact us, as they expect us to process their data for communications purposes.

*NB! You may have a right to object data processing for these purposes (see section concerning your rights).*

#### **h) Recruiting**

**Explanation:** Personal data is processed to carry out recruiting.

**Category of data subjects:** Job applicants.

**Categories of personal data:** (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.

**Legal basis for processing:** Our legitimate interests, according to which we carry out our recruiting. Our interests are in line with those of the job applicants, as they expect us to process their data for recruiting purposes.

*NB! You have a right to object data processing for these purposes (see section concerning your rights).*

#### **i) KYC**

**Explanation:** Personal data is processed to identify and know our customers.

**Category of data subjects:** Customers, business partners and potential business partners, project-specific stakeholders and landowners.

**Categories of personal data:** Personal data as required by law, such as personal identification numbers, purposes and methods of use of the service, ownership relationships, the quality and scope of the business of the customer and the customer's beneficial owner.

**Legal basis for processing:** Our statutory obligations under applicable anti-money laundering and counter terrorist financing legislation.

#### **j) Cookies**

**Explanation:** Personal data is processed in cookies of our websites.

**Category of data subjects:** People visiting our websites.

**Categories of personal data:** IP addresses.

**Legal basis for processing:** Consent based on the Act on Electronic Communications Services of Finland (917/2014).

Please have a look at our [Privacy procedures for online services](#) for more information about cookies used in our websites.

### **4) From where do we collect your personal data?**

We collect your personal data from different sources. The sources of information we use depend on our processing purposes.

#### **See purposes (a) – (d) and (i)**

We collect your personal data for these purposes from yourself, our business partners, authorities, and different public sources, such as the trade register.

#### **See purposes (e) – (h)**

We collect your personal data from yourself.

#### **See purpose (j) above**

Please have a look at our [Privacy procedures for online services](#) for more information about cookies used in our websites.

## 5) Do we transfer your personal data?

We may transfer personal data to third parties as a normal course of our business. When personal data is transferred to third parties, we ensure that the transfers are carried out in a secure way and in accordance with adequate data protection agreements.

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.

We may also transfer personal data outside the EU and the EEA. When doing so, we ensure an adequate level of data protection, e.g., by using standard contractual clauses issued by the European Commission, and other similar arrangements.

## 6) How long do we retain your personal data?

The retention period of your personal data depends on the purposes for which we process your personal data. We inspect the necessity of the personal data stored regularly and keep records of the inspections.

### See purposes (a) – (d)

Necessary data shall be retained for as long as the relevant relationships are in force.

### See purpose (e)

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)

Necessary data shall be retained for a period of two (2) years following the last time you attended our event.

### See purpose (g)

Necessary data shall be retained for a period two (2) years following the last time you were in contact with us. Regarding social media contacts, the data shall be retained until you delete your personal data from our social media pages.

### See purpose (h)

Necessary data shall be retained for a period of four (4) months once we receive the relevant job application.

### See purpose (i)

Data shall be retained for as long as we have a legal obligation to hold on to that data.

### See purpose (j)

The retention period varies between each cookie.

## 7) What data protection rights do you have?

You may have the right to use the below listed data protection rights. The contacts concerning the rights shall be submitted to the controller's contact person. Your rights can be put into action only when you have been satisfactorily identified.

You may also have a right to lodge a complaint to the supervisory authority, if you think that the processing of your personal data infringes the data protection laws.

### **Right to inspect**

The data subject has a right to inspect what data the controller has stored of him/her.

### **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 a right to receive the personal data concerning him/her, which he/she has provided to the controller, in a structured, commonly used and machine-readable format where the processing is performed automatically and 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 him/her 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 him/her for such purposes in accordance with the law.

### **Automated individual decision-making, including profiling**

The data subject shall have a right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him/her or similarly significantly affects him/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 his/her consent.

## **8) Can this privacy notice be amended?**

We may unilaterally amend this privacy notice. We update the privacy notice as necessary, for example, when there is a change in legislation. Amendments to this privacy notice will take effect immediately when we post an updated version on our website.

If we make significant changes to the privacy notice, or if there is a significant change in the way it is used, we will notify the data subjects.