

Privacy Statement of Oy Halton Group's Event 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 event 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. This privacy statement was last updated on 23.05.2018.

2 Data Controller

Name: Oy Halton Group
Address: Haltonintie 1-3
47400 Kausala
Tel: +358 (0)20 792 200
Business ID: 0535372-9

3 Whose Personal Data Do We Collect?

We process the personal data of persons who we invite to our events (later also "You") in the Data Filing System.

4 What Categories of Personal Data Do We Process?

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

- your name;
- your contact details: telephone number, email address and work address;
- The name of the organisation you represent and your position in the organisation;
- your assistant's name and contact details
- your avec's name
- other additional information regarding the participation to the event.

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 or through our webpage and business cards delivered to us). In addition, personal data is obtained from other representatives of the company you represent and public sources such as the website of the company you represent.

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

The basis for processing your personal data is ***our legitimate interest***.

The purpose of the processing of personal data is to enable us to invite you to events organised by our Company. The processing of the personal data has no other impacts on you.

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 events. These service providers may include e.g. hotels, travel agencies, restaurants, factories visited and other event organisers.

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: Location: US, Grounds for transfer: EU -US Privacy Shield
- iContact LCC: Location:US, Grounds for transfer: EU -US Privacy Shield

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:

Your personal data shall be retained in the Data Filing System for as long as you hold a position to which our products or services are related. 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

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 of inaccurate and incorrect personal data;
- require erasure of your personal data
- object to the processing of your personal data; 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. 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 the address privacy@halton.com. You may also contact us in person in our offices or in writing:

Oy Halton Group Ltd
Aki Saxén
Haltonintie 1-3
47400 Kausala, Finland