

Privacy notice for LocalTapiola Group's investment business

This privacy notice describes what data are saved in LocalTapiola Group's investor data file, and it outlines the purposes for which the data are used, how the data are protected, and where the data subject can get more information with regard to their personal data.

1. Controllers

LocalTapiola Group
Revontulenkujä 1
FI-02010 LÄHITAPIOLA

The controllers are the following companies part of LocalTapiola Group:

1. LocalTapiola Alternative Investment Funds Ltd
2. LocalTapiola Real Estate Asset Management Ltd
3. The LocalTapiola regional companies.

Funds administered by LocalTapiola Alternative Investment Funds Ltd and structures administered by LocalTapiola Real Estate Asset Management Ltd, or structures which the foregoing own, also act as controllers.

For more information on LocalTapiola Group, visit the LocalTapiola website www.lahitapiola.fi.

2. Data Protection Officer's contact details

For more information on personal data and the processing of personal data, contact LocalTapiola Group's Data Protection Officer. In addition, the LocalTapiola website, www.lahitapiola.fi, provides information on the principles governing the processing of personal data at LocalTapiola Group as a whole.

By email: tietosuoja@lahitapiola.fi

By mail: LocalTapiola Group
Legal & Compliance / Data Protection Officer
Revontulenkujä 1
FI-02010 LÄHITAPIOLA

3. Purposes of and legal grounds for the processing of personal data

Data subjects' personal data are processed in accordance with the EU's General Data Protection Regulation (hereinafter 'the Data Protection Regulation'), Finnish data protection legislation and all other applicable provisions.

Purposes of the processing

Personal data are used for the carrying on of the investment activities of Alternative Investment Funds, of the funds it administers and of Real Estate Asset Management. Additionally, the data are also used for trading in the investment related property of the funds which Alternative Investment Funds administers, of the structures which Real Estate Asset Management administers and of the LocalTapiola Group insurance companies.

The data are needed for the execution and targeting of transactions, for customer service and customer communications, for reporting, for risk management and to fulfil the necessary regulatory requirements. Additionally, the data are also used for the marketing, use monitoring and analysis of, and to compile statistics on the use of, LocalTapiola Group's services and products, as well as for the development of products and services, for ensuring the quality and security of the services, and for the investigation of abuses.

Profiling

The processing of personal data may involve profiling. Profiling is employed in tasks such as the targeting of marketing efforts in order for the products and services marketed to meet customer needs.

For general information on profiling, visit the LocalTapiola website www.lahitapiola.fi/henkilo-tietojenkasittely.

Customer due diligence, and prevention of money laundering and countering of terrorist financing

The customer due diligence data, the due diligence data on other business related partners or counterparties and the data subject's other personal

data may be used for the prevention, countering, exposure and investigation of money laundering and terrorist financing, and for initiating investigations of money laundering and terrorist financing and of criminal offences committed to obtain any property or proceeds of crime that are subject to money laundering or terrorist financing.

The data subject's personal data may be used for investigating whether any of the sanctions or asset freeze decisions with which the controller complies apply to the data subject.

Legal grounds for the processing

In the main, LocalTapiola processes the data subject's personal data on the basis of the relevant contractual relationship and the measures that precede the contract conclusion.

Personal data may also be processed on the basis of:

- the data subject's consent, such as consent to execute electronic direct marketing;
- the controller's statutory obligations, such as the obligations laid down in tax legislation;
- the controller's legitimate interests, such as use of the data for direct marketing, provided that the data subject is aware of this and has not prohibited this. Usually, the controller's legitimate interest is founded on a customer relationship between the controller and the data subject, or on a comparable relationship.

4. Registered groups of persons

- The persons who have or who have had an investment activity-related customer relationship with Real Estate Asset Management, Alternative Investment Funds or a fund it administers (investor customers)
- The parties selling investment-related property to or buying such property from funds administered by Alternative Investment Funds, to/from structures administered by Real Estate Asset Management or to/from structures they own, and to/from the LocalTapiola Group insurance companies (buyers and sellers)
- Potential investor customers as well as potential buyers and sellers
- The persons linked to investor customers, to buyers and sellers, to underlying funds, to potential investor customers or buyers and sellers or underlying funds, such as trustees, agents or other representatives as well as persons acting on behalf of entities or firms (representatives and agents).

5. Personal data stored in the data file

- The basic data on the investor customer, such as:
 - name, contact details
 - personal identity code or date of birth
- The basic data on the buyers and sellers, such as:
 - name, contact details
 - personal identity code or date of birth
- The basic data on the potential investor customer, such as:
 - name, contact details
- The basic data on the potential buyer and seller, such as:
 - name, contact details
 - personal identity code or date of birth
- The basic data on the representatives and agents, such as:
 - name, contact details
 - personal identity code or date of birth
- The data on the investor customer, potential investor customer, buyers and sellers or potential buyers and sellers that are needed for identification and classification, such as:
 - an explanation of the source of the funds
 - data on financial position
 - reasons for executing a transaction or using a service
 - any political influence
 - beneficial owners
 - ownership data
 - professionalism-related data
- Investor customer tax liability data
- The complaint and appeal data, such as:
 - unique identification data
 - unique identification data of decisions issued by the appeal or dispute settlement body
 - documents and other materials relating to the complaint or appeal
- The customer communications data, such as:
 - customer letters and newsletters
 - chat conversations
 - telephone recordings
 - online messages.

6. Regular sources of data, and disclosure of personal data

In the main, all data are obtained directly from the data subject, from parties authorised by the data subject and from registers maintained by public authorities.

Personal data may be disclosed within LocalTapiola Group insofar as permitted under the law.

Personal data are disclosed to parties external to LocalTapiola Group only with the data subject's consent or whenever there is a specific legal ground for the disclosure of data.

7. Transfer of personal data outside the European Union or the European Economic Area

Personal data may be transferred outside the EU or the EEA insofar as data protection legislation permits.

Some external service providers or other recipients of personal data may be located, or they may process personal data, outside the EU or the EEA. LocalTapiola employs the necessary transfer mechanisms available in legislation to ensure that the level of the protection of personal data is not compromised in cases where they are transferred outside the EU or the EEA. Such transfer mechanisms include the European Commission's equivalence decisions and the conclusion of standard clauses with any recipient of data located outside the EU or the EEA.

8. Retention period of personal data

LocalTapiola Group determines the periods for which personal data are stored with due consideration of the requirements laid down in applicable legislation and of the smooth operation of business. The purpose of the storage periods is to safeguard the data subjects' and LocalTapiola's rights.

The period for which the data subject's personal data are stored varies according to the type of transactions the data subject conducts or has conducted. For instance, investor customers' data are, as a general rule, stored for 10 years from the termination of the customer relationship.

9. Principles for the protection of personal data

In the protection of personal data, we use the necessary technical and organisational means that are aligned with best practices, including:

- Limitation and management of access rights
- Registration of personal data processing operations

- Training of and provision of instructions to personnel
- Various encryption and protection techniques
- Monitoring of cyber security
- Firewalls, and differentiation of environments
- Ensuring the security of facilities
- Access control.

LocalTapiola Group also requires that the subcontractors it uses ensure the appropriate protection of the personal data processed, and the activity of subcontractors is inspected and audited where necessary.

10. Data subject's rights

Withdrawal of consent

If the processing of personal data is based on the data subject's consent, the data subject has a right to withdraw their consent to process their data. Withdrawal has no impact on any processing that has taken place before the withdrawal.

Right of access

Data subjects have a right to obtain confirmation as to whether or not their personal data are being processed, and they enjoy the right to be given a copy of their data.

Right to rectification

Data subjects have a right to demand rectification of all inaccurate or incomplete data.

Right of erasure

Data subjects have a right to request erasure of their personal data.

Other rights

Data subjects have a right to object to the processing of their data for direct marketing purposes and for direct marketing-related profiling. Under some circumstances, data subjects have a right to request restriction of the processing of their personal data or to otherwise object to the processing of their personal data. In addition, data subjects may request transfer, in a machine-readable format, of the data they themselves have submitted, if technically feasible.

Data subjects may exercise their rights using the contact details provided under Section 2 or some other contact details communicated for this purpose.

Where the data subject finds that the processing of their personal data is not lawful, they may lodge a complaint with the relevant supervisory authority.

