

PRIVACY POLICY – NOORMARKKU WORKS

This privacy policy describes how we process the personal data of the visitors of Noormarkku Works and of those who subscribe our newsletter.

1 CONTROLLER

Controller	A. Ahlström Kiinteistöt Oy (hereafter "Ahlström Kiinteistöt" or "we")
Business ID	2566575-4
Address	Laviantie 22, 29600 Noormarkku
Representative	Milla Laurila, +358 50 518 3677

2 LEGAL BASIS AND PURPOSE OF PROCESSING

We process your personal data for the purpose of providing accommodation, meeting and restaurant services. We process your data in these situations to fulfil the contract we have with you as the customer and to fulfil our statutory obligations. We process your personal data for these purposes e.g. in the following situation:

- making reservations;
- communicate to you about your upcoming reservation and informing you about possible changes;
- measures related to invoicing;
- measures related to purchases of our products and services from our web shop; and
- to maintain passenger name records.

We also process your personal data on the basis of our legitimate interest, for example, to improve our services and to market our services. These situations may include us sending you customer surveys or information about our services.

We also process your personal data to send you our newsletter and electronic direct marketing if you have given us your consent to do so.

Your personal data is not being used for automated decision-making that would have legal or similar effects on your rights.

3 PERSONAL DATA COLLECTED

The personal data we process of you may include:

- visitor data for the passenger declaration form such as your name, address, social security number, nationality, date of birth, country of arrival, passport number, date of arrival and date of departure;
- contact details such as e-mail address and telephone number;
- information about subscriptions to our newsletter and consents to electronic direct marketing;
- information about dietary restrictions and allergies;
- invoicing and payment details such as credit card details;
- age range for discount purposes for children and retired persons; and
- camera surveillance information as we have camera surveillance on our general premises for security reasons.

4 RETENTION PERIODS OF PERSONAL DATA

We store your data as long as it is necessary to perform the service you have requested and three (3) years thereafter.

We retain your consent to receive electronic direct marketing and information related to your newsletter subscription until you withdraw your consent or unsubscribe to our newsletter.

Camera surveillance footage is stored for three (3) months.

We may however retain certain personal data longer in situations required by law. Below are examples of such time limits:

- passenger declaration information: one (1) year after the signing of the passenger declaration form (the Act on Accommodation and Food Services Activities); and
- accounting materials: ten (10) or six (6) years from the end of the financial period (the Accounting Act).

5 HOW DATA IS COLLECTED

We obtain your personal data from you when you make a booking for our hotel or restaurant services, make a purchase at web shop, or subscribe to our newsletter. In addition, when a customer attends to a

fair and give permission for marketing, data transfers to us via the event organiser.

6 DISCLOSE OR TRANSFER OF DATA

Processing tasks may be outsourced to external service providers and providers of security services in accordance with and within the limits set by data protection legislation. Main operators to whom processing tasks have been outsourced include providers of payment and marketing services.

We may disclose your personal data to authorities when required to do so by law, such as passenger declaration information to the police authorities when it is necessary for the performance of official duties.

7 TRANSFER OF DATA OUTSIDE THE EU/EEA

The personal data is not transferred outside the European Union or the European Economic Area.

8 SECURITY MEASURES

Personal data is protected appropriately by necessary technical and organizational measures as described below.

The personal data is processed only by those persons who are specifically assigned to perform the tasks that require the processing of your personal data.

Any manual material will be stored in a locked space, accessible only to separately authorised persons. The electronic material is stored in systems which are protected by usernames and passwords and other various technical protections. All persons who process the material are bound by confidentiality obligations.

9 THE PURPOSE OF THE ABOVE ACTIONS IS TO ENSURE THE CONFIDENTIALITY OF PERSONAL DATA, THE AVAILABILITY AND INTEGRITY OF THE DATA, AND THE EXERCISE OF THE RIGHTS OF DATA SUBJECTS. RIGHTS OF THE DATA SUBJECT

As a data subject, you have certain rights under the General Data Protection Regulation 2016/679 (GDPR). Below are short descriptions of these rights. In all matters relating to the processing of personal data and in situations involving the exercise of rights, the data subject should contact the controller's representative.

Right to access: Data subjects have the right to receive confirmation from the controller on whether the controller is processing personal data that concerns them.

Right to rectification: Data subjects have the right to demand the rectification of inaccurate personal data concerning them and to have incomplete personal data completed.

Right to erasure: In certain cases, specified in Article 17 of the GDPR, the data subject has the right to have the controller erase data concerning them.

Right to restriction of processing: In certain cases, specified in Article 18 of the GDPR, the data subject can request the controller to restrict the processing of personal data concerning them.

Right to object: In certain situations, the data subject has the right to object to the processing of their personal data, that is, request the controller not to process it.

Right to data portability: The data subject has the right to receive the personal data that they have provided to a controller in a structured, commonly used, and machine-readable format and, if desired, transmit that data to another controller.

Right to withdraw consent: If personal data is processed based on consent, the data subject has the right to withdraw consent by informing the controller. Withdrawal of consent does not affect the lawfulness of the processing carried out prior to the withdrawal of consent.

Right to lodge a complaint with the supervisory authority: The data subject has the right to lodge a complaint with the competent supervisory authority if the data subject considers that the controller has not complied with the applicable data protection regulation.