

Privacy notice of Asset Management and Life's joint savings-mapping data file

This privacy notice describes what personal data are saved in LocalTapiola Asset Management Ltd and LocalTapiola Mutual Life Insurance Company's joint savings-mapping data file, 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.

LocalTapiola Asset Management acts as LocalTapiola Mutual Life Insurance Company's agent when it sells and markets Life's savings life insurance and unit-linked insurance policies and saving and investment services. In the processing of personal data related to the sales and marketing of savings life insurance and unit-linked insurance policies, the companies operate as joint controllers within the meaning of Article 26 of the Data Protection Regulation. The parties have agreed mutual procedures to ensure the implementation of data subjects' rights and comply with the obligations set out in the Regulation.

1. Joint controllers

LocalTapiola Asset Management Ltd
Revontulenkujä 1
FI-02010 LÄHITAPIOLA

LocalTapiola Mutual Life Insurance Company
Revontulenkujä 1
FI-02010 LÄHITAPIOLA

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

2. Data Protection Officer's contact details

For more information about 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 the processing of personal data, and the basis for the processing

Personal data are processed for purposes related to the sales of unit-linked insurance policies, the determination of insurance need and the provision of insurance, as well as for the purposes of the provision of investment service-related products and services.

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, insurance legislation, investment service legislation and other applicable provisions.

The basis for the processing

In the main, the controllers process the data subject's personal data on the basis of contractual relationship and pre-contractual measures. Processing can also be based on the controllers' statutory obligations, including the requirements laid down in tax legislation and in the Insurance Companies Act or the Act on Investment Services.

4. Registered groups of persons, and the personal data stored in the data file

Group of persons	Personal data
1. Policyholders	The basic data, including: • name • contact information • personal identity code • investor classification data. The customer identification, classification, appropriateness assessment and suitability assessment data referred to in the applicable laws and official regulations, including: • an explanation of the source of the customer's funds • investor data (investor experience and knowledge, and the nature of the investment activity) • data on the customer's financial position • education, profession, political influence, family relations • ordinary financial transactions. Other data needed to map the customer's situation and to provide service
2. Potential customers	The basic data, including: • name • contact information • personal identity code • investor classification data. The customer identification, classification, appropriateness assessment and suitability assessment data referred to in the applicable laws and official regulations, including: • an explanation of the source of the customer's funds • investor data (investor experience and knowledge, and the nature of the investment activity) • data on the customer's financial position • education, profession, political influence, family relations • ordinary financial transactions. Other data needed to map the customer's situation and to provide service
3. Persons connected to the customer, including guardians, authorised persons or other representatives	The basic data, including: • name • contact information • personal identity code.

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

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

Personal data may be disclosed within LocalTapiola Group and to a firm belonging to the same economic interest grouping 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. On the basis of the law, personal data may be disclosed to authorities, including the Financial Supervisory Authority and the tax authorities.

In the processing of personal data, external service providers and subcontractors are used that act as processors of personal data. These include service providers that produce IT systems.

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

No personal data are transferred outside the EU or the EEA in the processing of personal data described in this notice.

7. Storage period of personal data

The controllers determine the storage periods of personal data with due consideration of the purposes of use of the personal data, the requirements set in the applicable legislation and the smooth operation of business. Personal data are stored for the period during which they remain necessary.

Policyholders' personal data are stored for the duration of the contract term and 10 years after contract termination, based on the Insurance Contracts Act and the Act on Investment Services. Potential customers' personal data, including the insurance need mapping data, are stored under the Act on Investment Services for seven years from submitting an offer, in case a contract is not concluded.

8. Principles for the protection of personal data

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

- Access rights limitations and management
- Registration of personal data processing operations
- Training of and the provision of instructions to personnel
- Various encryption and protection techniques
- Monitoring of cyber security
- Firewalls, and the differentiation of environments
- Ensuring the security of facilities
- Access control.

The controllers also require that their subcontractors ensure the appropriate protection of the personal data processed, and the activity of subcontractors is inspected and audited where necessary.

9. The data subject's rights

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

A data subject has the 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.

