

# Customer Data Privacy Policy

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Updated 25.4.2022.

## DATA PROTECTION

This is a privacy policy that fulfils the obligation to inform registered customers in accordance with Article 13 of General Data Protection Regulation (EU) 2016/679, (GDPR).

## CONTROLLER

Korkia Asset Management Oy (2538288-5)  
(hereinafter referred to as "Korkia")

Address: Kasarmikatu 25 A (2nd floor), 00130 Helsinki

Phone: +358 (0) 10 523 2200

Website: [www.korkia.fi](http://www.korkia.fi)

Contact person: Compliance and legal unit

Email: [legal@korkia.fi](mailto:legal@korkia.fi)

## NAME OF THE REGISTER

Korkia Asset Management Oy's customer data register  
(hereinafter referred to as "the customer data register")

## PURPOSE OF PROCESSING PERSONAL DATA

In the customer data register, Korkia processes the personal data of Korkia's customers and potential customers (hereinafter referred to as "customer") for the purpose of managing the customer relationship, marketing products and services and fulfilling legal obligations.

The processing of personal data is based on Article 6 of the GDPR **(1)** Korkia's legitimate interest in processing the personal data of Korkia's customers, organising customers and marketing, **(2)** the customer's consent or **(3)** compliance with Korkia's legal obligations.

## WHERE IS PERSONAL DATA OBTAINED FROM?

Korkia acquires the personal data of the customer data register primarily from Korkia's customer, the customer's representatives, public registers maintained by the authorities, the credit information register and the customer's bank.

## WHAT IS THE BASIS FOR THE DISCLOSURE OF PERSONAL DATA?

Obtaining personal data is a prerequisite for starting a customer relationship.

## TRANSFER AND DISCLOSURE OF PERSONAL DATA

The data in the customer data register is disclosed to the other companies of the Korkia Group and to the parties responsible for maintaining the customer data register and information systems. These entities are bound by the same obligations of confidentiality, processing of personal data and other obligations as Korkia. In addition,

Korkia discloses information based on the law to various authorities, such as the Financial Supervisory Authority.

## TRANSFER OF PERSONAL DATA OUTSIDE THE EU

Korkia may only transfer personal data outside the European Economic Area **(1)** on the basis of the customer's consent or **(2)** if Korkia has a statutory right or obligation to do so.

## STORAGE OF PERSONAL DATA

Korkia stores customer data in the customer data register in accordance with the Act on Investment Services (Act on Investment Services 747/2012, as amended) during the customer relationship and for five (5) years from the end of the client relationship. Korkia stores customer information in the customer data register in accordance with the Money Laundering Act (Act on Detecting and Preventing Money Laundering and Terrorist Financing 444/2017, as amended) during the customer relationship lasting five (5) years from the end of the customer relationship.

Other information concerning the customer is stored for as long as necessary, taking into account the nature of the information, as a rule during the customer relationship and for five (5) years from the end of the customer relationship.

## CALL RECORDING

All calls to Korkia can be recorded and stored electronically.

## RIGHTS OF THE DATA SUBJECT

The data subject has the right to:

- request access to the personal data of Korkia concerning him or her,
- request rectification, erasure, restriction of processing, object to processing or the right to transfer data from one system to another, and
- withdraw consent to the processing of personal data concerning him or her.

The data subject may send a request related to the exercise of these rights to Korkia in writing or electronically to the address indicated at the beginning of this Privacy Policy.

## COMPLAINT TO THE SUPERVISORY AUTHORITY

The data subject has the right to lodge a complaint with the supervisory authority. The supervisory authority in Finland is the Data Protection Ombudsman.

## Office of the Data Protection Ombudsman

Address: Lintulahdenkuja 4, 00530 Helsinki

Website: [www.tietosuoja.fi](http://www.tietosuoja.fi)

Email: [tietosuoja@om.fi](mailto:tietosuoja@om.fi)