

## PRIVACY STATEMENT

**EU General Data Protection Regulation (2016/679),  
Articles 12-14**

**Updated: 2025-03-04**

This Privacy Statement describes how Aidian Oy and its subsidiaries (hereinafter collectively referred to as "Aidian") process the personal data of their customers, partners or potential customers and partners. This statement applies when you use our products or services or otherwise interact with us. We may update or amend this Privacy Statement at any time and, where required by law, we will notify the data subjects.

<b>1. Data controller and/or joint controller</b>	Aidian Koivu-Mankkaan tie 6B 02200 Espoo Finland Tel. +358 10 309 300 Business ID: 1855216-1
<b>2. Contact person for the register</b>	This privacy statement applies to the joint customer and partner register of Aidian Oy and its subsidiaries. Aidian Oy is responsible for the technical maintenance of the register and acts as a central point of contact for data protection issues.  <b>Data Protection Officer:</b> Email: dataprotection@aidian.eu Phone: 010 309 3000 (center) Postal address: Aidian / Data Protection issues, Koivu-Mankkaan tie 6B, 02200 Espoo
<b>3. Name of the register</b>	Aidian's customer and marketing register
<b>4. Processing of personal data Purpose and legal basis</b>	<p>We process personal data in the register for the following purposes:</p> <ul style="list-style-type: none"> <li>• Managing the customer relationship and carrying out tasks related to the customer relationship (e.g. managing and fulfilling orders, invoicing, handling customer complaints and feedback),</li> <li>• Managing sales, marketing and communications (e.g. newsletter, bulletins), development, targeting, and monitoring.</li> <li>• Use of customer stories and images for marketing purposes.</li> <li>• Conducting and analyzing customer surveys.</li> <li>• Running campaigns, competitions, and raffles.</li> <li>• Customer relationship analysis, grouping, reporting and statistics.</li> <li>• Organizing events.</li> </ul> <p><b>Legal bases for processing personal data:</b></p> <ul style="list-style-type: none"> <li>• <b>Consent (GDPR Article 6(1)a)</b> <ul style="list-style-type: none"> <li>○ Electronic direct marketing under certain conditions.</li> <li>○ Organizing events.</li> </ul> </li> <li>• <b>Legitimate interest of the controller (GDPR Article 6(1)f)</b> <ul style="list-style-type: none"> <li>○ The processing is based on our legitimate interest in ensuring the continuity of our business, the execution of assignments and customer management. The proportionality of the processing in relation to the interests of the data subject has been verified on the basis of a balancing of interests.</li> <li>○ Managing the customer's contractual or customer relationship and maintaining the personal data of the persons involved.</li> <li>○ Management, development, targeting, and monitoring of sales and communications.</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>○ Management, development, targeting, and monitoring of electronic direct marketing under certain conditions.</li> <li>○ To carry out campaigns, competitions, and raffles.</li> <li>○ Customer relationship analysis, grouping, reporting and statistics</li> <li>• <b>Legal obligation of the controller (GDPR Article 6(1)c)</b> <ul style="list-style-type: none"> <li>○ Data processing for accounting purposes.</li> <li>○ Processing of data in relation to customer complaints and incident reports.</li> </ul> </li> <li>• <b>Contract (GDPR Article 6(1)b)</b> <ul style="list-style-type: none"> <li>○ The use of customer stories and images for marketing purposes is based on an agreement drawn up with a representative of the customer company.</li> </ul> </li> </ul>
<b>5. Data content of the register</b>	<p>The following information of Aidian's corporate customer representatives and other parties, such as potential customer companies or representatives of our partners:</p> <ul style="list-style-type: none"> <li>• First and last name, work email address, work phone number, geographical location and job role/position in the company/organization, company/organization name.</li> <li>• Information about interests and preferences (e.g., products or topics of interest).</li> <li>• Free-form information provided by the data subject in connection with their contacts, such as customer feedback.</li> <li>• Relevant contact history (meetings and contacts, incl. e-mails).</li> <li>• Direct marketing consents and prohibitions.</li> <li>• Information on participation in various events organised by Aidian (including possible food restrictions).</li> <li>• Billing information.</li> </ul>
<b>6. Sources of information</b>	<p>The data is collected from the following sources:</p> <ul style="list-style-type: none"> <li>• from the data subject</li> <li>• from a customer/partner company</li> <li>• from public sources of information, such as company websites, the Trade Register, or social media channels.</li> </ul>
<b>7. Disclosures and recipients of data, protection of personal data transferred</b>	<p>We may disclose information to our partners, for example, who carry out marketing with us and on our behalf, and who consider themselves to be independent data controllers and not processors acting on our behalf. In addition, if the ownership or control of Aidian or its products, services or assets is transferred in whole or in part to a new entity, Aidian may disclose the customer's personal data to the new owner, successor or assignee. Otherwise, the data will not be disclosed to third parties, unless otherwise required by legislation or an order by an authority.</p> <p>We use third-party services to process personal data to provide our services and to make our business more efficient. To ensure a high level of data protection, we use contracts and other arrangements to ensure that service providers process data in accordance with the law and good data protection practices. Some of our service providers or their support functions are located outside the European Union (EU) or the European Economic Area (EEA). If the data processing requires data transfer outside the EU or EEA, we will use appropriate safeguards in accordance with the EU General Data Protection Regulation to guarantee the same level of protection for your data as in the EU.</p>
<b>8. Retention period of personal data</b>	<p>We only store the personal data collected in the register for as long as and to the extent that is necessary and permitted by law in relation to the original or compatible purposes for which the personal data was collected. Once the retention period specified for the data has expired, the personal data will be deleted or converted into a form that no longer identifies the individual.</p>
<b>9. Principles of register protection</b>	<p>We are committed to processing your personal data confidentially and securely.</p> <p>Personal data is protected by appropriate technical and organisational measures against unauthorised processing and access.</p> <p><b>Manual material:</b> Any manual material is stored in a locked space that can only be accessed by persons entitled to information who are committed to secrecy.</p>

	<p><b>Electronically Deposited Data:</b></p> <p>The protection of the register utilises technical data protection (several security mechanisms, such as access control, firewalls, password arrangements) and access to electronically stored data is only available to authorised persons who are committed to secrecy. In addition, organisational safeguards are used, such as appropriate staff training and guidelines on data protection.</p> <p>Aidian has a policy and guidelines on data breaches that enable a quick response to potential data breaches. In accordance with the practice, we assess potential risks and, if necessary, notify the Data Protection Ombudsman and the data subjects.</p>
<b>10. Automated decision-making</b>	The personal data in the customer register is not subject to automated decision-making.
<b>11. Rights of the data subject</b>	<p>The data subject has the following rights described in this section, which the data subject can exercise by contacting the controller using the contact details in section 2. If necessary, we may ask you to clarify the request. Please note that the applicability and scope of your rights will be specified on a case-by-case basis in accordance with the EU General Data Protection Regulation and that in all cases you do not have the rights mentioned below. In addition, Aidian Oy may need to request some additional information about the requester so that we can verify the identity or authorization of the requester.</p> <ul style="list-style-type: none"> <li>• <b>Withdrawal of consent</b> <ul style="list-style-type: none"> <li>○ You can withdraw your consent at any time by notifying us of your withdrawal using the contact details in section 2. The withdrawal of consent does not affect the lawfulness of the data processing carried out before the withdrawal.</li> </ul> </li> <li>• <b>The right to be informed about the processing of personal data and to inspect your personal data</b> <ul style="list-style-type: none"> <li>○ You have the right to be informed about the processing of your personal data. Through descriptions of our privacy practices, such as privacy statements, we aim to provide a comprehensive picture of the processing of personal data in our operations. In addition, you always have the right to ask further questions about the processing of your personal data. You have the right to request access to the personal data concerning you from the data controller and the right to receive a copy of that data.</li> </ul> </li> <li>• <b>Right to rectification</b> <ul style="list-style-type: none"> <li>○ If our personal data concerning you is incorrect or incomplete, you have the right to demand that the data be rectified. If we correct personal data based on your request, we will also notify all parties to whom incorrect data has previously been disclosed of the rectification, as far as possible, in accordance with the General Data Protection Regulation.</li> </ul> </li> <li>• <b>Right to erasure</b> <ul style="list-style-type: none"> <li>○ You can request the erasure of your personal data in accordance with the GDPR, e.g. if your data has been used illegally or the data is no longer needed. However, there is no right to erasure of data, for example, if the processing of data is based on law or if the data is needed to establish, exercise or defend a legal claim. The controller may refuse to carry out the deletion on the grounds laid down by law.</li> </ul> </li> <li>• <b>Right to restriction of processing</b> <ul style="list-style-type: none"> <li>○ If you consider that we process your personal data, e.g. unlawfully, they are inaccurate or you have objected to the processing of your data, you can ask us to restrict the processing of your personal data in accordance with the GDPR. In this case, we may only process the data in limited situations, such as with your consent; to establish, exercise or defend a legal claim; for reasons of public interest; to protect another person.</li> </ul> </li> <li>• <b>Right to data portability</b> <ul style="list-style-type: none"> <li>○ You have the right to receive the personal data you have provided to us in a structured, commonly used and machine-readable format and, if you wish, to transmit such data to another controller, if technically feasible. The request may only be made</li> </ul> </li> </ul>

	<p>in respect of personal data that is processed by automated means and that is based on your consent or a contract.</p> <ul style="list-style-type: none"><li>• <b>Right to object to processing</b><ul style="list-style-type: none"><li>○ For special reasons relating to your personal situation, you also have the right to object to the processing of your personal data. In connection with the request, you must specify the specific situation on the basis of which the processing is objected to. In this case, we are no longer allowed to process your personal data, unless there are compelling legitimate grounds for the processing which override your interests, rights and freedoms, or if the processing is necessary for the establishment, exercise or defence of legal claims. We may refuse to comply with a request for objection on the grounds laid down by law.</li></ul></li><li>• <b>Right to lodge a complaint with a supervisory authority</b><ul style="list-style-type: none"><li>○ You have the right to lodge a complaint with the competent supervisory authority, in particular in the EU Member State where you have your habitual residence, place of work, or where the alleged infringement has occurred, if you consider that the processing of personal data concerning you infringes data protection law. In Finland, the supervisory authority is the Office of the Data Protection Ombudsman (Up-to-date contact information <a href="http://www.tietosuoja.fi">www.tietosuoja.fi</a>). The Office of the Data Protection Ombudsman also provides you with more information on matters related to the processing of personal data and your rights.</li></ul></li></ul>
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