

Privacy policy for Romu Keinänen Oy's customer register

A privacy policy in accordance with personal data legislation (part. Personal Data Act, 523/1990, Sections 10 and 24).

(Policy created 1/3/2018)

1. Controller of the register

Romu Keinänen Oy (hereinafter "Romu")

Business ID: 1635143-8

Mänkimiehentie 13, 02780 Espoo

Phone: 0201 443 685

2. Person handling register-related issues:

Pia Pitkänen

c/o Romu Keinänen Oy

Phone: +358 201 443 685

Email: hallinto@romukeinanen.fi

3. Name of the register

Customer Register based on Romu Keinänen's customer accounts and other appropriate matters.

4. Intended use of personal data

Personal is processed for the **payment of scrap purchases, official requests of annual purchases**, handling and analysing customer accounts and other appropriate matters, producing and personalising services, development and design of business, as well as marketing, remote sales, opinion and market surveys and customer communications, which may also be carried out electronically or in a targeted manner.

Personal data may be processed within the scope allowed by applicable legislation for the marketing purposes of companies belonging to the Romu Group, or partners that have been selected by Romu; such marketing purposes include direct marketing, remote sales and opinion as well as market surveys. The disclosure of personal data to partners may, in principle, only occur for such purposes that support the operating principle of the register, and where the intended use of such data is not incompatible with Romu's intended uses.

Romu may use the location details of a user's terminal device for all of the purposes indicated above in this paragraph, however in principle to offer service based on the user's location or to enable an internal analysis concerning the user's activities, subject to the fact that the user has expressly provided Romu with consent to use location details, or if consent to use location details is unambiguously indicated in context of the user with Romu, or if details concerning location are anonymous. Users may revoke their consent at any time by removing the cookie history of their own browser.

General requirement for the processing of personal data: Points 1, 2, 5, 6 and 7 of Section 8 Subsection 1 of the Personal Data Act.

5. Data content of the register

The following details in the register can be processed for all registrees:

- first and last name
- contact details (postal address, phone number, email address)
- start and end date, as well as method of a customer account and/or appropriate contact
- gender
- end part of social security number
- change details of data specified above

In addition to the data listed above, the following details in the register can be processed for those who have purchased a product and/or service:

- customer number
- social security number
- invoicing and collection details

6. Regular data sources

Personal data concerning registrees is collected directly from the registrees.

7. Disclosure and transfer of data

On the basis of the register controller's consideration, data can be disclosed within the scope and requirements of valid legislation, for example, to Romu's partners, unless the registree has denied the disclosure of data. The disclosure of personal data may, in principle, only occur for such purposes that support the operating principle of Romu's customer register, and where the intended use of such data is not incompatible with Romu's intended uses.

Data may also be disclosed in a manner required by the requirements of competent authorities or other parties, based on valid legislation, as well as for historical or scientific research, provided that the data has been transformed in to an unidentifiable format.

Data may be disclosed to buyers in connection with corporate acquisitions, if Romu sells or organises its business operations.

Data may be transferred to register controller-selected partners that process data on behalf of the register controller, on the basis of a cooperation agreement concluded between the parties. In this case, the data processor does not have the right to process the transferred data for its own purposes, in its own personal registers.

In principle, data is not transferred outside the European Union's member states or outside the European Economic Area, unless it is necessary for the purposes of personal data processing indicated above or for the technical implementation of data processing, in which case the requirements of the Personal Data Act shall be observed in the transfer of data.

Romu may transfer data contained in the register to its own direct marketing registers after the conclusion of customer accounts or appropriate matters.

8. Protection of the register

The data included in the register that is electronically processed is protected by means of firewalls, passwords and other technical methods that are generally accepted in the data security sector. Manually maintained documentation is located in premises to which access is prohibited to unauthorised persons.

Only the identified register controller and employees of companies that have been assigned and are working on behalf of the register controller, have access

to the data contained in the register after being granted user rights by the register controller.

9. Right to review, deny and amend

Registrees have the right to review, in accordance with the Personal Data Act, what personal data has been stored in the register. At the request of the registree, we shall perform the necessary amendments and supplements to the personal data or we shall remove the data that is incorrect, unnecessary, incomplete or outdated in terms of the purpose of processing. The review and update of data takes place by contacting our customer service. The request must be in writing and must be signed.

Registrees have the right to deny the processing of data concerning them as well as the disclosure for direct marketing, remote sales and other direct marketing, as well as market and opinion survey purposes, by contacting our customer service.

10. Amending the privacy policy

Romu continuously develops its business operations and, therefore, reserves the right to amend this privacy policy by informing its intentions in services. Changes may also be based on amendments to legislation. Romu recommends that registrees regularly review the content of the privacy policy.