

Privacy statement

1. General

This privacy statement includes a description of how personal data are collected, processed and safeguarded at Oy Halva Ab and Oy Halva-Trading Ab (hereinafter referred to also collectively as “Halva”) by ensuring privacy and processing the personal data in accordance with the currently valid legislation and good data protection practices. If you are not willing to accept our practices outlined in this privacy statement, we do not recommend disclosing your data to Halva. However, accessing certain services, such as our online store at www.laku.fi, and signing up for the Karkkiklubi customer loyalty programme require providing us with your personal data.

The data are stored upon signing up for our services (for example, the Karkkiklubi customer loyalty programme, which includes subscribing to a digital newsletter), purchasing products in our online store, accessing our online or mobile services, providing feedback or participating in a marketing campaign (for example, competitions and raffles) or a survey. We collect and store the data provided upon logging in to our service or participating in a campaign and the data stored while using the services.

The data are processed in providing and developing our services, marketing and customer communications and customer service. We also use your data to make our marketing efforts and communications as relevant to the recipient as possible.

2. Controller contact information

Oy Halva Ab
PO Box 244
01511 Vantaa
www.halva.fi
tel. +358 (0)9 774 62 00 (exchange)

3. Contact person

Tarja Nupponen
Financial Manager
tel. +358 (0)400 854311
tarja.nupponen@halva.fi

4. Personal data to be processed

We collect personal data necessary for the purposes specified below. In other words, the purpose defines what data we collect in different situations. In addition, the data processed by us may vary according to what service is accessed and how, which means that persons accessing our services can determine what data will be processed by us. Some data is retrieved through the use of cookies and other similar technologies, which provides us with information on how our services are accessed and how we can provide the best services possible.

Depending on the services accessed, the data collected include the following:

Name and contact details, including first and last name, address and e-mail address.

Demographics, including year of birth and gender.

Account data required by digital accounts, including account/user name and password.

Customer data, including product and order data, invoicing and payment data, customer feedback and contacts, raffle and competition entry data and cancellation data.

Campaign data, including data provided upon participating in raffles, competitions and other campaigns as well as information about participating in campaigns.

Interest and profiling data, including data about interests provided directly and generated on the basis of other data collected.

Marketing consents and prohibitions.

Visual material, including videos and photos about Halva made and taken by consumers and our partners.

Online service access data, including our website's and online store's visitor and browsing data, displayed/visited advertisements and data related to communications.

Other data collected on the basis of consent.

5. Sources of data

Personal data are primarily collected directly from data subjects upon purchasing products from our online store, signing up to the Karkkiklubi customer loyalty programme (and subscribing to our newsletter), participating in various marketing competitions such as games, raffles or questionnaires, providing feedback or contacting us in other matters. Data are collected upon placing an order, registering, providing feedback/contacting us and later on during the validity of the customer relationship/membership.

We may collect data on the use of our online service with cookies, for example. Cookies provide us with information when a person who visited our online service visits the service again.

Personal data may also be collected and updated from our partners' registers, the online services and applications of companies and on the basis of information provided by authorities and companies that provide services related to personal data.

6. The legal basis for and purposes of processing personal data

We use the personal data of our customers for purposes related to managing, maintaining and administrating customer relationships. We process personal data for the purpose of fulfilling the obligations related to the contract established between the customer and us, including, for example, providing customer service, delivering products, sending out newsletters on the basis of a subscription and performing targeted marketing.

In addition, we process personal data whenever it is necessary for protecting our legitimate interests, including, for example, developing our products, services and marketing efforts and their quality.

Where appropriate, we reserve the right to process personal data on the basis of the consent provided by the data subject and whenever we have the legal obligation to do so, for example, on the basis of the Accounting Act. Our digital direct marketing is always based on an advance consent, which can be withdrawn at any time.

7. Disclosure of data

We may disclose the data to authorities, for example, due to legal obligations. In the event of the sale of our business or a part thereof or other corporate transactions, we may also

disclose the data to the purchaser of the business/other party inherently related to the corporate transaction.

We use the services of subcontractors and service providers in processing the data, for example, in the technical administration and provision of online and mobile services and performing campaigns and direct marketing efforts. We only disclose data to these partners for the purposes defined by us and we oblige the partners through contractual arrangements to ensure an adequate level of information security and compliance with the current personal data legislation.

8. The period for which the personal data will be stored

We will only store personal data according to the clauses below and for the duration required for performing the specified purposes according to the current legislation. However, mandatory legislation (for example, legislation related to accounting) may impose us obligations to store the data for a period longer than this. In addition, by derogation from what is presented above and below, we reserve the right to process data anonymously for the purposes of performing analyses, creating statistics and developing our business, products and services.

We store customer data for the validity of the customer relationship and after the termination of the customer relationship for the period during which the parties may present claims about the customer relationship to each other.

The data of members of the Karkkiklubi customer loyalty programme are stored and the digital newsletter is sent periodically for the validity of the membership.

The data of persons participating in marketing competitions, including games, raffles and questionnaires, will be removed within a reasonable period of time, i.e. three months, after the end of the competition, unless the participant has given their consent for direct marketing.

The data of persons who have given their consent for direct marketing will be removed within a reasonable period of time, i.e. a month, after the consent has expired or been withdrawn.

9. Rights of the data subject

In compliance with relevant data protection legislation, data subjects have the following rights:

- The data subject has the right to obtain confirmation of personal data concerning them being processed and the right to obtain access to the personal data concerning them (**right to inspection**).
- The data subject has the right to request inaccurate personal data concerning them to be rectified or completed (**right to rectification**).
- The data subject has the right to request the erasure of their data (**right to be forgotten**) if processing the data is no longer required for fulfilling the purpose for which the data have been collected or if the legal basis of processing is a consent that has been withdrawn and no other legal bases exist. However, we cannot erase the data in order to, for example, deliver a purchase made in the online store or comply with a direct marketing prohibition.
- If, in the data subject's opinion, the data concerning them is inaccurate, the data subject has the right to request the restriction of processing of their data (**right to restriction**) for the duration of verifying the accuracy of their data.

- Under certain conditions, the data subject has the right to have the data concerning them transferred from one system to another (**right to transfer**) if processing is based exclusively on a consent/agreement and the data are processed by automated means.
- Under certain conditions, the data subject has the right to object to the processing of the personal data concerning them, for example, for direct marketing purposes (**right to object**).
- In principle, the data subject has the right not to be subject to a decision based solely on automated processing.
- Insofar as the personal data are processed on the basis of a consent provided by the data subject, the data subject has the right to withdraw their consent at any time.
- The data subject has the right to lodge a complaint with the authority in charge of supervising the processing of personal data.

Please send all questions and requests concerning the rights of data subjects by e-mail to tanja.mantymaki@halva.fi or by mail to Oy Halva Ab, Tanja Mäntymäki PO Box 244, 01511 Vantaa.

10. Consequences of not providing personal data

Choosing not to provide personal data may result in us not accepting your online store order or accepting you in the Karkkiklubi customer loyalty programme or as a participant of a competition or other similar event.

11. Cookies

Our website uses cookies for the purpose of improving our online service. Cookies are a feature of the user's browser that assigns a "user identifier" to the user's device. Cookies are used to track the actions performed on a website by a user. Cookies provide the site administrator information about the pages the user has visited and in which order and how often the user has visited the pages. Cookies cannot be used to identify a person. Instead, their purpose is to distinguish the user's device in order to allow the service provider's system to identify the device whenever the service is accessed. Cookies are not used to store personal data such as names, addresses or e-mail addresses in a register.

Cookies can be disabled in the browser's settings. It is also possible to delete cookies in the browser's settings. This does not stop the collection of data with cookies, however, as it only resets the profile based on previous data.

12. Protection of personal data

Personal data are processed only by the Halva employees who are required to process the data in order to carry out their duties.

We have implemented technical and organisational measures appropriate to ensure that the personal data are protected from unauthorised access, disclosure, loss or other illegitimate form of processing. These measures include, for example, firewalls, encryption, safe premises for physical devices, appropriate access control, controlled licence management and supervision, providing employees involved in processing personal data with appropriate instructions and careful evaluation of subcontractors and providing them with appropriate instructions.

13. Amendments to this privacy statement

We develop our products, services and privacy practices on a continuous basis and we reserve the right to make amendments to this privacy statement whenever necessary. Any

changes in appropriate legislation and its interpretation may also provide grounds for making amendments to this privacy statement.

The currently valid privacy statement can always be accessed in our online services. We recommend reviewing the content of this privacy statement regularly.