

PRIVACY POLICY: HARTWALL LTD'S CUSTOMER AND CONSUMER REGISTER

1. CONTROLLER

Hartwall Ltd (hereinafter referred to as "Hartwall")

Business ID: 0213454-7

Address: Hiomotie 32, PO Box 200, 00371 Helsinki

2. CONTACT DETAILS FOR MATTERS CONCERNING THE DATA FILE

kuluttajapalvelu@hartwall.fi

3. NAME OF THE DATA FILE

Hartwall's customer and consumer register

4. PURPOSE OF AND BASIS FOR PROCESSING PERSONAL DATA

The primary basis for processing personal data is the relationship between the customer and Hartwall. The personal data is processed as required by Hartwall's business operations, for example in order to deliver the products ordered by the customer, provide services or fulfil another kind of contract.

Personal data is also processed if the processing is necessary for pursuing the legitimate interests of Hartwall. The explicit consent of the data subject may be requested for data processing in some instances, for example in connection with various campaigns. Hartwall may combine personal data in order to provide good service.

Personal data may be processed for the following purposes:

- The performance, implementation, development and monitoring of customer relationships, customer service and related communications and marketing.
- Analysing, grouping and reporting customer relationships as well as purposes related to the development of Hartwall's business operations.
- Collecting and processing customer feedback and customer satisfaction data.
- Conducting market research and surveys.
- The profiling purposes described in more detail in section 10 of this description of file.
- Processing may be outsourced to companies affiliated with Hartwall and/or outside service providers in accordance with the legislation on data protection and within the limits set by it.

More information about the purposes of data processing by sector:

- For online and mobile services, data is processed so that the data subject may be identified and also in order to offer online services or to fulfil a contract, such as delivering an order.
- For customer service, data is used to offer customer service, such as replying to feedback or a complaint, carrying out customer communications and resolving disputes.
- For communications, personal data is processed to target communications and marketing based on the interests expressed by the data subject or on data collected by other means. Marketing can be targeted at different groups that have been formed on the basis of personal data.
- For marketing, personal data can be used to promote the products and services of Hartwall. Hartwall may also use personal data for marketing and opinion surveys in order to develop products and services.
- Hartwall may also use personal data for the purposes of analysis, statistics and reporting as well as for developing its business operations, such as products and services. This kind of processing is based on a contract, on the legitimate interests of Hartwall or on consent requests. For example, the direct marketing targeted at consumers is always based on their given consent that can be withdrawn at any time.

5. COLLECTION OF PERSONAL DATA AND THE PRIMARY SOURCES OF PERSONAL DATA

Personal data is primarily collected from the following sources:

- Personal data is collected from the data subject themselves on instances related to customership, the use of services, communications and the data subject's dealings with Hartwall. Data on data subjects is collected, for example, when they
 - register to use the online shop
 - give Hartwall marketing permission and receive communications based on it
 - make purchases in Hartwall's online shop or use other online or mobile services
 - give feedback, submit a contact request or contact Hartwall in other ways
 - are the contact person for one of Hartwall's corporate clients or another stakeholder or are in contact with us as a representative of their organisation, or
 - share, publish, comment or send messages through Hartwall's social media channels when they require customer service. Hartwall also monitors social media on a general level to find out what is being said about Hartwall and the industry.

- Personal data may also be collected from parties providing identification, verification, address, updating, credit scoring or other equivalent services.
- In addition, personal data may be obtained from the Population Information System of the Population Register Centre and from other known systems.
- Personal data may also be collected from Hartwall's other personal data registers, such as Hartwall's personnel register.
- Personal data may also be obtained from Hartwall's partners on the basis of a contract.

6. DATA CONTENT OF THE FILE

The processed data varies depending on what services the data subject uses and how they use them. Some data is obtained directly from the data subject, for example in connection with the use of the online shop. Some of the data is obtained using cookies or other comparable techniques.

The kinds of data that may be recorded about the data subject include the following:

- Name, calling name, personal identity code, customer ID, gender, language spoken, address, telephone number, email address and other similar necessary information.
- Demographic data such as age and/or birthdate, legal guardian and ward, language and country.
- Service usage and purchase data as well as data related to the implementation of marketing and communications through various channels, such as online and vending machine services, including the recording of customer service calls.
- Content produced by the data subjects themselves, such as customer feedback as well as the additional information provided by the data subject, such as wishes related to customership, satisfaction information, interests, information on hobbies or other comparable data. Data is collected from received newsletters (for example, was the message opened) and other activities. Data concerning health may be processed in connection with certain complaints to establish whether Hartwall is liable.
- The services requested and used by the data subject along with payment information. Information such as payment method data as well as billing information, if the data subject chooses to pay for the products by invoice.
- The role of the client company or organisation's contact person in the organisation in question as well as the name and contact details of the organisation in cases where the contact person deals with Hartwall as a representative of a company or another kind of organisation or stakeholder. In

addition to this, other data necessary for the relationship between Hartwall and the represented company or another organisation may be collected.

- Campaign information on those participating in marketing campaigns. When an individual takes part in, for example, a prize draw or a competition, data provided in connection to this as well as data on the participation in the campaign is collected.
- The bans, restrictions, consents and other choices submitted by the data subject such as data on marketing permissions as well as marketing opt-outs.
- Other data related to customership, for example the data collected on visits to the website that can be connected to the customer, such as the user's IP address, time of the visit, visited pages, the browser used (e.g. Internet Explorer, Firefox), the web address the user came from as well as the server the user came from.
- Data necessary for using identification and verification tools and services.
- Information related to data processing, such as recording date and data source.
- Videos recorded and photographs taken at Hartwall's events. If only one person is being photographed, Hartwall will always seek consent before publishing the photograph. For security reasons, video material is also recorded of persons visiting Hartwall's premises.

7. PERSONAL DATA STORAGE PERIOD

Hartwall stores personal data in the customer and consumer register as long as it is necessary for achieving the purposes described in this description of file.

More information about the storage of data by sector

The function the storage period applies to:	Personal data storage period:
A single purchase from the online shop or another order	Until the order has been delivered, the time limit for making a complaint has been exceeded, the information is not needed for monitoring the service or quality and there is no reason to expect that the customer will contact Hartwall about a matter related to the order.
Customer feedback, complaints or other customer service	Until the time limit for making a complaint has been exceeded, the requirements for food safety own-checks have been met, the feedback has been processed, it has been established whether Hartwall is liable and the matter has been settled.

Marketing communications	Until the marketing permission and/or newsletter subscription has been cancelled.
A response to a survey or competition campaign	Until the survey or competition has closed and the purpose of the survey/competition has been fulfilled or at the latest when a calendar year has passed since the survey/competition was organised.
Processing of the personal data of representatives of companies, organisations or stakeholders	Until Hartwall no longer requires the personal data for achieving the purpose for which the data was collected or until we have been informed that the person no longer performs the tasks in the company/organisation that the processing is based on.

Regardless of what has been stated above on the storage periods of personal data, Hartwall may have a statutory obligation to process certain personal data (such as online shop transaction data, in order to comply with accounting legislation) for longer than the stated period. In these cases, personal data is only processed in order to comply with the legislation.

Furthermore, Hartwall may process personal data in an anonymised form also after the processing period for the purposes of analysis and statistics as well as for the purpose of developing its business operations.

8. STANDARD DISCLOSURE OF DATA AND TRANSFER OF DATA OUTSIDE THE EUROPEAN UNION OR THE EUROPEAN ECONOMIC AREA

Hartwall may disclose personal data to, for example, the authorities if the legislation obliges it to disclose the data.

Personal data will not be disclosed to parties outside those taking part in the production, development or maintenance of Hartwall's services and communications, or the services or communications working for Hartwall, unless it is disclosed on the basis of a contract, separate consent or particular statutes. The third parties who Hartwall may disclose personal data to in order to fulfil the contract include partners providing payment transmission or transport services to the online shop.

Hartwall may use services provided by third parties for the processing of personal data, in which cases personal data is disclosed for the purposes specified by Hartwall.

Personal data may be transferred outside the European Union or the European Economic Area only in accordance with the data protection legislation and within the limits set by it, given that the conditions laid down in the EU General Data Protection Regulation are met. This may mean measures such as carrying out the transfer using the model clauses approved by the European Commission.

9. PRINCIPLES OF DATA PROTECTION

The information system and files are protected with the usual technical protection methods used in business operations. Personal data is kept confidential, and data protection and the protection level of processing is ensured through the necessary measures.

Personal data may only be accessed by employees or partners who have the right to access the data and are obliged to comply with the related secrecy provisions. Hartwall employees have different levels of access to the data that are sufficient for carrying out tasks but as limited as possible.

Any manual materials will be kept in a locked storage space that can only be accessed by persons who have been granted separate permission to do so.

10. PROFILING

As part of the processing of personal data stored in the register, Hartwall may also use the data for profiling purposes. The purpose of profiling is to examine customer behaviour and demand for services.

11. THE DATA SUBJECT'S RIGHT TO OBJECT TO DIRECT MARKETING AND THE PROCESSING OF PERSONAL DATA (THE RIGHT TO OPT OUT)

The data subject has a right, related to their own particular situation, to object to profiling and other processing of personal data by Hartwall where the processing is based on the relationship between Hartwall and the data subject. The data subject may raise their objections as per section 13 of this description of file. While raising the objection, the data subject must specify the particular situation on grounds of which they object to the processing. Hartwall may reject the objection on statutory grounds.

The data subject may give consents or opt out of direct marketing in a channel-specific manner, including profiling for the purposes of direct marketing.

12. OTHER RIGHTS OF THE DATA SUBJECT RELATED TO PERSONAL DATA PROCESSING

12.1 The data subject has a right to access the data (right of access)

The data subject has a right to access the data that has been collected concerning them. The data subject may request access as per section 13 of this description of file. The right of access may be refused on statutory grounds. Exercising the right of access is, as a rule, free of charge.

The data subject also has the right to request Hartwall to restrict the processing of their personal data in situations such as when the data subject is waiting for a response to a request to have their data rectified or erased.

12.2 The data subject's right to data portability

The data subject has a right to receive in a machine-readable format and to transmit to another controller the data provided by the data subject that is processed on the basis of an assignment or consent given by the data subject.

12.3 Other rights

If personal data is processed on the basis of consent, the data subject has a right to withdraw consent by notifying Hartwall as per section 13 of this description of file. The data subject has a right to withdraw consent at any time without it affecting the lawfulness of the consent-based processing carried out prior to the withdrawal of consent.

The data subject has a right to lodge a complaint with a supervisory authority if Hartwall has not complied with the applicable data protection regulations in its operations.

13. CONTACT US

For all questions related to personal data processing and situations related to the exercise of data subjects' rights, data subjects are asked to contact Hartwall by email at kuluttajapalvelu@hartwall.fi or by post: Hartwall Ltd/Consumer Service, Hiomotie 32, PO Box 200, 00371 Helsinki If necessary, Hartwall may ask the data subject to clarify their request in writing, and the identity of the data subject may need to be verified before further action is taken.