

PRIVACY STATEMENT ON THE MARKETING REGISTER

1. Controller

Lehto Tilat Oy (2034041-6)
Voimatie 6 B, 90440 KEMPELE, Finland (hereinafter referred to as the "Controller")

2. Contact person in matters concerning the register

Paolo Pisano
Väritehtaankatu 8, 01300 VANTAA, Finland. Tel: +358 20 320 000 tietosuoja@lehto.fi

3. Data included on the register

Our marketing register includes the following data about data subjects: name, email address, phone number, content of free-form chat discussions, and information about the types of project in which the data subject is interested in investing.

4. Purpose and legal basis for processing personal data

Customer data is processed in order to manage customer relationships and to realise targeted marketing communications to the data subjects on the Controller's Insiders register.

Processing is based on the Controller's justified benefit as a party seeking partners and marketing its projects. The Controller is entitled to market its sites in order to obtain investors for its projects.

5. Recipients of personal data

Personal data is processed by people employed by the Controller and authorised for sales duties in order to fulfil their own obligations based on their employment relationships. Personal data may also be processed within the Controller's parent company, Lehto Group Plc, for administrative reasons based on the Controller's justified benefit.

Data may be disclosed if necessary on the basis of final court judgments and orders by the authorities based on law.

6. Data sources

In principle, personal data is collected from the data subjects themselves in conjunction with registration as an Insider.

7. Personal data retention period

The retention period for personal data varies depending on the purpose of processing, and the data is only retained for as long as necessary in relation to the purpose for which it was collected. As regards people registered as Insiders, the retention period is two years after the data subject last showed any form of activity towards the Controller's services.

8. Data subject's right to object to personal data processing

Data subjects are always entitled to object to personal data processing related to direct marketing. Similarly, if the processing is based on the Controller's justified benefit, data subjects are entitled to object to personal data processing on grounds related to their specific personal circumstances.

9. Other rights of data subjects

a. Right to access personal data and right to correct data

Data subjects are entitled to receive a copy of the personal data about them or otherwise obtain access to their personal data without charge. Data subjects are entitled to demand that the Controller correct inaccurate and incorrect personal data about the data subject without undue delay.

b. Right to have data erased

Data subjects are entitled to have data about them erased from the register if the data is no longer needed for the original purposes, the data subject withdraws consent, and there is no other legal basis for processing or, if the data subject invokes the lack of a legal basis by way of objection, there are no justified grounds for processing.

c. Right to restrict processing

Data subjects are entitled to have data processing restricted only to data retention if the data is not correct; the processing is unlawful and the data subject does not want the data to be erased; the Controller no longer needs the data for processing purposes but the data subject needs it in order to prepare, bring or defend legal action; or the data subject has objected to personal data processing on grounds related to their specific personal circumstances in anticipation of verification of whether the Controller's justified benefit takes precedence over the data subject's grounds.

d. Right to transfer data

Data subjects are entitled to have the data about them transferred from one system to another in cases such as when the legal basis for processing was the data subject's consent or agreement and when the processing is conducted automatically.

e. Right to make a complaint to the supervisory authority

Data subjects are entitled to file complaints with the supervisory authority if they consider that regulations concerning data protection have not been complied with when personal data about them was processed. In Finland, the supervisory authority is the Data Protection Ombudsman (www.tietosuoja.fi). However, exercising this right shall not prejudice the data subject's other means of administrative appeal or legal remedy.

10. Fulfilment of information requests and other requests concerning data subjects' rights

Data subjects may send requests concerning exercising their rights as stated in Sections 8 and 9 above to tietosuoja@lehto.fi. The Controller may ask the data subject to specify its request in more detail in writing and it may verify the data subject's identity before handling the request. The Controller may refuse to fulfil a request on the grounds laid down in the General Data Protection Regulation.

11. Potential risks related to the rights and freedoms of data subjects and applicable information security procedures

The Controller is committed to processing and protecting personal data in accordance with valid legislation. The connection between the user's browser and the Controller's server is encrypted. The material for electronic processing is collected into databases, which are protected by firewalls, passwords and other technical measures, and access is restricted to the personnel whose duties require the use of these systems. A user ID and password are required in order to use the systems, and only the personnel authorised for this duty can access the processed personal data. System audits are performed regularly in order to ensure the continuity of information security.

12. Transfer of data outside the EU or the EEA

Data is not transferred outside the EU or the EEA.

13. Automatic decision-making

Data is not used for automatic decision-making.