



# Keliber Oy Privacy notice

## The purpose and scope of this privacy notice

Keliber Oy (later “**Keliber**” or “**We**”) is committed to ensuring the confidentiality and data protection of personal data at its possession. This privacy notice is applied to personal data that we collect in relation to the products and services that We offer (later “**Data Filing System**”). The personal data and their processing is described in this privacy notice. Additional information regarding the processing of personal data in the Data Filing System is provided by our contact person Katri Kukkonen, [info@keliber.fi](mailto:info@keliber.fi).

We may update this privacy notice from time to time, for example due to changes in applicable legislation. We will use reasonable efforts to inform you of any possible changes and their effects in due time beforehand. Therefore, we advise you to review this privacy notice always after becoming aware of any changes. This privacy notice was last updated on March 19, 2020.

## Data controller

Name: Keliber Oy

Address: Toholammintie 496, 69600 Kaustinen

Tel: +358 10 567 0600

Business ID: 0752546-7

Data Protection Officer:

Hannu Hautala

Email: [info@keliber.fi](mailto:info@keliber.fi)

Tel.: +358 10 567 0600

## Whose Personal Data Do We Collect?

In the Data Filing System, we process the personal data of:

- Contact persons and representatives of Keliber’s prospective customers, former, current and prospective suppliers and other business partners;
- Persons who visit our website or submit their contact information to subscribe to our newsletters, fill out surveys, participate in a competition or attend our events;

- Other stakeholders who interact with us, such as current shareholders, potential investors, analysts or landowners.

### **What Categories of Personal Data Do We Process?**

We may process the following categories of personal data in our Data Filing System:

- Basic information, e.g. your name, profession, title, your employer or the organization you represent, your industry, as well as your contact details such as postal address, phone number and email address;
- Information on the business relationship, e.g. products and services you are interested in;
- Information relating to your use of our digital services, e.g. registration data for a user account, information about the service use, information collected using cookies and other similar methods, such as the type of web browser or device you use, your browsing history on our website, your IP address, links you have clicked in an email or on our website, materials you have downloaded or the website from which you have arrived at our website;
- Information related to contacts and meetings, e.g. feedback and contact requests, digital forms, targeted marketing efforts, or meetings and events you have participated in;
- Classification data, e.g. marketing segments derived from the data described above.

### **Which Sources Do We Use to Collect Personal Data?**

The personal data that we process about you are:

- Given to us by yourself (e.g. when using our website, registering as a user of our services, sending a request for information, filling out a form, purchasing, ordering or offering products and services, participating in our events, or otherwise interacting with us by phone or digitally);

- Given to us by your employer or the organization you represent in connection with the business or other relationship between us and your employer/organization;
- Collected automatically by using digital technologies, including cookies (e.g. when you use our website);
- Collected from other legitimate sources, e.g. public and private company and business registers, public authorities, postal operators, public telephone directories, direct marketing companies, and other similar public and private registers.

### **Basis for, Purposes and Impacts of Processing Your Personal Data**

The basis for processing of your personal data conducted by Keliber is:

- The implementation of a contract between Keliber and its customer, supplier or other partner organization, as well as the execution of the steps prior to entering into such contract, e.g. processing quotations;
- Keliber's legitimate interest;
- Your consent; or
- Keliber's Compliance with a legal obligation

We process your personal data for the following purposes:

- Delivery or purchase of products and services;
- Managing customer, supplier, shareholder or other cooperation relationships;
- Marketing and development of our products and services;
- Providing you information you have requested from us;

- Facilitating communication between you and us and collecting feedback from customers, suppliers and other cooperation partners;
- Maintaining and developing our website;
- Analysis, reporting, segmentation, and statistics for the purposes explained above.

We do not further process your personal data for other purposes than those described in this privacy notice.

### **Regular Disclosures and Transfers of Your Personal Data to Third Parties**

We may disclose your personal data to our subcontractors and other business partners. These kinds of parties are e.g. IT, technology and other similar service providers hosting and maintaining our data, as well as possible providers of other professional services. We shall, upon your request, provide you with a list of our subcontractors and other business partners that we use for the processing of your personal data.

Our subcontractors and business partners are allowed to process your personal data only to the extent necessary for the customer relationship management and maintenance related tasks they are performing for us. We require that all our subcontractors and business partners keep the personal data we provide them confidential and adequately secured. They are also required to comply with the applicable data protection laws, Keliber's privacy and information security policies, and the relevant service agreement.

In limited circumstances, Keliber may also disclose your personal data to other third parties when required by law or if we have a legitimate interest to do so.

### **Transfers of Your Personal Data outside the EU or European Economic Area**

We only process your personal data within the EU and the EEA, and your data will not be transferred outside the EU and the EEA.

We contractually require recipients of personal data to only use the data for the intended purpose of the disclosure and to destroy or return it when it is no longer needed.

### **Principles for the Retention of Your Personal Data**

We will only retain your personal data in the Data Filing System for as long as necessary to fulfil the purposes we collected it for, however not more than for 2 years or as required by applicable legislation. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the data, the potential risk of harm from unauthorized use or disclosure of the data, the purposes for which the data were collected originally, the time limits on legal claims and the applicable legal requirements.

### **Rights of a Data Subject in Relation to the Processing of Personal Data**

As a data subject you have the right to, according to applicable data protection legislation, at any time:

- **Information and access:** You may request to obtain access to your personal data, obtain information on the processing of your personal data, and to review your personal data we process.
- **Rectification:** You may request to rectify and/or to complete inaccurate or incomplete personal data.
- **Erasure:** You may request to have your personal data erased.
- **Restriction:** You may obtain a restriction of processing of your personal data.
- **Object to processing:** You may object to processing of your personal data based on your particular situation and to the extent that your personal data are being processed on the basis of Keliber's legitimate interest.

- **Data portability:** You may receive your personal data in a machine-readable format and transmit those data to another controller (provided that you have delivered us such data yourself, we process such personal data based on an agreement and the processing of personal data is carried out by automated means).

You should present your request for exercising any of the aforementioned rights in the manner described in the 'Contacts' Section of this privacy notice. We may need to request additional information from you to help us confirm your identity and ensure your right to access your data or to exercise any of your other rights. This is an appropriate security measure to ensure that personal data are not disclosed to any person who has no right to receive it.

In cases where the processing of your personal data is based on your consent, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us via the contact details provided above in the section "Data controller". Once we have received notification that you have withdrawn your consent, we will no longer process your data for that specific purpose, unless we have another legal basis for doing so.

You do not have to pay a fee to access your personal data or to exercise any of the other rights. However, we may charge a reasonable fee if your request is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request.

You also have the right to lodge a complaint with the supervisory authority concerned or with the supervisory authority of the EU member state of your habitual residence or place of work, if you consider that we have not processed your personal data in accordance with applicable data protection legislation.

### **Principles of Data Security**

We respect the confidentiality of your personal data. Tangible material containing personal data shall be kept under lock and key in a space to which only separately appointed persons have access. Personal data processed digitally are protected and stored in our information system accessible to persons on a need-to-know basis only. Such persons have personal user credentials and passwords.

We encrypt personal data sent outside our company.

### Information on Cookies and Similar Technologies

A “Cookie” is a commonly used small text file that the internet browser installs on your computer or other terminal when you visit a website. The browser sends information on your visit back to the website when you revisit it. All contemporary websites use cookies in order to offer you a more personal browsing experience.

Each cookie is separately installed on each terminal you use and cookies can be read only by the server that installed the cookie. Because the cookie is bound to the browser, and is not distributable between separate browsers or terminals in general (unless a browser, plugin or other application separately enable this), your choices relating to the management of cookies are applicable only to each separate browser. A cookie cannot control software, and it cannot be used as a medium for viruses or other malware, nor to harm your terminal or files. A single user cannot be identified solely through the use of cookies or similar technologies.

### Contacts

All requests concerning the use of the rights mentioned above, questions about this privacy notice and other contacts should be made by e-mail to Katri Kukkonen to the address [info@keliber.fi](mailto:info@keliber.fi). You may also contact us in writing:

Keliber Oy  
Ristirannankatu 1  
67100 Kokkola