

**DATA PROTECTION NOTICE**

**1 GENERAL**

The purpose of this notice is to provide privacy information required by the EU General Data Protection Regulation (hereinafter "GDPR") to the data subject.

**2 THE DATA CONTROLLER AND CONTACT DETAILS**

Vallius Forestry acts as the data controller in accordance with this data protection notice.

The contact persons of the controller and contact details in relation to customer and supplier data matters:

Keijo Mutanen Sales. Chairman of the Board, HHJ. [keijo@valliusforestry.com](mailto:keijo@valliusforestry.com)

**3 THE NAME OF THE REGISTER**

This notice covers personal data processing relating to Vallius Forestry’s customer and supplier register. Data subjects with regard to this processing are Vallius Forestry’s customer’s or supplier’s contact persons. Reference to any customer or supplier will include also our potential customers and suppliers.

**4 THE PURPOSE OF PROCESSING AND APPLICABLE LEGAL BASIS FOR PROCESSING**

The following table provides a summary of the purposes of use and the applicable legal basis as well as the categories of personal data being processed.

<b>Purpose of Use</b>	<b>Legal Basis</b>	<b>Categories of Personal Data</b>
Managing the customer or supplier relationship	Legitimate interests  Fulfilment of a contract	Basic information, Customer / Supplier information, Consents and Prohibitions, Customer/Supplier event information, Analytics and modelled information, Operation information
Customer/Supplier acquisition and marketing Vallius Forestry’s product and service offering and promoting supply opportunities with Vallius Forestry	Legitimate interests	Basic information, Client information,

Providing and developing Vallius Forestry's product and service offering	Legitimate interests, Fulfilment of a contract	Basic information, Customer / Supplier information, Analytics and modelled information, Consents and Prohibitions,
Managing and developing Vallius Forestry's procurement activities and supply chain	Legitimate interests, Fulfilment of a contract	Basic information, Customer / supplier information, Analytics and modelled information
Customer/supplier satisfaction and market surveys	Legitimate interests	Basic information, Customer / Supplier information, Consents and Prohibitions, Analytics and modelled information, Data from websites and electronic notices

The following table provides further information on the different categories of personal data which is referred to in the table above.

<b>Category of personal data</b>	<b>Information content of the category</b>
Basic information	Name and contact details (email, telephone number, addresses) of the natural person (data subject), age, title, position in the company's organization and hierarchy, employment and other connections in business life.
Customer/Supplier information	The information regarding the contractual relation between the customer/supplier and Vallius Forestry, information regarding the legal and other representatives of the customer/supplier and the information regarding the communication between the parties. The customer/supplier identification information required by legislation or credit control or trade or contract management, such as the necessary information to identify the customer/supplier or its representatives and to determine the customer's/supplier's financial status
Consents and prohibitions	The consents and prohibitions given by the data subject for different purposes of processing of personal data.

Customer/Supplier event information	The tasks related to the managing of a customer/supplier relationship and client events as well as the information needed to organise them, such as special diet, allergies and other restrictions
Analytics and modelled information	The information refined or acquired by Vallius Forestry, which are used to improve, execute and govern the business operations, including information gathered through Vallius Forestry's data monitoring systems (including IoT systems) on the actions and omissions by and the skills, performance and preferences of the operators of machines / equipment.
Data from websites and electronic notices	Monitoring the online behaviour of a person in the website or any extranet of Vallius Forestry and monitoring the use of services e.g. by means of cookies. The information collected may include, for example, the browsed page and visited pages of the user, network provider, IP address, location of the user, session ID, time and duration of the session, device model, unique device and/or cookie identifier, device operating system, screen resolution, channel (such as an application, a mobile browser or an internet browser) and the version of the web browser. The information collected from email notices include the reading of the notices, amount of openings, the time of the openings, opened links and the user IP address.

**5 RETENTION PERIOD OR THE CRITERIA USED TO DETERMINE THAT PERIOD**

Necessity for processing personal data will be evaluated on a regular basis and unnecessary data will be deleted. Mainly, personal data will be processed for the duration of the customer or supplier relationship or for as long as the contact person acts in a relevant position in Vallius Forestry's customer's or supplier's company. Personal data may, however, be processed for longer periods if it is necessary in individual cases due to e.g. claims or applicable laws.

## **6 RECIPIENTS OR CATEGORIES OF RECIPIENTS OF PERSONAL DATA**

Subject to applicable laws, personal data may be transferred or disclosed within Vallius Forestry Group to other group companies, some of which may be located outside the European Economic Area ("EEA"). Prior to transferring personal data outside the EEA, the relevant group companies will enter into a data transfer agreement incorporating the EU Commission Standard Contractual Clauses (see further information at EU Commission's [website](#)). Additionally, Vallius Forestry may transfer or disclose personal data to authorities, where required to do so by applicable laws.

## **7 TRANSFERS OF PERSONAL DATA**

The data controller uses subcontractors in the processing of personal data, some of which are located outside the EEA. Where personal data is transferred to subcontractors located outside the EEA, Vallius Forestry will enter into a data transfer agreement incorporating the EU Commission Standard Contractual Clauses with the subcontractor (see further information at EU Commission's [website](#)). In order to ensure the protection and security of data, the controller makes the appropriate contract required by the GDPR with the subcontractors used for processing data.

## **8 SOURCES OF COLLECTING PERSONAL DATA**

Personal data is collected from Vallius Forestry's customers and suppliers and from the data subjects. Personal data may also be collected from public sources, such as Vallius Forestry's customer's or supplier's (or potential customer's or supplier's) websites and similar public sources.

## **9 RIGHTS OF THE DATA SUBJECT**

### **9.1 Right of Access and Data Portability**

The data subject has the right to receive confirmation from the data controller as to whether or not personal data concerning him or her is being processed, or whether personal data has been processed. Where the data controller processes personal data concerning the data subject, the data subject has the right to receive the information contained in this document and a copy of the processed personal data. The controller may charge a reasonable administrative fee for any additional copies requested by the data subject. If the data subject makes the request by electronic, the information shall be provided in a commonly used electronic form, unless otherwise requested by the data subject.

**9.2 Right of Rectification, Right of Erasure and the Right to Object to Processing**

The data subject also has the right to obtain from the controller the rectification or erasure of personal data concerning him or her and the right to prohibit the processing of personal data for direct marketing purposes. In certain cases, the data subject has also the right to request from the controller restriction of processing of personal data or otherwise object to processing.

**9.3 The Right to Withdraw Consent**

In situations where the controller processes personal data of the data subject on the basis of his or her consent, the data subject has the right to withdraw his or her consent. The withdrawal of consent does not affect the legality of the processing that has happened prior to the said withdrawal.

**9.4 The Right to Lodge a Complaint to the Supervisory Authority**

In the case that the data subject finds the processing of his or her personal data unlawful, he or she has the right to lodge a complaint with a supervisory authority.

**9.5 Using the Rights**

All the requests mentioned here shall be provided to the email address:  
[keijo@valliusforestry.com](mailto:keijo@valliusforestry.com).

**10 SECURITY OF PROCESSING**

Only persons within the Vallius Forestry, whose employment tasks include responsibilities relating to the personal data, have access to the data and user rights for adding and modifying the information. Appropriate access control is arranged in the business premises. IT systems and work equipment, such as the computers are protected with password, firewall, regular security updates and SSL / encrypted connections.