

## Haahtela Privacy Policy

This Privacy Policy applies to the customer, subcontractor, user, and marketing registers of companies within the Haahtela Group, maintained to provide Haahtela's services and software products to customers. Additionally, this Privacy Policy applies to the recruitment registers of companies belonging to the Haahtela Group. Please note that this Privacy Policy only applies to the processing of personal data that Haahtela performs as a data controller. Privacy, safety, and data security are important to us. We handle all personal data with appropriate care and in compliance with applicable laws and regulations.

The company within the Haahtela Group that determines the purposes and means of processing personal data and whose customer, subcontractor, user, or marketing register the personal data in question belongs to acts as controller. Regarding recruitment, controller is the company within the Haahtela Group to which personal data is submitted in connection with a job application, i.e., the group company from which the applicant is seeking employment. Principles related to the processing of personal data mentioned in this Privacy Policy apply to all companies within the Haahtela Group, which is hereinafter referred to as "Haahtela" or "we". This Privacy Policy may also refer to a certain company belonging to the Haahtela Group if the mentioned matters apply only to that company. The contact details of each company within the Haahtela Group acting as a data controller are listed below in section 1. Haahtela offers services and software to its customers, collectively referred to as "Services" hereinafter. The information collected from our websites and software is referred to as "Technical Data" hereinafter.

This Privacy Policy describes what personal data we collect about our customers, subcontractors, potential customer representatives, or job applicants ("Data Subject," "you"), how we process it, and how you can exercise your rights as a Data Subject. We may also collect and process personal data concerning users of Haahtela's Services, and the purpose of this Privacy Policy is to inform Data Subjects about the processing of personal data collected in connection with our Services. We collect personal data from our customers' contact persons and users of our Services ("User(s)," "you") when providing our Services. Some of our software may be subject to a separate privacy policy. If a separate privacy policy applies to a particular software, we will publish the policy on our website or otherwise in connection with the software.

We may update this Privacy Policy if necessary due to changes in data processing practices or for other reasons. We will not make significant changes to this Privacy Policy or restrict the rights of Data Subjects under this Privacy Policy without notifying you of such changes.

Haahtela may process certain personal data on behalf of the customer as a data processor in connection with providing Services, in which case the customer is considered the controller. In this case, the customer's privacy policy or other documentation informing Data Subjects about data processing applies to such data processing.

## 1. Contact Information

### Controller's contact information:

Haahtela Ltd, Business ID: 3437749-8

Haahtela-kehitys Ltd, Business ID: 0864430-2

Haahtela-rakennuttaminen Oy, Business ID: 0616996-6

The person responsible for the registers:

Head of Legal Emilia Santasalo, +358 201 101 201, emilia.santasalo@haahtela.fi

Bulevardi 16 B, 00120 Helsinki

## 2. Processed Data

We may process the following personal data about Data Subjects:

- First and last name
- Date of birth
- Organization and title
- Email and other contact information provided by the Data Subject
- Billing and payment information
- Communication between the Data Subject and Haahtela
- Marketing prohibitions and consents
- Recordings from continuous camera surveillance in the server room
- Information related to the use of software by the Data Subject, such as username, activations, and software updates
- Other personal data provided by the Data Subject

Additionally, Haahtela-rakennuttaminen Oy may process the following personal data about Data Subjects:

- Tax number
- Personal identity code and other personal data contained in an ID card or passport, such as a photo, information about nationality and country of residence
- Residence permit
- Working time and access control information for billing verification and filing employee report
- Information about qualifications, competencies, training, and certificates, such as an A1 certificate, occupational safety card, hot work permit, and information about first aid training and driving licenses
- Employment information, such as information about the nature of the employment relationship
- Recordings from restricted on-site photography and videography

Furthermore, our recruitment register may contain the following information about job applicants:

- Details about a Data Subject's job of interest
- Information about education, work experience, language skills, qualifications, competencies, and positions of trust
- Photograph of the job applicant
- Information related to job interviews

- Information related to personality and suitability tests and other assessments
- Possible communication related to the job application
- Any other information provided by the job applicant, such as salary expectations
- Information related to the processing and status of the job application

Technical Data on our websites and software:

- Location data (country information only)
- IP address
- Browser-related information
- Identifier of the Data Subject's device
- Activation numbers
- Log data
- Other technical data related to the Data Subject's use of software

### 3. Where Do We Get the Personal Data?

Primarily, we obtain the personal data processed under this Privacy Policy from the Data Subjects themselves or their employer. We may also receive information related to the processing and status of job applications from our subcontractors handling the recruitment process. Some personal data may be collected from public and private registers and competent authorities.

Additionally, we collect two types of information from Users: (i) user data from our software; and (ii) Technical Data from our websites and software. Although we do not typically use Technical Data to identify individuals, sometimes individuals may be identifiable from it either alone or when combined with or linked to user data. In these cases, Technical Data may also be considered personal data as defined by applicable legislation, and we treat combined data as personal data.

Limited photo and video recording may be conducted on Haahtela Rakennuttaminen Oy's construction sites, during which personal data is recorded as photo and video material. Information about the recording and its timing is provided on the construction site. Photo and video recording on the construction site is not constant.

Haahtela's server rooms have continuous recording camera surveillance. Notification of video surveillance is provided at the recording location. Additionally, we may receive personal data when we combine, supplement, and analyze other available data.

### 4. Purposes and Legal Basis for Data Processing

#### Purpose of Processing

Haahtela processes personal data for several purposes. We process personal data to manage our customer relationships, facilitate transactions and payments, conduct recruitment, and manage and analyze our Services and customer service.

Haahtela processes personal data for the following purposes:

- To fulfil contractual rights and obligations  
We process personal data to fulfil our contractual obligations towards the Haahtela subcontractor or customer company represented by the Data Subject.
- To provide our Services  
We process personal data to provide Services to our customers and Users and to conduct, maintain, and develop our business. We may use data, for example, for essential functions of the software and to provide access to the software. If the Data Subject or User contacts our customer service, we use the provided information to respond to inquiries and resolve any issues.
- To fulfil legal obligations  
We process certain personal data, such as residence permits and tax numbers, to fulfil our legal obligations. Additionally, we may process personal data if required by law.
- Communication between Haahtela and Data Subject  
We process personal data for contacting Data Subjects regarding matters related to the Services we offer to our customers or services provided by our subcontractors to us, and to inform Data Subjects about changes to the Services we offer.
- For marketing and customer communication  
We process personal data to market and offer Services to our customers, potential customers, and their representatives, and to conduct, maintain, and develop our business. We may use data, for example, to provide essential functions of the software and to provide access to the software.
- To improve quality and analyze development trends  
We process information related to the use of software to improve the quality of the software, for example, by analyzing various development trends related to the use of the software. Whenever possible, we use only data that cannot be used to identify individuals for this purpose.
- To protect property and ensure security  
The purpose of collecting and processing personal data contained in camera recordings on construction sites is to protect property, ensure and enhance the safety of individuals working and visiting the site, investigate situations that threaten safety, and monitor different work phases and their progress on the site. The purpose of collecting and processing personal data contained in recordings from continuous camera surveillance in the server room is to ensure and enhance employee safety, protect property, prevent crimes, and investigate any crimes that have occurred.
- To conduct recruitment  
We process the personal data of job applicants to conduct recruitment, communicate about recruitment, compile statistics, and make contact.

## Legal Basis for Processing

We process personal data to fulfil contractual obligations towards our customers and subcontractors. In the context of recruitment, the primary legal basis for processing personal data is the preparation of a contract between us and the job applicant. When a job applicant applies for a position with us, the processing of

personal data is necessary to carry out pre-contractual measures at the request of the jobseeker. We must retain and process certain information collected during the recruitment process to objectively justify the decisions made during the recruitment process.

We also process personal data when necessary to fulfil our legal obligations. Additionally, we process personal data based on our legitimate interest. Our legitimate interest is based on conducting, maintaining, and developing our business, creating and maintaining customer and cooperation relationships, and defending against legal claims. When we process your personal data based on our legitimate interest, we balance our legitimate interests against your right to privacy. Occasionally, we may request your consent for the processing of personal data. In these cases, you can withdraw your consent at any time.

## 5. Retention Period

We retain personal data only as long as necessary to fulfill the purposes of data processing. The retention period depends on the nature of the data and the purpose of processing, so the retention period may vary on a case-by-case basis.

We retain most of the personal data under this Privacy Policy as long as necessary to fulfil our legal obligations or accounting obligations. Such data includes, among others, the Data Subject's name, personal identification number, contact details, and billing and payment information. We retain some personal data, such as the Data Subject's name, contact details, and billing and payment information, as long as necessary to defend against potential legal claims.

We generally retain other personal data of any Data Subject using our Services as long as the Data Subject uses our Services or as long as we have another reason to retain the data, for example, for internal reporting purposes. Generally, personal data related to the use of our Services by the Data Subject is deleted within a reasonable time after the Data Subject has ceased using all of our Services or when the Data Subject requests the deletion of their personal data.

We delete the personal data of job applicants one year after the decision related to the recruitment in question.

## 6. Data Transfer from European Economic Area

The personal data processed under this Privacy Policy is generally not transferred outside the European Union ("EU") or the European Economic Area ("EEA"), and we store your data within the EU or EEA.

However, we reserve the right to use service providers located outside the EU or EEA in the future. In such situations, we commit to taking measures to ensure that the level of protection for your personal data is adequate in the jurisdictions where your personal data is processed. We arrange adequate protection for the transfer of personal data to countries outside the EU or EEA through agreements with our service providers based on the European Commission's approved standard contractual clauses or other similar arrangements.

You can request more information regarding the transfer of personal data by contacting us using the contact details provided above.

## 7. Categories of Personal Data Recipients

We share personal data within the Haahtela organization only and to the extent necessary to provide and develop services and software products. We do not disclose your personal data to parties outside our organization, except in the following situations:

- Sharing is necessary for the purposes outlined in this Privacy Policy  
To the extent that third parties need access to personal data to perform services, Haahtela has ensured appropriate contractual and organizational measures to ensure that personal data is processed solely for the purposes mentioned in this Privacy Policy and in accordance with applicable laws and regulations.
- For legal reasons  
We may disclose personal data to parties outside our organization if access to personal data is reasonably necessary (i) to comply with any applicable law, regulation, and/or court order; (ii) to detect, prevent, or otherwise address fraud, money laundering, financing of terrorism, or security or technical issues; or (iii) to protect, defend, or ensure the safety of Haahtela, our customers, or Users, or to protect the public interest in accordance with the law. If possible, we will inform Users of such transfer and processing.
- To authorized service providers  
We may disclose personal data to authorized service providers performing services for us, including subcontractors providing data storage, sales, marketing, and customer support services, and for recruitment, our human resources system provider. In accordance with the commitments included in our agreements with our service providers, the service providers commit to complying with at least the privacy and data security standards set forth in this Privacy Policy. Remember that when you disclose your personal data directly to a third party, for example, through a link on our website, the processing of personal data is usually based on the third party's own documentation and standards.
- For other legitimate reasons  
If Haahtela is involved in a merger, business acquisition, or other corporate transaction, we may disclose personal data to a third party involved in the transaction. In such cases, we ensure that all personal data remains confidential. In this case, we will inform the Data Subjects whose personal data is transferred as soon as reasonably possible.
- With your explicit consent  
We may disclose personal data to third parties outside the Haahtela organization for reasons other than those mentioned above when we have the explicit consent of the Data Subject. The Data Subject has the right to withdraw such consent at any time.

## 8. Rights of the Data Subject

- Right to access personal data  
You have the right to access the personal data we process about you. If you wish, you can contact us to find out what personal data we process and for what purpose this data is used.
- Right to withdraw consent  
If processing is based on your consent, you can withdraw your consent at any time. Withdrawing consent does not affect the lawfulness of processing based on consent before its withdrawal.

- Right to rectification  
You have the right to obtain that we correct or complete any incorrect or outdated personal data we hold. By contacting us, you can update, for example, your contact details or other personal data.
- Right to erasure  
You can obtain that we delete your personal data. We will take the actions requested unless we have a legitimate reason not to delete the data.
- Right to object  
The Data Subject can object to the processing of their personal data if the data is processed based on our legitimate interest or for purposes other than those mentioned in this Privacy Policy. If we do not have a legitimate reason to continue processing the data, we will stop processing your personal data after your objection.
- Right to restriction of processing  
You can request that we restrict the processing of your personal data, for example, when your request for deletion, correction, or objection is being processed and/or when we do not have legitimate grounds to process your data.
- Right to data portability  
You have the right to receive your personal data from us in a structured and commonly used format and to independently transfer the data to a third party.
- Exercising rights  
If you wish to exercise any of the above rights, please send us the following information by post or email: full name, address, phone number, and a copy of a valid ID. We may request additional information necessary to verify your identity. We may reject requests that are unreasonably repetitive, excessive, or clearly unfounded.

## 9. Direct Marketing

Regardless of any prior consent given for direct marketing, the User has the right to prohibit us from using the User's personal data for direct marketing, market research, and profiling for direct marketing purposes by contacting us using the contact details provided above or by using the software functions or the unsubscribe option provided in direct marketing messages.

## 10. Data Security

We use administrative, organizational, technical, and physical safeguards to protect the personal data we collect and process. The measures we use include data encryption, passwords, firewalls, secure facilities, and systems protected with restricted access rights. Our security measures are designed to maintain an appropriate level of data confidentiality, integrity, availability, recoverability, and resilience. We regularly test our systems and other hardware for vulnerabilities.

If a data security breach occurs despite our security measures, which is likely to have adverse effects on the privacy of Data Subjects, we will notify the relevant Data Subjects and other affected parties, as well as the authorities if required by applicable data protection legislation, as soon as possible.

## 11. Filing a Complaint

You have the right to file a complaint with the supervisory authority if you believe that Haahtela's processing of personal data is in violation of data protection legislation.

Last updated: 2 January 2025