

# Privacy Statement of Oy Halton Group Ltd's Customer and Marketing Data Filing System

## 1 General

Oy Halton Group Ltd (later "Company" or "We") is committed to ensure the confidentiality and data protection of personal data at its possession. This privacy statement is applied to personal data that we collect in relation to our customer and marketing data filing system (later "Data Filing System"). The personal data and related processing is described in this privacy statement. Additional information regarding the processing of personal data in the Data Filing System is provided by our contact person Aki Saxén.

We may update this privacy statement from time to time, for example due to changes in applicable legislation. We endeavour to carry out reasonable means to inform you of any possible changes and their effects in due time beforehand. Therefore, we advise you to review this privacy statement always after receiving a notice of changes regarding the privacy statement. The latest version of this privacy statement is available on our website. This privacy statement was last updated on the 09.07.2025

## 2 Data Controller

Name: Oy Halton Group Ltd  
Address: Haltonintie 1-3  
47400 Kausala  
Tel: +358 (0)20 792 200  
Business ID: 3331061-1

## 3 Whose Personal Data Do We Collect?

We process the personal data of the representatives of our customers, potential customers and other partners (later also "You") in the Data Filing System.

## 4 What Categories of Personal Data Do We Process?

We process the following categories of personal data in the Data Filing System:

- your name and location ();
- your contact details: email address and telephone number;
- the company you are representing and your position in the company; and
- your hobbies (only customers)

## 5 Which Sources Do We Use to Collect Personal Data?

We collect personal data primarily from the data subjects themselves (e.g. your contact requests via email, through visits at our webpage, in connection with online and offline campaigns or meetings at exhibitions or fairs, through business cards delivered to us or based on other interaction). In addition, personal data is obtained from other representatives of the company you represent, marketing service providers, third parties and public sources such as the website of the company you represent.

## 6 Basis for, Purposes and Impacts of Processing Your Personal Data

If you are already a representative of our existing customer or partner:

The purpose of the processing of your personal data as a representative of existing customer/partner is in particular the management and maintenance of our customer/partner relationships. In addition, your personal data are processed for the sales and direct marketing of our products and services, provided that the products or services relate to your tasks within the company, and for carrying out our customer research related to product development. By processing your personal data we are able to provide better services for your company and develop our products and services to better fit the needs of our customers. The processing of your personal data will have no other impact on you.

- In case of management and maintenance of customer/partner relationship, the basis for the processing is **our legitimate interest** concerning our relationship.
- In case of direct marketing and customer research, the basis for the processing is **our legitimate interest** concerning our relationship and by being able to offer better services to your company.

If you are our potential customer:

The purpose for which the personal data concerning our potential customers are used is carrying out direct marketing and other sales and marketing measures regarding our services and products, i.e standard marketing procedures such as sending automated or other marketing messages by email or electronically, provided that a prior, appropriate consent has been obtained from you in a form of approval over the website or otherwise [unless the marketing relates products or services relevant to the professional role of you in the potential customer company], or as may be required by law. The processing of the personal data of our potential customers has no other impacts than targeting of marketing messages.

- In such case, the basis for the processing is **our legitimate interest, unless a separate consent is required by law.**

We do not further process your personal data for other purposes than those described in this privacy statement.

## **7 Regular Disclosures and Transfers of Your Personal Data to Third Parties**

We disclose your personal data on a case-by-case basis only to different service providers in relation to our customer events if you are attending to such events. These service providers may include e.g. hotels, travel agencies, restaurants, factories visited and other customer event organisers.

We may transfer your personal data also to our service providers in order to be processed on our behalf. Our current service providers are:

- Halton Group Americas Ltd (Provision of IT services)
- ZEF Oy (Survey platform)
- Salesforce Inc. (Marketing)
- Microsoft (Marketing)
- Advertising agencies (Marketing)
- Printing houses (Marketing)
- Event organisers (Organising events)

Our service providers may process your personal data only for the purposes stated in this privacy statement. We always ensure that our partners do not process the personal data transferred to them for any other purposes.

We may also be required to share your personal data with competent authorities in accordance with legislation concerning the processing of personal data.

## **8 Transfers of Your Personal Data outside the EU or European Economic Area**

In some cases, we transfer your personal data outside the European Union or the European economic area to our following service providers:

- Salesforce Inc. (Location: United States, Grounds for transfer: Trans-Atlantic Data Privacy Framework)

In all situations, we transfer your personal data outside the EU or the European Economic Area only based on the lawful grounds mentioned below:

- the EU Commission has decided that the recipient country in question ensures an adequate level of protection;

- we have established appropriate safeguards for the transfer of personal data such as the standard data protection clauses approved by the Commission. You shall then have the right to obtain a copy of such standard clauses by contacting us in the manner described in the section 'Contacts'; or
- you have given your explicit consent for the transfer of your personal data or another lawful basis for the transfer of your personal data outside the EU or EEA exists.

## **9 Principles for the Retention of Your Personal Data**

We retain your personal data in the Data Filing System in accordance with the following principles:

The personal data of our customers shall be retained for as long as the customer relationship exists. After the termination of the customer relationship your personal data shall be retained for seven years following the termination of the customer relationship.

The personal data of our potential customers shall be retained in the Data Filing System as long as you hold a position to which our marketed product or service is related, provided that you have not prohibited direct marketing or cancelled any given consent. In such case information on the prohibition or cancellation of direct marketing can be retained in the Data Filing System. Your personal data may be retained for longer if applicable legislation or our contractual obligations towards third parties require a longer retention period.

## **10 Rights of a Data Subject in Relation to the Processing of Personal Data**

As a data subject you have the right, at any time, to object to the processing of your personal data for direct marketing purposes. You may give us channel-specific consents and prohibitions concerning direct marketing (e.g. cancelling the given consents, prohibit marketing messages sent by e-mail but allow marketing messages sent by mail).

In addition, you have the right to, according to applicable data protection legislation, at any time:

- be informed about the processing of your personal data;
- obtain access to data relating to you and review your personal data we process;
- require rectification and completion or erasure of inaccurate and incorrect personal data;
- object to the processing of your personal data on grounds relating to your particular situation in so far as the processing of your personal data is based on our legitimate interest;
- receive your personal data in a machine-readable format and transmit those data to another controller (provided that you have delivered us such data yourself, we process such personal data based on an agreement and the processing of personal data is carried out by automated means); and
- obtain a restriction of processing of your personal data.

You should present your request for exercising any of the aforementioned rights in the manner described in the 'Contacts' Section of this privacy statement. We may ask you to specify your request in writing and to verify your identity before processing the request. We may refuse to fulfil your request on grounds set out in applicable data protection legislation.

You also have the right to lodge a complaint with the supervisory authority concerned or with the supervisory authority of the EU member state of your habitual residence or place of work, if you consider that we have not processed your personal data in accordance with applicable data protection legislation.

## **11 Principles of Data Security**

We respect the confidentiality of your personal data. Description of data security measures: E.g. tangible material containing personal data shall be kept under lock and key in a space to which only separately appointed persons have access. Personal data processed digitally are protected and stored in our information system accessible to persons on a need-to-know basis only. Such persons have personal user credentials and passwords. We encrypt Personal data transmitted outside our Company.

## 12 Contacts

All requests concerning the use of the rights mentioned above, questions about this privacy statement and other contacts should be made by e-mail to Aki Saxén to the address [privacy@halton.com](mailto:privacy@halton.com). You may also contact us in person in our offices or in writing:

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Haltonintie 1-3  
47400 Kausala, Finland