

VATAJANKOSKI PRIVACY POLICY

In accordance with the European Union General Data Protection Regulation 2016/679 (GDPR)

Updated on Jan 12, 2024

- 1. DATA CONTROLLER Vatajankoski Vuohiniityntie 2, PL 12 38701 Kankaanpää Y-tunnus 0398580-2
- 2. NAME OF REGISTER Vatajankoski's customer register

3. PURPOSE OF DATA PROCESSING

The processing of personal data is based on the customer relationship between the controller and the data subject, and the legitimate interests related to it of the controller and third parties.

The information system is used to maintain customer and billing information related to contractual relationships. The data controller or its authorized partner processes customer's personal data in accordance with data protection regulations for the purpose of managing and improving customer relationships, maintaining connectivity and online services, providing and delivering services related to connectivity and online services, maintaining management area agreements, statistical purposes, billing, payment monitoring, and debt collection activities. The data may also be processed for marketing and conducting opinion surveys.

In addition, the processing of personal data is based on mandatory legal obligations. These laws include, among others, the Electricity Market Act and its supplementary regulations, the Energy Efficiency Act, the Consumer Protection Act, and the Land Use and Building Act in the context of line area agreements.

4. INFORMATION CONTENTS OF REGISTER

The following information related to the data controller's customer or other registered individuals may be processed in connection with the register:

- Name, age, or year of birth
- Personal identification number/business ID
- Identifiers such as customer number, location ID, or other unique identifier
- Native language
- Contact information, such as billing address, phone numbers, email address, other address details
- Customer's declared consents and prohibitions regarding direct marketing
- Information related to customer segmentation or profiling
- Communication between customer service and the customer
- Information related to the use of services
- Information related to billing, payment, and debt collection
- Information about energy usage points

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- Equipment information and other necessary information related to the location
- Call recordings (always notified separately regarding call recording)
- Energy consumption data
- Land ownership-related information concerning management area agreements
- Potentially observable information about the use of services
- Actions performed in the service, such as visits to specific pages, conducting searches
- Time, frequency, and duration of visits
- Browser type and operating system
- Device type, such as a computer or mobile device
- IP address
- Session time and duration
- Screen resolution and operating system
- Unique identifier, such as cookie or device ID
- Other information collected with the user's consent

For some of the described information (such as basic information about the registered individual and billingrelated data), providing them is a requirement for the provision of services by the data controller. Legal obligations also require the data controller to collect certain information about the registered individual (such as energy consumption and production data). Failing to provide or preventing the collection of this information may prevent or hinder the provision of the data controller's services. However, as described below, the registered individual has the right to prohibit the collection and processing of certain information (such as marketing consents).

5. REGULAR SOURCES OF INFORMATION

Customer information is obtained from customers through various means, including requests for quotations, orders, contracts, and other contacts. Information is also collected from the data generated or recorded during the customer's use of products or services, such as energy consumption data obtained from consumption meters.

Personal data may be collected, stored, and updated from registers maintained by Suomen asiakastieto Oy, the Population Register Centre, and other address, update, and similar service providers who act as data controllers. Additionally, information is updated based on the rules of data exchange in the electricity markets.

All customer contacts can be recorded. Recordings are used for verifying contacts, handling complaints, and improving customer service. Phone calls may also be recorded.

6. REGULAR DISCLOSURES OF INFORMATION

Data from Vatajankoski's customer register is primarily disclosed only to third parties involved in the provision of the service package, such as debt collection services. In addition to the above, data is only disclosed with the consent or request of the data subject or their legally authorized representative or to fulfill legal obligations.

Data may be disclosed to energy sector operators within the limits allowed and required by energy market and other legislation. For example, the disclosure to electricity market operators is guided by the non-discrimination rules of the electricity markets and the rules of data exchange in the electricity markets.

Information is disclosed to authorities in cases required by law, such as in the investigation and prevention of misuse.



7. TRANSFER OF DATA OUTSIDE THE EU OR EUROPEAN ECONOMIC AREA

Personal data is transferred to countries outside the European Union or the European Economic Area only in accordance with the procedures required by data protection legislation, such as by using standard contractual clauses approved by the European Commission.

8. DATA RETENTION

The data subject's information is retained only for as long as necessary to fulfill the purposes defined in point 3.

The most significant legal obligation regarding retention periods is the obligation to correct consumer customer billing, which determines a data retention period of ten (10) years. The retention period for information related to legal collection is 20 years.

9. DATA PROTECTION PRINCIPLES

The data in the personal register is collected into databases protected by firewalls, passwords, and other necessary technical measures.

Access to the data is limited to employees of Vatajankoski or authorized agents who require the information for their job duties. We require our staff and partners to commit to the confidentiality of customer data. They are provided with usernames and passwords for access.

Any manually held materials are stored in Vatajankoski's premises, which are locked and monitored.

10. RISK MANAGEMENT

Vatajankoski's absolute goal in processing personal data is to ensure that it does not pose a risk to the data subjects.

Risk management measures include regular risk monitoring, impact assessments related to data processing, and employee training.

In the event of a data breach, the risk to the data subject is assessed. If it is determined that there is a significant risk to the rights and freedoms of the data subject, the data subject will be notified without undue delay.

11. RIGHT OF ACCESS, RIGHT TO OBJECT AND RIGHT TO RECTIFICATION

In accordance with regulations, the data subject has the right to access the information about them held in the register. If there are inaccuracies in the data, the data subject can request the correction of these errors. The data subject also has the right to request the deletion or transfer of their data and to restrict or object to the processing of their data.

Requests for access and corrections should be made in writing, signed, and sent to the address provided below. The request should include a copy of a government-issued photo identification for verification purposes.



Vatajankoski henkilötietojen tarkastuspyyntö Vuohiniityntie 2, PL 12 38701 Kankaanpää

Or by visiting the data controller's office in person (with proof of identity) with a signed document at the aforementioned address.

We will respond in writing within 30 days from the date the data subject's written request for access is received or when the data subject has visited our office in person to make the request.

The data subject has the right, as per regulations, to prohibit the use of their data for direct marketing, distance selling, or opinion surveys, and to withdraw their consent for the processing of personal data by notifying us in writing or by calling our customer service at 02 5782 5303.

Vatajankoski may charge a reasonable fee for providing the requested information if the data subject exercises their right of access more than once a year.

12. OTHER

Every data subject has the right to lodge a complaint with the supervisory authority if they believe that the processing of their personal data has violated their statutory rights.

13. CHANGES TO PRIVACY POLICY

Vatajankoski reserves the right to make changes to this privacy notice. It is advisable to regularly review the content of the privacy notice.