

Privacy Statement for the Customer Register of Romu Keinänen Oy

*Privacy Statement under the personal data legislation
(esp. Personal Data Act, 523/1999, sections 10 and 24).*

(The statement has been drafted on 1 March 2018 and most recently updated on 28 March 2024)

1. Controller

Romu Keinänen Oy (hereinafter "Romu")
Business ID: 1635143-8
Mänkimiehentie 13, FI-02780 Espoo
Telephone: +358 (0)201 443 685

2. The person in charge of the register

Jouko Komulainen
c/o Romu Keinänen Oy
Telephone: +358 (0)201 443 685
Email: hallinto@romukeinanen.fi

3. Register name

Customer Register based on custom or other professional connection with Romu Keinänen Oy.

4. Purpose for processing personal data

Personal data is processed for the performance of commissioned services, payment for scrap purchases, the performance and management of vehicle scrapping, the handling and analysis of requests for information from public authorities and insurance companies and other relevant contacts, the provision and personalisation of services, business development and planning, marketing, direct sales, opinion and market research and customer communications, which may also be carried out electronically and in a targeted manner.

Personal data may be processed as provided for by applicable law for marketing purposes, including direct marketing, direct selling, distance selling and opinion and market research, by companies belonging to the Romu Group and by carefully selected partners of Romu. In principle, data may only be disclosed to partners to support the purpose of the register and for purposes that are not incompatible with those of Romu.

Romu may use the location data of the data subject's device for any of the purposes set out in this paragraph, but as a general rule to provide location-based services to the data subject or to enable internal analysis of data subject activity, provided that the data subject has given Romu express consent to use the location data or that the consent to use the location data is unambiguously apparent from the context of the data subject's relationship with Romu or that the location data is

anonymous. The data subject may withdraw their consent at any time by deleting their browser cookie history.

Legal basis for processing personal data

Romu processes personal data to fulfil a commitment or contract for a service or product and on the basis of your consent (e.g. for marketing purposes). You always have the right to cancel your consent and prohibit direct marketing. Romu processes personal data also on the basis of legitimate interest. Legitimate interest applies as the basis when, for example, we send direct marketing material based on an existing customer relationship and when we conduct a credit check or investigate a violation. In addition, Romu processes personal data to fulfil legal obligations, for example, to comply with government regulations on vehicle scrapping or accounting rules.

Storage time for personal data

Your personal data will only be stored for as long as necessary for purposes defined in this statement.

5. Data in the register

The register can process the following data of all data subjects:

- first and last name
- contact details (postal address, phone number, email address)
- beginning and end date and method of connecting of custom or professional connection
- gender
- the last few characters of the personal identity code
- change log to the data identified above

In addition to the above, the register may process the following information about the purchasers of the product and/or service:

- customer number
- personal identity code
- invoicing and collecting data

The register also collects personal data of participants in events and other activities. Depending on the event, in addition to the above, allergy information and any other information necessary for participation in the event will be collected in the register.

6. Regular data sources

Personal data concerning the data subject is collected from the data subject themselves.

7. Disclosure and transfer of data

The data may, at the discretion of the controller, be disclosed to the extent permitted and required by applicable law, for example to partners of Romu, unless the data subject has prohibited the disclosure. In principle, data may only be disclosed for purposes that support the purpose of Romu's customer register and where the purpose for which the data is used is not incompatible with Romu's purposes.

The data may also be disclosed in accordance with the requirements of the competent authorities or other bodies, on the basis of the legislation in force, and for historical or scientific research, provided that the data have been anonymised.

The data can be disclosed to buyers in connection with a conversion of companies, if Romu sells or otherwise re-organises its business operations. The data can be transferred to partners selected by the controller, who process data for the controller, based on a collaboration contract. In such a case, the data processor does not have the right to process the transferred data on its own account, in its own registers. As a general rule, the data will not be transferred outside the territory of the Member States of the European Union or the European Economic Area, unless this is necessary for the purposes of the processing of personal data or for the technical implementation of the processing, in which case the transfer of the data shall comply with the requirements of personal data legislation.

Romu may transfer the data in the register to its own direct marketing registers after the termination of the customer relationship and professional relationship.

8. Protecting the register

The electronically processed data in the register are protected by firewalls, passwords and other technical means generally accepted in the information security industry. Manually stored data is stored in facilities where public access is denied.

Only authorised employees of the controller and of companies acting on behalf of the controller have access to the data in the register, subject to the access rights granted by the controller.

9. Right of inspection, prohibition and correction

The data subject has the right under the Personal Data Act to check what data concerning them has been stored in the register. At the request of the data subject, we will make the necessary corrections and additions to the personal data or delete data that is inaccurate, unnecessary, incomplete or outdated in relation to the purpose of the processing. Data inspections and updates are completed by contacting our customer service. The request must be in writing and signed.

Based on your request, Romu will provide information on the measures taken in response to your request, as a general rule within one month of receiving your request. In addition to the above, you have the right to file a complaint on Romu's personal data processing to a supervising authority. Complaints are made to the Data Protection Ombudsman in accordance with their instructions. The website of the Data Protection Ombudsman is available at www.tietosuoja.fi.

Data subjects have the right to prohibit the processing and disclosure of data concerning them for the purposes of direct advertising, distance selling and other direct marketing, market research and public opinion polls by contacting our customer service.

10. Amendments to the Privacy Statement

Romu is constantly developing its business and, therefore, reserves the right to change this Privacy Statement by announcing such changes in the services. The changes may also be based on changes in legislation. Romu recommends that data subjects regularly review the contents of the Privacy Statement.