

## VAASAN SÄHKÖ PRIVACY POLICY

### 1. Background information on the processing of personal data

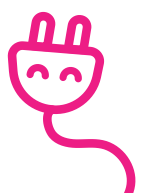
This privacy policy (hereinafter “the Privacy Policy”) provides information on how Vaasan Sähkö Oy (“Vaasan Sähkö” or “the Company”) processes personal data in accordance with the European Union’s General Data Protection Regulation (2016/679) (“the GDPR”). Personal data is any information relating to an identified or identifiable natural person, i.e. the data subject.

In this Privacy Policy, “data subject” or “you/your” refers to either a) a customer or customer representative of Vaasan Sähkö, b) a potential future customer of Vaasan Sähkö or any other person who contacts the Company regarding Vaasan Sähkö’s products or services or, for example, reports a fault related to them (each potential customer), or c) a representative of a partner of Vaasan Sähkö (such as a contractor or subcontractor).

Vaasan Sähkö processes the personal data of data subjects in accordance with the Privacy Policy, the GDPR, and other applicable legislation. The company has the right to make changes to the Privacy Policy if the processing of personal data changes, for example due to changes in the services provided by Vaasan Sähkö or changes in legislation. If it is updated, Vaasan Sähkö will publish the new Privacy Policy on its website.

If you use Vaasan Sähkö’s website, Vaasan Sähkö may use cookies or other similar technologies to collect information related to your use of the website or your terminal device. For information about the cookies used on Vaasan Sähkö’s website, please see the cookie notice.

In addition to the processing described in this Privacy Policy, Vaasan Sähkö, as the data controller, processes personal data for purposes such as access and camera surveillance of its premises, visitor practices and HR purposes (processing of personal data of employees and job applicants). For more information about the processing of your personal data in the situations described above, please email us at [tietosuoja@vaasansahko.fi](mailto:tietosuoja@vaasansahko.fi).

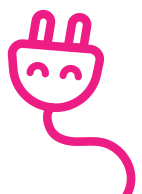


## 2. Content of the Privacy Policy

The Privacy Policy consists of the following sections.

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3. KUKA VASTAA HENKILÖTIETOJESI KÄSITTELYSTÄ? .....ERROR! BOOKMARK NOT DEFINED.
4. MIHIN TARKOITUKSIIN JA MILLÄ PERUSTEELLA VAASAN SÄHKÖ KÄSITTELEE HENKILÖTIETOJASI? ERROR! BOOKMARK NOT DEFINED.
5. KÄSITTELEEKÖ VAASAN SÄHKÖ HENKILÖTIETOJASI OIKEUTETUN EDUN PERUSTEELLA?ERROR! BOOKMARK NOT DEFINED.
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### 3. Who is responsible for processing your personal data?

Vaasan Sähkö is the controller of the personal data of its customers and their representatives, potential customers, landowners and partners. This Privacy Policy describes the processing of personal data in these situations.

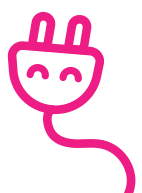
To the extent that Vaasan Sähkö processes your personal data on behalf of another party, for example when providing customer service-related services for another party, the controller of your personal data is not Vaasan Sähkö but the other party. The processing is then described in the privacy policy of the other controller.

Vaasan Sähkö's contact details are:

Vaasan Sähkö Oy  
Address: Kirkkopuistikko 0, 65000 Vaasa  
Business ID: 0209628-8

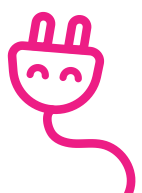
The data protection officer responsible for the processing of your personal data at Vaasan Sähkö is:

Data protection officer  
Email: [tietosuoja@vaasansahko.fi](mailto:tietosuoja@vaasansahko.fi)



#### 4. For what purposes and on what basis does Vaasan Sähkö process personal data?

PROCESSING OF CUSTOMERS' PERSONAL DATA		
Personal data processed	Purpose of processing	Grounds for processing
<ul style="list-style-type: none"> <li>Basic information about the customer, including (but not necessarily limited to) their name, date of birth, personal identity code, business ID, customer number, location number, native language and nationality;</li> <li>Information about Vaasan Sähkö's contact persons, such as employer information and professional status;</li> <li>Contact information, including address, telephone number and email address;</li> <li>Payment and billing information, such as billing, payment, payment and debt collection information, estimates, standard compensation and claims information, and information related to financial status;</li> <li>Information related to customer relationships and contracts, such as information about the contract, subscription, existing and terminated services, transaction information, call records, correspondence with Vaasan Sähkö, and other contact-related and marketing-related information;</li> <li>Information related to services and products, such as subscription, period of validity, changes and termination, information related to disruptions, necessary information regarding the use of online and mobile services, information about interests disclosed by the customer, cookies and information related to their use; and</li> <li>Any other data processed with the customer's consent.</li> </ul>	<ul style="list-style-type: none"> <li>Managing customer relationships and tasks related to Vaasan Sähkö's business activities;</li> <li>Offering Vaasan Sähkö's services and products, and related communication; and</li> <li>Investigating any suspected abuses.</li> </ul>	<ul style="list-style-type: none"> <li>Implementation of the agreement between Vaasan Sähkö and the customer</li> <li>Vaasan Sähkö's legitimate interest based on the performance of the contract between Vaasan Sähkö and the customer</li> <li>Compliance with Vaasan Sähkö's statutory obligations</li> <li>Customer consent (if consent has been requested and given)</li> <li>To the limited extent that Vaasan Sähkö processes sensitive personal data belonging to the customer, the processing is necessary under the law.</li> </ul>
PROCESSING OF PERSONAL DATA OF POTENTIAL CUSTOMERS		
Personal data processed	Purpose of processing	Grounds for processing
<ul style="list-style-type: none"> <li>Basic information about the potential customer, such as name, date of birth, personal identity code, business ID, customer number, location number, native language and nationality;</li> </ul>	<ul style="list-style-type: none"> <li>Offering of Vaasan Sähkö's products and services and related communication</li> </ul>	<ul style="list-style-type: none"> <li>Pre-contractual measures between Vaasan Sähkö and the potential customer</li> </ul>

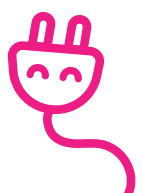


<ul style="list-style-type: none"> <li>Information about Vaasan Sähkö's contact persons, such as employer information and professional status;</li> <li>Contact information, including address, telephone number and email address;</li> <li>Information related to potential customer relationships and contracts, such as information about the contract, subscription, existing and terminated services, transaction information, call records, correspondence with Vaasan Sähkö, other contacts and marketing information; and</li> <li>Any other data processed with the potential customer's consent.</li> </ul>		<ul style="list-style-type: none"> <li>Compliance with Vaasan Sähkö's statutory obligations</li> <li>Consent of the potential customer (if consent has been requested and given)</li> </ul>
PROCESSING OF PERSONAL DATA OF REPRESENTATIVES OF PARTNERS		
Personal data processed	Purpose of processing	Grounds for processing
<ul style="list-style-type: none"> <li>Basic details such as name, date of birth and native language;</li> <li>Personal identity code or business ID (in case of electronic identification)</li> <li>Information about the employment relationship, such as employer details and professional status;</li> <li>Contact information, such as phone number and email address;</li> <li>Work planning, tasks and activities carried out;</li> <li>Qualifications and education; and</li> <li>Location data and any other data processed with the consent of the partner's representative.</li> </ul>	<ul style="list-style-type: none"> <li>Identifying the representative of the partner</li> <li>Coordination and monitoring of work tasks</li> </ul>	<ul style="list-style-type: none"> <li>Vaasan Sähkö's legitimate interest based on the performance of a contract between Vaasan Sähkö and a partner or the performance of a contract between Vaasan Sähkö and the customer</li> <li>Compliance with legal requirements</li> <li>Consent of the partner's representative (if consent has been requested and given)</li> </ul>

##### 5. Does Vaasan Sähkö process personal data on the basis of legitimate interest?

In addition to the purposes and grounds for processing set out in section 4, Vaasan Sähkö may process personal data on the basis of legitimate interests, in particular for the following purposes:

- Direct marketing and other commercial communications concerning the products or services of Vaasan Sähkö or of a company in its group, unless you have prohibited such direct marketing or communications
- Execution of the contract between Vaasan Sähkö and the customer when Vaasan Sähkö processes the personal data of Vaasan Sähkö's customer representative



- The implementation of Vaasan Sähkö's products and services or the execution of a contract between Vaasan Sähkö and a partner, when Vaasan Sähkö processes personal data of employees and representatives of partners involved in the provision of products and services.
- Ensuring, maintaining and developing the quality of Vaasan Sähkö's services, including by conducting customer satisfaction surveys
- Providing effective customer support, including recording calls to ensure quality of service and orders
- Preparing for disruptions and ensuring data security
- Maintaining and supporting the operation of the Vaasan Sähkö website, including adjusting its features to improve the user experience
- Statistical analysis and survey purposes
- Archiving and storage of documents

Vaasan Sähkö's internal reporting and statistics, as well as processing based on legitimate interest, is standard practice in Vaasan Sähkö's operations, and your interests or freedom or the protection of your personal data will not be unduly compromised by such processing.

## 6. Where does Vaasan Sähkö obtain personal data from?

Vaasan Sähkö obtains personal data from the following sources:

From the data subject themselves, in particular in the following contexts:

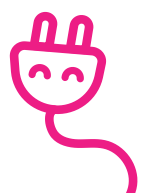
- When a customer or potential customer contacts Vaasan Sähkö;
- When a customer enters into a contract with Vaasan Sähkö;
- When a customer or their representative registers as a user of Vaasan Sähkö's services or products;
  - When a partner representative registers as a provider of Vaasan Sähkö's services;
  - When a customer uses Vaasan Sähkö's services; or
  - In the event of any other material connection between Vaasan Sähkö and the data subject.

From third parties, in particular (and to the extent permitted by law):

- From public information sources, such as the Finnish Trade Register;
- From the employer of the partner's representative;
- From public authorities;
- From Vaasan Sähkö group companies; and
- Other possible third parties, to the extent permitted by law.

## 7. To whom does Vaasan Sähkö transfer or disclose personal data?

In certain situations, the provision of Vaasan Sähkö's services to customers requires that the customer's personal data be shared with recipients outside Vaasan Sähkö, as described below. In the situations described



below, personal data will be transferred or disclosed in accordance with and only to the extent permitted by the applicable laws and official regulations and guidelines.

Vaasan Sähkö shares customers' personal data with Vaasan Sähkö's service providers to the extent necessary to provide Vaasan Sähkö's services and products. These service providers process personal data for or on behalf of Vaasan Sähkö as data processors. Service providers include, in particular, partners, IT system service providers, providers of billing and receivables management services, and service providers that offer Vaasan Sähkö services related to marketing, customer satisfaction surveys and communications, and coordination and monitoring of partner work activities.

Vaasan Sähkö discloses customers' personal data to recipients, who thereby become data controllers of that personal data. These recipients of personal data are the service providers responsible for debt collection on behalf of Vaasan Sähkö, and professional service providers such as Vaasan Sähkö's auditor and financial and legal advisors. Vaasan Sähkö may also disclose personal data for statistical and research purposes to universities and other research organizations, among other parties.

Vaasan Sähkö may also share personal data with Vaasan Sähkö's group companies on the basis of a legitimate interest and, among other things, process personal data in the group companies' common information systems and share it with potential investors or owners if Vaasan Sähkö's operations require this.

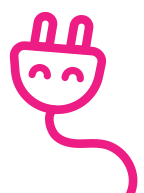
Vaasan Sähkö is also obliged to share customers' personal data with the authorities to the extent required by the services or products offered by Vaasan Sähkö, the investigation of possible suspected misuse, or legislation.

#### **8. Does Vaasan Sähkö transfer personal data to third countries?**

Vaasan Sähkö may transfer customers' personal data outside the territory of the member states of the European Union (EU) or the European Economic Area (EEA) if this is necessary for the purposes of the processing of personal data described above, or for the technical implementation of the processing. The level of data protection outside the EEA may be lower than within it. In such a situation, Vaasan Sähkö will apply appropriate safeguards to ensure the protection of customers' personal data, for example by applying the standard contractual clauses for the transfer of personal data to third countries set out in the modernized standard contractual clauses under the GDPR issued by the European Commission (available at [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en)).

#### **9. For how long does Vaasan Sähkö retain personal data?**

Vaasan Sähkö will retain customers' personal data for as long as is necessary for the purpose of processing it, such as for the performance of a customer agreement, partnership agreement or other agreement between Vaasan Sähkö and you or Vaasan Sähkö and a partner, or for the performance of the rights and obligations under such an agreement.



To comply with legal requirements and in case of possible liability for damages, the retention period of personal data is at least 10 years after the end of the contract. However, the company may be obliged to keep customers' personal data for longer than is necessary for the purposes of a particular processing operation, for example in the following situations:

- Legislation or government regulations or guidelines require the retention of personal data for a longer period (for example, because of legislation or government regulations or guidelines on accounting matters); or
- The retention of personal data is necessary to verify that Vaasan Sähkö has complied with its legal obligations, or to investigate, defend or respond to legal claims.

Vaasan Sähkö regularly assesses the retention periods for each type of personal data. When a customer's personal data is no longer needed, Vaasan Sähkö will delete it or make it non-identifiable as soon as possible. If you would like more information about the retention of your personal data for a specific purpose, you can email Vaasan Sähkö's data protection officer at tietosuoja@vaasansahko.fi.

#### 10. How does Vaasan Sähkö protect personal data?

Customers' personal data in electronic form is protected by generally accepted and reasonable technical means within Vaasan Sähkö's industry, such as firewalls and passwords. Materials containing customers' personal data other than in electronic form are located in locked premises to which unauthorized access is denied.

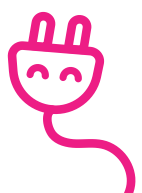
Only identified employees of Vaasan Sähkö or service providers acting on behalf of and for the account of Vaasan Sähkö have access to customers' personal data in accordance with the access rights granted by Vaasan Sähkö. For Vaasan Sähkö employees involved in the processing of customers' personal data, the Company holds regular training sessions to ensure the necessary expertise for the processing of personal data.

Vaasan Sähkö takes into account the applicable legislation and official regulations and guidelines and the guidelines of the industry associations to ensure the confidential processing of customers' personal data.

#### 11. What rights do you have regarding your personal data?

Customers have the rights listed below regarding the personal data processed by Vaasan Sähkö. The rights are not absolute, and there are exceptions and conditions for the exercise of each right provided for in the legislation and any regulations and instructions issued by the authorities. These are not described exhaustively below.

- **Right of access to your personal data:** Customers have the right to obtain confirmation as to whether Vaasan Sähkö is processing their personal data. If the company processes a customer's personal data, the customer also has the right to be informed, for example of the purposes for which their personal data is processed.





- **Right to rectification of personal data:** Customers have the right to request Vaasan Sähkö to correct imprecise or incorrect personal data.
- **Right to erasure of personal data:** Customers have the right to request Vaasan Sähkö to delete their personal data if, for example, it is no longer needed for the purposes for which it was collected or if the processing of the customer's personal data is unlawful.
- **The data subject's right to object to the processing of their personal data:** Customers always have the right to object to the processing of their personal data for direct marketing and other commercial communications. In addition, you have the right to object to the processing of your personal data based on legitimate interests on grounds relating to your particular situation, and unless Vaasan Sähkö can demonstrate an important and legitimate ground for such processing.
- **The right to withdraw consent:** If you have given your explicit consent to certain personal data processing, you can withdraw it at any time.
- **Right to restriction of processing:** You have the right to restrict the processing of your personal data while Vaasan Sähkö is investigating your request.
- **The right to transfer personal data between systems:** You have the right to receive the personal data you provide to the Company for your own use in a structured format.

You can exercise the rights described above by emailing Vaasan Sähkö's data protection officer at [tietosuoja@vaasansahko.fi](mailto:tietosuoja@vaasansahko.fi).

## 12. Who can I contact about processing of my personal data?

If you have any questions or comments about the processing of your personal data or about the Privacy Policy, or if you wish to exercise your rights, you can email Vaasan Sähkö's data protection officer at [tietosuoja@vaasansahko.fi](mailto:tietosuoja@vaasansahko.fi).

Vaasan Sähkö is legally obliged to confirm your identity before further processing your request. If you do not provide the necessary information and cannot be identified, Vaasan Sähkö has the right to refuse to process your request. Otherwise, Vaasan Sähkö will respond to your requests within the timeframe stipulated by law and in accordance with the law.

If you are not satisfied with the response given by Vaasan Sähkö or if you believe that Vaasan Sähkö is processing your personal data unlawfully, you can contact The Office of the Data Protection Ombudsman.

The Finnish version (private policy) is the original version. If there are interpretation or the text is unclear in this document compared to the original (in Finnish), the Finnish is considered valid.

