

## DATA PROTECTION STATEMENT

Effective date: 9 March 2021

<b>Data Controller:</b>	Legentum Oy, Business ID 2165980-8 ("Legentum") Address: P.O. Box 22, 01801 Klaukkala, Finland
<b>Contact Person in Data File Related Matters:</b>	Erkka Pälä firstname.lastname(at)legentum.fi Mailing address as above.
<b>Data File:</b>	Business Contact Data File
<b>Data Subjects:</b>	Employees and other similar representatives of actual and prospect customer companies ("Customers") of Legentum.
<b>Legal Basis for the Processing and Purpose of Use of Business Contact Data:</b>	<p>Processing of personal data ("Business Contact Data") is based on:</p> <ol style="list-style-type: none"><li>1) Legentum's legitimate interests as processing of Business Contact Data is an obligatory enabler for conducting business activities of Legentum in compliance with any applicable laws; and/or</li><li>2) Contractual relationships either directly with the data subjects or indirectly with the Customers that the data subjects represent.</li></ol> <p>The purposes for processing and use of the Business Contact Data are the following:</p> <ol style="list-style-type: none"><li>1) Marketing, sales, production and provisioning of services and products;</li><li>2) Managing relationships with Customers and business contact persons;</li><li>3) Development of services and products;</li><li>4) Reporting;</li><li>5) Development of IT environment and applications;</li><li>6) Invoicing, taxation and other necessary financial transactions;</li><li>7) Collecting and processing feedback from the Customers and business contact persons; and</li><li>8) Securing compliance with all applicable laws as well as establishing and exercising Legentum's legal rights (including claims) and defending Legentum against legal claims.</li></ol>
<b>Business Contact Data Content (Data Attributes and Information):</b>	Identification and general contact data attributes such as:  - Name;

	<ul style="list-style-type: none"> <li>- Mailing address;</li> <li>- Email address; and</li> <li>- Telephone numbers.</li> </ul> <p>Information related to Customers such as:</p> <ul style="list-style-type: none"> <li>- Customer name;</li> <li>- Position and/or title within Customer.</li> </ul> <p>Information necessary for invoicing and execution of other financial transactions related to Customers and business contact persons;</p> <p>Information and correspondence related to business transactions and activities between Legentum and Customer into which the business contact person has participated to or is otherwise related to.</p> <p>Information concerning business feedback and expectations of Customers and business contact persons towards Legentum.</p>
<p><b>Sources of Business Contact Data:</b></p>	<p>Business contact persons themselves, Customers and other representatives of them, Legentum's own employees and external resources supporting Legentum's business processes (<i>e.g.</i> service providers).</p>
<p><b>Disclosures and Transfers of Business Contact Data and Transfer of Business Contact Data to countries outside European Union or the European Economic Area:</b></p>	<p>Business Contact Data are not generally disclosed (to another controller for independent use) unless required by the mandatory law such as to authorities.</p> <p>If Business Contact Data is transferred to/from external data processors (subcontractors or vendors) to be processed on behalf of Legentum, appropriate data processing agreements, as required by the applicable laws, are executed to secure lawful and appropriate processing of Business Contact Data.</p> <p>Exceptionally, Business Contact Data may need to be transferred to purchaser or potential purchaser of Legentum business or part of it. Such sharing does not occur regularly. If it becomes necessary, only the smallest possible amount of Business Contact Data will be transferred in the limits of applicable legislation.</p> <p>Business Contact Data is not transferred outside EU and/or EEA (incl. Switzerland).</p>
<p><b>Security Principles of the Data File:</b></p>	<p>Business Contact Data is protected by organisational and technical measures against accidental or unlawful access, alteration, and destruction or other processing including unauthorized disclosure and transfers.</p>

	<p>The security measures include (but are not limited to) proper firewall arrangements, malware detection, appropriate encryption of telecommunication and correspondence as well as use of secure and monitored equipment. Data security is of special concern when third parties (<i>e.g.</i> data processing subcontractors) providing and implementing IT systems and services on behalf of Legentum are retained.</p> <p>Data security requirements are duly observed in IT system access management and monitoring of access to IT systems.</p>
<p><b>Right to Object Processing of Business Contact Data</b></p>	<p>In accordance with the law the data subject has at any time the right to object the processing of Business Contact Data:</p> <ol style="list-style-type: none"> <li>1) On the grounds of the lawfulness of Legentum data processing being based on Legentum legitimate interests; and</li> <li>2) For direct marketing purposes (unsubscribe from the Legentum direct marketing).</li> </ol> <p>In order to use these rights, the data subject must contact the above-mentioned contact person in writing (incl. e-mail). However, the data subject request may be declined or restricted where allowed or required under the law.</p>
<p><b>Other Rights of Data Subject:</b></p>	<p>In accordance with the law the data subject has at any time the right to:</p> <ol style="list-style-type: none"> <li>1) Access the Business Contact Data and based on request, receive a copy of it and related other supplementary information concerning Business Contact Data processing as specified in the law;</li> <li>2) Request, purposes of Business Contact Data processing allowing: <ol style="list-style-type: none"> <li>a. Erroneous Business Contact Data to be corrected;</li> <li>b. Incomplete Business Contact Data to be amended; and</li> <li>c. Obsolete or expired Business Contact Data to be deleted;</li> </ol> </li> <li>3) Be forgotten by Legentum, if: <ol style="list-style-type: none"> <li>a. Business Contact Data are no more necessary in relation to the Legentum data processing purposes;</li> <li>b. The Business Contact Data have been unlawfully processed by Legentum;</li> <li>c. The data subject withdraws consent based on which the processing of Business Contact Data occurs and where there is no other legal ground for such processing;</li> <li>d. The processing has been based solely on legitimate interests of Legentum which the data subject has objected and no overriding legitimate grounds for the processing have been established; or</li> </ol> </li> </ol>

	<ul style="list-style-type: none"> <li>e. The data subject has objected processing for direct marketing (applicable only to such Business Contact Data that is used solely for direct marketing and for no other purpose).</li> </ul> <p>4) Restrict the processing of the Business Contact Data if:</p> <ul style="list-style-type: none"> <li>a. The data subject contests the accuracy of the Business Contact Data;</li> <li>b. The processing is unlawful, and the data subject opposes the removal of such Business Contact Data;</li> <li>c. The data subject has objected to processing of Business Contact Data on the sole lawful basis of Legentum legitimate interests and pending the investigation if the legitimate interests of Legentum override those of the data subject; or</li> <li>d. Legentum no longer needs the Business Contact Data for its purposes of uses, but Business Contact Data are required by the data subject for the establishment, exercise or defense of legal claims;</li> </ul> <p>5) Receive the Business Contact Data, which the data subject has provided to Legentum (but not other Business Contact Data including those that are generated by Legentum or provided by any third parties), in a structured, commonly used and machine-readable format and have the right to transmit those data to other data controller; or</p> <p>6) Lodge a complaint with a supervisory authority (in Finland Data Protection Ombudsman);</p> <p>In order to use the above-mentioned rights, the data subject shall contact the Legentum contact person in writing (incl. e-mail). However, the request may be declined or restricted where allowed or required under the law.</p>
<p><b>Retention period of Business Contact Data:</b></p>	<p>Generally, Legentum retains the Business Contact Data for ten years from the last business activity completed between Legentum and business contact person.</p> <p>The general personal data retention rule is based on i.a. laws regulating expiration of debts, possible long warranty periods related to Legentum services and products as well as typically long-lasting nature of business relationships between Legentum and Customers. Also, possible needs related to litigation purposes justify the described retention of the Business Contact Data.</p> <p>However, the above retention rule is always subject to differing requirements included in any mandatory laws applicable to Business Contact Data. Therefore, in some situations, retention period may be shorter or longer than the above-described.</p> <p>Notwithstanding anything above, the retention period of Business Contact Data may always be extended due to existing or imminent need of Legentum to establish or exercise legal claims or defend</p>

	itself against legal claims related in any manner to Business Contact Data.
<b>Provision of Business Contact Data:</b>	<p>Provision of Business Contact Data is not obligatory, but it is necessary to commit to and proceed with any business activity between Legentum and business contact person and/or Customer.</p> <p>Failing to provide Business Contact Data prevents or may prevent Legentum from committing to an/or proceeding the mentioned business activity.</p>