

Privacy statement – client data file

Updated on 24 September 2019

1. Controller

Finnvera plc (Business ID: 1484332-4)
Street address: Porkkalankatu 1, 00180 Helsinki, Finland
Switchboard: +358 (0)29 460 11

2. Contact information

Contact: tietosuojavastaava@finnvera.fi

3. Name of data file

Finnvera's client data file

4. Purpose of and grounds for the processing of personal data

The administration of information about natural persons that are Finnvera's clients, representatives of corporate clients or other parties to financing (such as parties providing security) throughout the entire client relationship life cycle.

Information is used to ensure client relationship management, the management of the client's liabilities and receivables, the risk management and supervision of credit and guarantee operations, the payment of indemnification and the collection of receivables.

The legal basis of the processing according to the Article 6 of the General Data Protection Regulation:

- performance of a contract to which the data subject is party
- compliance with a legal obligation to which the controller is subject
- legitimate interest

Processing tasks may be outsourced to the controller's external service providers in accordance with the data protection legislation and within the framework laid out by legislation.

5. Data contained in the data file

5.1 Personal data categories related to clients

Basic information:

- Information for specifying persons acting on the behalf of an organisation and information about their relation to the organisation in question.

Client relationship information:

- Information for specifying and categorising the client relationship, such as the length and nature of the client relationship

Information related to statutory requirements:

- Information needed for identifying the client and determining the financial position and political power. Data to be stored include the name and the personal identity code, among other things. Finnvera is under an obligation to collect and document

identification information by, for example, taking a copy of a passport, driver's licence or similar identity document.

Contact information:

- Telephone numbers, address details and e-mail address

Financial information:

- Agreement information, such as the agreement type, transaction information and credit history.

5.2 Personal data categories related to potential clients:

Data about potential clients. The data content to be processed is determined on the basis of the group of potential clients, among other things. Typically, the data content may include the following information, for example:

Basic information, such as the data subject's name, personal identity code and contact information, including address, telephone number and e-mail address.

Client relationship information, such as the start date and type of client relationship.

Agreement and product information, such as information about offers given to the data subject by the controller.

Tasks and events related to client relationship management.

6. Retention of personal data

We store your data for as long as necessary for the purpose of their collection and processing or for as long as required by law and regulations.

If we store your data for purposes other than the performance of a contract, the data will be stored only if that is necessary for the purpose in question and/or stipulated by law and regulations.

For example:

- Prevention, detection and investigation of money laundering, the financing of terrorism and fraud: at least five years after the end of the business relationship or the performance of a single transaction
- Accounting regulations: for up to ten years

7. Regular sources of data

Personal data is mainly collected from data subjects themselves. In addition, a personal data file may be collected and updated, to the extent permitted by law, from third-party data files, such as:

- Data files maintained by authorities (e.g. the Population Register Centre, the Tax Administration's registers, business registers, enforcement authorities, the police)
- Credit information controllers
- Information need for determining political power and inclusion within the scope of the international sanctions adhered to by the controller from parties that maintain such databases

8. Regular disclosure of data and groups of recipients

Pursuant to Section 7 of the Act on the Customer Data System for Enterprise Services (293/2017), data may be transferred to a data system to be accessible to the data system's legal users.

Data related to voluntary and judicial collection of receivables is transferred once a day as line transfer to an external service provider. Data to be disclosed include:

- Party data — basic information
- Basic financial information
- Invoice
- Payment schedule

9. Transfer of data outside the EU or the EEA

No regular transfer of data to countries outside the EU or the European Economic Area.

10. Data file protection principles

The controller's personnel are committed to complying with the confidentiality obligations. In addition, the employees have committed to complying with internal information security guidelines.

Manual materials are stored in locked and guarded facilities.

Data stored in information systems and the backup copies are located in locked facilities that are under surveillance. The environment has been protected by means of appropriate firewalls and other technical protection.

The access rights of the data file are restricted with personal user IDs and passwords.

Pursuant to Section 6 of the Act on the Customer Data System for Enterprise Services (293/2017), the Ministry of Economic Affairs and Employment, acting as the technical administrator of the system, is responsible the integrity, protection and storage of the data in the system.

The purpose of the aforementioned measures is to secure the confidentiality of the personal data stored in the data file, the availability and integrity of data as well as the realisation of the rights of the data subjects.

11. Automated decision-making

The data contained in the data file is not used for decision-making that has legal consequences to the person affected and is based on automated processing of data, such as profiling.

12. Data subject's right to object to the processing of their personal data

Related to their specific personal situation, the data subject has the right to object to the profiling affecting them and other processing activities that the controller performs on the data subject's personal data insofar as the basis of the processing of data is the controller's legitimate interest.

The data subject may file their claim concerning the objection in accordance with item 15 of this privacy statement. When filing their claim, the data subject should specify the specific

situation that is the basis of their objection to the processing of their data. The controller may refuse to implement the request concerning the objection on the grounds provided by law.

13. Data subject's right to object to direct marketing

The data subject may grant to the controller their consent to or prohibit direct marketing depending on the channel, including profiling carried out for direct marketing purposes.

14. Data subject's other rights related to the processing of personal data

The data subject has the right to inspect data that has been stored concerning them in the data file. The inspection request should be filed in accordance with the instructions provided in this privacy statement. The inspection right may be denied on the grounds provided by law. As a rule, the regular exercise of the inspection right is free of charge.

Insofar as the data subject themselves can do so, they must, without undue delay after learning about an error or after they themselves have detected an error and at their own initiative, correct, erase or supplement any data in the data file that is in violation of the purpose of the data file, incorrect, unnecessary, incomplete or outdated.

Insofar as the data subject is unable to correct the information, the correction request is filed in accordance with item 15 of this privacy statement.

The data subject also has the right to demand that the controller restrict the processing of their personal data—for example, in a situation where the data subject is waiting for the controller's response to their request concerning the correction or erasure of their data.

The data subject has the right to appeal to a competent supervisory authority if the controller has not complied with the applicable data protection regulations in its operations.

15. Contact information

The data subject should contact the controller in all matters concerning the processing of personal data and the exercise of their own rights. The data subject may exercise their rights by contacting tietosuojaavastaava@finnvera.fi.