

PRIVACY POLICY – COMMERCIAL REAL ESTATE

This privacy policy describes how we process the personal data of you as the contact persons of our tenants.

1 CONTROLLER

The controller of your personal data is your lessor, your lessor being either A. Ahlström, Ahlström Kiinteistöt (as defined below), or a real estate company owned by A. Ahlström or Ahlström Kiinteistöt.

Controller	A. Ahlström Oy (hereafter "A. Ahlström")
Business ID	1670034-3
Address	Eteläesplanadi 14, 00131 Helsinki
Phone Number	+358 10 888 18

Controller	A. Ahlström Kiinteistöt Oy (hereafter "Ahlström Kiinteistöt")
Business ID	2566575-4
Address	Laviantie 22, 29600 Noormarkku
Phone Number	+358 50 5183677

The controllers are jointly referred to as "we".

2 LEGAL BASIS AND PURPOSE OF PROCESSING

We process your personal data for the purposes of maintaining our tenancy and developing our real estate and related services. We use your personal data for billing purposes and to communicate to you about news relating to the real estate and to send information about our services. The legal basis for the processing is our legitimate interest. You may opt out from receiving any marketing messages from us.

3 PERSONAL DATA COLLECTED

The personal data we process of you include:

- contact information such as your name, address, e-mail and telephone number; and
- company and position.

4 RETENTION PERIODS OF PERSONAL DATA

We retain the information described above throughout the tenancy as long as you are the designated contact person of your company. We delete your information when you no longer hold the position as contact person for your company.

5 HOW DATA IS COLLECTED

In general, the data is collected from you or by somebody else at your company. The data may also be collected from publicly available data sources such as companies' websites, the trade register as well as from other public or private registers.

6 DISCLOSE OR TRANSFER OF DATA

Processing activities may be outsourced to external service providers in accordance with and within the limits set by data protection legislation. Main operators to whom processing tasks have been outsourced include IT-service providers and CRM-tool providers. We may disclose your personal data to other companies within the Ahlström Group as many operative functions are centralized within the group.

7 TRANSFER OF DATA OUTSIDE THE EU/EEA

Some of our service providers are located outside the EU or EEA. We ensure a high level of protection for the transfers of personal data outside the EU or EEA by using standard clauses for international data transfers set out in EU Commission Implementing Decision 2021/914 or by another other appropriate safeguard.

8 SECURITY MEASURES

The personal data is stored and processed only by designated who need to have access to the data for the purpose of their work. The purpose of these actions is to ensure the confidentiality of personal data, the availability and integrity of the data, and the exercise of the rights of data subjects.

9 RIGHTS OF THE DATA SUBJECT

As a data subject, you have certain rights under the General Data Protection Regulation 2016/679 (GDPR). Below are short descriptions of these rights.

Right to access: Data subjects have the right to receive confirmation from the controller on whether the controller is processing personal data that concerns them. The controller must provide the data subject with a copy of the personal data being processed. As a rule, the exercise of rights is free of charge.

Right to rectification: Data subjects have the right to demand the rectification of inaccurate personal data concerning them and to have incomplete personal data completed.

Right to erasure: In certain cases, specified in Article 17 of the GDPR, the data subject has the right to have the controller erase data concerning them. For example, when the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed.

Right to restriction of processing: In certain cases, specified in Article 18 of the GDPR, the data subject can request the controller to restrict the processing of personal data concerning them. The right to restriction exists, for example, when the data subject contests the accuracy of the personal data. In such cases, the processing will be restricted for a period enabling the controller to verify the accuracy of the personal data.

Right to object: In certain situations, the data subject has the right to object to the processing of their personal data, that is, request the controller not to process it at all. If the data is processed for the performance of a task carried out for the purposes of the compelling legitimate interests pursued by the controller or a third party, the data subject has the right to object to the processing on grounds relating to their particular situation. In such cases, the processing must be stopped unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the data subject.

If the personal data is processed for direct marketing based on legitimate interest, the data subject has the right to object at any time to the processing without any specific grounds, after which the data may no longer be processed for purposes of direct marketing (this includes profiling related to direct marketing).

Right to data portability: The data subject has the right to receive the personal data that they have provided to a controller in a structured, commonly used, and machine-readable format and, if desired, transmit that data to another controller.

Right to withdraw consent: If personal data is processed based on consent, the data subject has the right to withdraw consent by informing the controller. Withdrawal of consent does not affect the lawfulness of the processing carried out prior to the withdrawal of consent.

Right to lodge a complaint with the supervisory authority: The data subject has the right to lodge a complaint with the competent supervisory authority if the data subject considers that the controller has not complied with the applicable data protection regulation.

In all matters relating to the processing of personal data and in situations involving the exercise of rights, you should contact us at privacy@ahlstromcapital.com, or by calling +358 10 888 18.