

LocalTapiola Finance Ltd's privacy notice

This privacy notice describes what data are saved in LocalTapiola Finance's 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. Controller

LocalTapiola Finance Ltd
Tietotie 9
FI-01530 Vantaa

2. Data Protection Officer's contact details

For more information about the personal data in the data file and about the processing of these data, contact the LocalTapiola Group 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
FI-02010 LÄHITAPIOLA

3. Purposes of the processing of personal data, and the basis for the processing

Data subjects' personal data are processed in accordance with the EU's General Data Protection Regulation (2016/679) (hereinafter 'the Data Protection Regulation') and the other applicable provisions, and in compliance with good data management and data processing practice.

Personal data are processed for the purpose of discharging duties and operating services that relate to LocalTapiola Finance's credit institution activity.

The below table identifies the purposes of the processing of personal data and the lawful basis for the processing more precisely.

Purpose of the processing	Lawful basis
<p>1) Provision of products and services, and performance of contractual obligations</p> <p>For this purpose, personal data may be processed for example in the context of offer requests, credit decisions, background checks, product and service management, invoicing, payments, submission of notifications, feedback and contact management, meetings, and customer service.</p>	<p>The contract between the controller and the data subject, or the drafting of that contract (consumer customers).</p> <p>The controller's legitimate interest to provide products and services and to ensure the performance of contractual obligations (representatives of corporate customers).</p>
<p>2) Marketing of LocalTapiola Group's products and services, and performance of opinion and customer surveys</p> <p>For this purpose, personal data may be processed for example in the context of customer surveys and customer segmentation as well as when sending electronic direct marketing. In the course of this processing customer profiles may be created to target marketing.</p>	<p>The controller's legitimate interest to provide information on the products and services to existing and potential future customers and to further develop the quality of the products and services.</p> <p>The data subject's consent (when required by law), such as an individual's consent to electronic direct marketing.</p>

Purpose of the processing	Lawful basis
<p>3) Management and safeguarding of IT systems and services For this purpose, personal data may be processed for example in the context of collecting log files, locating faults, testing the functioning of systems and services, making backup copies and managing changes to systems and applications.</p>	<p>The controller's legitimate interest to manage and ensure the safety and security of the systems and services.</p>
<p>4) Measurement and development of service use For this purpose, personal data may be processed for example in the context of compiling statistics on service use.</p>	<p>The controller's legitimate interest to measure service use and based on the results to improve the services. The data subject's consent (when required by law), such as consent for the placement of cookies on the user's device.</p>
<p>5) Discharge of statutory obligations and those laid down in guidelines and instructions issued by public authorities For this purpose, personal data may be processed for example:</p> <ul style="list-style-type: none"> • to ensure compliance with fiscal and accountancy legislation; • to prevent, expose and investigate money laundering and terrorist financing; • to prevent, observe and investigate other possible abuses and data breaches; • to manage the data subjects' rights (such as consents and processing prohibitions). 	<p>Compliance with the controller's statutory obligations. The controller's legitimate interest to protect property and to ensure business continuity.</p>

The personal data which it is necessary to disclose to perform contractual and/or legal obligations and to produce the services will be notified to the data subject in each given context.

4. Automated decision-making, including profiling

The processing of personal data may involve automated decision-making in the context of the provision of products and services. Automated decision-making is necessary for the preparation of credit decisions and finance offers and for the conclusion of contracts. Automated decision-making occurs when the customer is acquiring a product or service which a reseller provides. The reseller gives additional information on automated decision-making during the product or service purchase process. The consequences of the above automated decision-making for data subjects affect the provision or characteristics of the service or product as well as the charges borne by the customer.

Personal data may also be processed to create customer profiles. Customer profiling aims to identify the special characteristics of target groups for marketing purposes. In practice profiling is about customer segmentation, which does not involve any automated decision-making that could produce for data subjects any legal effects or effects that are otherwise significant. Profiling may utilise for example information that the data subject belongs to a certain age group or lives in a certain residential area.

5. Registered groups of persons

- Persons who are or who have been in a customer relationship with LocalTapiola Finance
- Potential customers
- Persons involved in the customer relationship, such as agents or other representatives
- Company-specific persons subject to registration under the statutory obligations.

6. Personal data stored in the data file

- a) The customer related data, including:
- contact details, such as the name, address, telephone numbers and email address
 - identification data, such as the personal identity code, date of birth, nationality,
 - profession, education, political influence
 - employment relationship data
 - customer interests, such as family interest, guardian interest and representative interest
 - death date
 - banking details, account number
 - income data
 - information about other loans
 - credit decision data
 - online service registration data
 - taxation data with respect to Finland
 - data on the customer's activity and business relations.
- b) The customer relationship related data, including:
- general data, such as the company with which the customer has a customer relationship and the insurances that the customer has
 - customer-specific information, such as the contacts made by the customer and documentation of the customer related tasks
 - telephone recordings
 - indication of the customer relationship management contracts
 - data on S Group loyalty customer membership and related payments and bonuses
 - data and materials that relate to the conducting of legal matters and mediation
 - consents and prohibitions relating to the processing of customer data, such as any possible non-disclosure for personal safety reasons ('turvakielto').
- c) The marketing related data, including:
- consent to email and mobile phone marketing
 - targets and actions of direct marketing
 - direct marketing opt-outs.

7. Regular sources of data, and disclosure of personal data, as well as processing on behalf of the controller

The data in the personal data file are obtained directly from the customer, from parties authorised by the customer, from registers maintained

by public authorities (the Population information register) insofar as permitted by law, from the positive credit register and from the credit register (Suomen Asiakastieto Oy or Bisnode Finland Oy).

The controller may transfer personal data within LocalTapiola Group.

Personal data are disclosed to parties external to LocalTapiola Group only with the customer's consent or where there is a specific legal ground for the disclosure of data, such as when disclosing personal data to a public authority in situations required by law. The controller uses external service providers and subcontractors to process personal data. Service providers that produce for example IT systems, recovery and legal services and other services are engaged in the processing of personal data. By imposing adequate contractual obligations, the controller ensures that the processors process personal data lawfully and otherwise appropriately.

More information on the parties to which personal data are transferred is available upon request from the LocalTapiola Group Data Protection Officer.

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

The controller may transfer personal data outside the EU or the EEA. 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. In order to guarantee the appropriate protection of personal data, LocalTapiola Group employs the necessary transfer mechanisms to ensure that the level of protection of personal data is not compromised in cases where they are transferred outside the EU or the EEA. These types of transfer mechanism that LocalTapiola uses include the European Commission's equivalence decisions and conclusion of standard clauses with those recipients of data which are located outside the EU or the EEA.

More information on the transfer of personal data and on the transfer mechanisms which LocalTapiola applies is available from the LocalTapiola Group Data Protection Officer.

9. Storage period of personal data

The controller determines the periods for which personal data are stored with due consideration of business and the requirements laid down in applicable legislation, such as the statutory storage period requirements, the applicable limitation periods, and considerations to ensure the smooth operation of business. Often a data subject's personal data must be kept stored also

after the customer relationship has ended. More information on the storage periods is available from the LocalTapiola Group Data Protection Officer.

A data subject's personal data are stored for different uses, and the personal data are stored only for the period of time that is necessary from the perspective of each use. With respect to storage periods, the controller complies with the following fundamental principles:

- Personal data are retained for the duration of the relationship with the customer and, after this, for such length of time as is necessary to comply with the applicable statutory obligations or to pursue the controller's legitimate interests. Statutory obligations of this kind follow for example from the Act on the Registration of Certain Credit Providers and Credit Intermediaries and from the Accounting Act.
- Personal data that are processed for marketing and market research purposes are retained for the duration of the marketing campaign or customer survey or up until the point at which the data subject cancels their marketing subscription.

10. Principles for the protection of personal data

- Data processing rights management is employed to monitor that only authorised persons may process the data in the data file.
- Those processing any data in the data file are under an obligation of confidentiality.
- The data file is maintained in LocalTapiola Group's network, which is isolated from the public telecommunications network by means of firewall solutions.
- All confidential data transmitted in the public telecommunications network are encrypted by technical means.
- A register is maintained of the use of the data stored in the data file.
- The data file documentation is kept in access control protected facilities, and processing rights management is employed to monitor their use.

11. The data subject's rights

Withdrawal of consent

Where 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.

Withdrawal is to be made to the Controller using the contact details provided under Section 2 or some other contact details communicated for this purpose.

Right of access

The data subject has a right to access his or her data that are saved in the data file. The request for access must be signed and submitted in writing to the Controller using the contact details provided under Section 2.

Right to rectification

The data subject has a right to demand rectification of all inaccurate or incomplete data by sending a signed request to this end in writing to the Controller using the contact details provided under Section 2.

Right to object

The data subject has a right to prohibit the controller from processing the data subject's data for purposes such as direct marketing, marketing- or direct marketing-related profiling, distant sales, market analysis and opinion surveys. The prohibition must be signed and notified in writing to the Controller using the contact details provided under Section 2.

Other rights

Under some circumstances, the data subject also has a right to request erasure of their personal data or restriction of the processing of their personal data, or otherwise to object to the processing of their personal data. In addition, based on the Data Protection Regulation, the data subjects may request the transfer, in a machine-readable format, of the data they themselves have submitted, if technically feasible.

Where a data subject finds that the processing of their personal data is not lawful, they may lodge a complaint with the relevant supervisory authority. It would be appropriate, however, to deal with the matter principally in cooperation with the Controller.

12. Changes to the privacy notice

The controller continuously develops its services and may consequently be obliged to change and update this privacy notice as necessary. The changes may also be based on changing data protection legislation. We recommend that you familiarise yourself with the privacy notice on a regular basis. Should the changes contain any new purposes for the processing of data subjects' personal data, the Controller will notify of these in advance and will request consent where necessary.

