

STALATUBE GROUP PRIVACY NOTICE – CUSTOMER RELATIONS, SALES, MARKETING, VENDOR AND SUPPLIER MANAGEMENT

The purpose of this privacy notice is to give you information regarding how we at Stalatube Group process personal data in customer relationship management, sales and marketing activities. This privacy notice also provides information how we manage contact data of our subcontractors' and suppliers' representatives relating to e.g. sourcing and purchasing activities. Each Stalatube Group company is responsible for the processing of personal data in its own activities for the purposes and on legal bases set out in this notice and may use the necessary personal data collected by other group companies for the same purposes.

Stalatube Group is fully committed to protecting your personal data when using or processing them and recognize the importance of correct and lawful treatment of personal data. This privacy notice describes how we process personal data in accordance with the EU's general data protection regulation ("GDPR"). Information may be supplemented by specific privacy notices and additional local documentation. Any mandatory national laws or regulations will take precedence in the event that it conflicts and has stricter requirements than this notice.

If you have any questions related personal data processing and/or this notice, please contact marketing@stalatube.com.

1. Controller and contact details in privacy matters

As a data subject you may contact Stalatube in all privacy matters using following contact information:

Stalatube Oy (business ID 1568544-4)
Taivalkatu 7
15170 Lahti
Finland

Tel. +358 3 882 190
marketing@stalatube.com

2. For what purpose is your personal information collected?

We collect information related to our business customers, leads and co-operation partners. When performing sales, marketing or customer relationship management activities, we process personal data of contact persons or decision makers of our customers, leads and partners. We also process personal data in order to facilitate Stalatube Group's sourcing, purchasing, invoice handling and contract management activities. The processing of personal data is based on an agreement, legitimate interest of Stalatube Group and your consent (e.g. related to the cookies). Stalatube uses cookies to provide the best user experience, to analyze traffic, and to provide users relevant content and information. For more information, please view Cookie Notice. The information is processed to fulfill our agreement with you, GDPR 6 (1) (b) if you are an individual

or a sole trader, and legitimate interest, GDPR 6 (1) (f) if you are an employee or representative of a company. Our legitimate interest in such a case is to fulfill our contractual obligations towards our customer/partner/your employer and to ensure effective communication incl. marketing.

In other cases, we may also need to process personal data based on our legal obligations. For example, we may need to process information about payment history, transactions and other relevant material to comply with our legal obligations under the applicable local accounting laws.

We process personal data on:

- contractual necessity, e.g. in case of
 - o entering and performing business contracts with you and delivering services and products
 - o customer communication
 - o to issue and process invoices and payments
- legitimate interest, e.g. in case of
 - o entering into and performing business contracts the company you represent and to issue and process invoices and payments
 - o engaging with other business partners
 - o to manage, develop, analyze and create statistics of relationship between Stalatable and customers and business partners
 - o vendor and supplier management
 - o conduction stakeholder surveys such as supplier sustainability questionnaires
 - o collecting customer feedback
 - o lead generation, direct marketing, marketing Stalatable's products and services
 - o to maintain good health and safety practices
 - o debt collection
 - o detecting and preventing fraud, misconduct, infringements or other violations of legal rights and obligations.

3. What type of information is collected about you?

We may process following information on decision makers and contact persons of our customers, leads, vendors and co-operation partners (incl. newsletter subscribers, individuals who have requested a quote or submitted a contact request, participants of events and respondents of questionnaires):

- person's name, title, company/employer and contact information (e.g. email address, phone number).
- information about individual's duties and position in business life or a public office
- customer history (e.g. participation in the events)
- direct marketing permissions and/or prohibitions
- possible other information relevant for the business relationship.

4. Where do we collect personal data from?

Personal data is collected from you by phone, in meetings, or by other equivalent means. Data is also collected in connection with the conclusion of the customer or business agreement and otherwise obtained during customer or business relationship. Personal data may also be originated from representatives of Stalatube based on their business interactions with individuals or collected and updated from public and private registers.

5. Who do we share your personal information and may information be transferred outside the EU or EEA?

Each Stalatube Group company is responsible for the processing of personal data in its own activities for the purposes and on legal bases set out in this notice and may use the necessary personal data collected by other group companies for the same purposes.

Unless you prohibit the disclosure of your data, we may disclose data i.e. to selected collaboration partners within the limits of the legislation for providing services.

We use services of external service providers for, e.g.,

- maintaining customer and co-operation partner information
- maintaining newsletter mailing lists
- processing information of individuals participating in events
- performing customer feedback surveys
- conducting stakeholder surveys
- measuring corporate responsibility and sustainability in order to meet sustainability requirements.

In accordance with data protection agreements, each service provider can only process personal data to the extent that is necessary for the provision of the service in question.

Stalatube may transfer data outside the EEA in case it is necessary for the purposes of the processing of personal data described above or for the technical implementation of the processing. The level of data

protection outside the EEA may be lower than in the EU. In the absence of the adequacy decision, Stalatable will take appropriate safeguards to ensure the protection of your personal data such as the standard contractual clauses for international transfers approved by the European Union ("SCCs"), binding corporate rules or Data Privacy Framework. SCCs available: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en

6. How your personal information is protected and how long we process information?

The information is collected in databases that are protected by firewalls, passwords and other technical means. The servers are stored in locked facilities accessible only to internal employees or those of service providers. Access to the information is restricted to persons employed by the Stalatable Group or authorized agents who need the information in their work. The information in the register is backed up in a safe way and can be restored if necessary.

We store personal data for as long as it is necessary due to the purpose of use (e.g. customer or business relationship), or as long as the individual requests the erasure of the data. In this case we will store the data that is required or authorized by law us to store and the data about the erasure.

We assess the necessity of retaining data regularly. In addition, we take care of such reasonable measures which ensure that no incompatible, outdated or inaccurate personal data, taking into account the purpose of the processing, are stored in our registers.

7. What are your rights as a data subject?

You can contact us if you have any questions related to personal data processing. As a data subject, you have the following rights in relation to the processing of personal data under the GDPR.

Right to be informed about the processing of your personal data and to inspect the personal data concerning you

You have the right to be informed about the processing of your personal data. We aim to provide a comprehensive overview of how we process personal data through descriptions of our privacy practices, such as privacy notices. In addition, you always have the right to ask further specific questions about the processing of your personal data.

You have the right to receive confirmation of whether we process your personal data or not. In cases where we process your personal data, you also have the right to receive a copy of the processed personal data.

Right to rectification

You have the right to rectify any incorrect personal data concerning you and the right to request us to complete incomplete personal data. If we correct personal data on the basis of your request, we will, where possible, also notify the correction to all parties to whom the incorrect data was previously disclosed, in accordance with the GDPR.

Withdrawal of a consent

When processing of information is subject to your consent, you may withdraw your consent at any time. Withdrawing your consent does not affect the lawfulness of processing before the withdrawal of the consent.

Right to erasure

You can request the erasure of your personal data in accordance with the GDPR, for example if your data has been used unlawfully or is no longer needed. However, there is no right to erasure, for example, if the processing is based on a law or if the data are necessary for the establishment, exercise or defence of legal claims. The controller may refuse erasure on the grounds provided for by law.

Right to object the processing and direct marketing prohibition

For specific reasons relating to your personal situation, you also have the right to object to processing of your personal data. When making a request, you should identify the specific situation on the basis of which you object to the processing. In this case, we may no longer process your personal data unless there is a substantial and legitimate ground for the processing which overrides your interests, rights and freedoms, or the processing is necessary for the establishment, exercise or defence of legal claims. We may refuse to comply with a request to object on the grounds provided by law. Direct marketing may always be refused without justification.

Right to restrict personal data processing

If you believe that we are processing your personal data unlawfully, if it is inaccurate or if you have objected to the processing of your data, you can ask us to restrict the processing of your personal data in accordance with the GDPR. In this case, we may only process the data in limited circumstances, such as with your consent; to establish, exercise or defend a legal claim; in the public interest; to protect another person. In the event of a restriction of data, we will, where possible, inform all those to whom the data have previously been disclosed of the restriction, in accordance with the law.

Right to data portability

In some cases, you have the right to receive your personal data from us in a structured, commonly used, and machine-readable format, and, where technically feasible, to have your personal data transmitted to another company ("data portability"). This applies to personal data that you have provided to us in a structured, commonly used, and machine-readable format, if the processing of your personal data is automated, and the legal basis for the processing is the fulfillment of a contract or your consent. The data portability must not adversely affect the rights and freedoms of third parties.

Right to lodge a complaint with a supervisory authority

If you consider that the processing of personal data relating to you infringes the data protection regulation, you have the right to lodge a complaint with a supervisory authority. You may lodge your complaint in the EU Member State of your habitual residence, place of work or place of the alleged infringement.

15.11.2024

8. Whom can you contact?

If you have any questions related to the personal data processing or you want to exercise your abovementioned rights, please contact marketing@stalatube.com.

9. Updates to privacy notice

We drive to develop continuously our business and data protection tools and reserve the right to amend this privacy notice. When required by applicable laws we may contact you in order to provide information about updates or changes that have effects on you.

Updated 15 November 2024.