

Peab Data protection description of retail customer register

1 CONTROLLER

The register discussed in this description is maintained by the following independent controllers (hereinafter jointly referred to as “Peab”):

Peab Oy	Peab Infra Oy	Peab Invest Oy
1509374-8	2303725-2	1773022-9
Karvaamokuja 2 A	Karvaamokuja 2 A	Karvaamokuja 2 A
00380 Helsinki	00380 Helsinki	00380 Helsinki
Tel. +358 207 606 200	Tel. +358 207 606 200	Tel. +358 207 606 200

Peab Industri Oy	Lambertsson Oy
1509160-3	0937993-4
Karvaamokuja 2 A	Karvaamokuja 2 A
00380 Helsinki	00380 Helsinki
Tel. +358 207 606 200	Tel. +358 207 606 200

2 CONTACT DETAILS IN REGISTER MATTERS

Peab, data protection officer Tel. +358 207 606 200

tietosuoja@peab.fi

Karvaamokuja 2 A, 00380 Helsinki Finland

3 REGISTER NAME

Retail customer register of Peab

4 BASIS AND PURPOSE OF PROCESSING PERSONAL DATA

The processing of personal data is based on the consent of the data subject, Peab's legitimate interest, statutory obligation, agreement or some other appropriate connection arising from the afore-mentioned bases. The personal data is used for management, administration and development of the relation between Peab and its customers, product and service delivery, analytics and statistics. In addition, the information can be used for direct marketing of Peab and its Group companies and partners (including newsletter orders), marketing campaigns, profiling, online selling, opinion polls and marketing surveys. The information can also be used for planning and development of Peab's business activity and services.

5 REGISTER DATA CONTENTS

The register contains the following personal data on retail customers:

- Basic personal and contact information, such as name, mailing address, e-mail address, telephone number
- Customer history
- Interest and optional profiling data
- Information on use of products and services offered by Peab
- Contacts
- Direct marketing bans
- Other information bearing relevance to the register use

6 REGULAR SOURCES OF INFORMATION

Information for the register is collected from the customer themselves at the making of agreements or other interaction.

Personal information can also be collected and updated within the limits of the applicable legislation from sources in the public domain such as the population data services, the credit registry and other similar public and private registers.

7 REGULAR DATA TRANSFERS

As a rule, Peab does not transfer the registered information to any outside parties. However, information can be occasionally submitted according to the Finnish law to the authorities to fulfil statutory obligations of the controller or according to information requests of the authorities made based on legislation.

8 TRANSFER OF INFORMATION OUTSIDE EU OR EEA

No personal information contained in the register is transferred outside the EU or the EEA.

9 REGISTER PROTECTION PRINCIPLES AND STORAGE PERIOD

Access to the systems containing customer information is allowed only for employees who have the right to process customer information based on their work duties. Each processor has a personal username and password to the system. The information is collected in databases protected by firewalls, passwords and

other technical means. The databases and their backup copies are located in locked premises, and access to the data is only allowed for persons nominated in advance.

The registered information is saved only for as long as the use of the personal information so requires considering the storage periods arising from legislation such as the Housing Transactions Act, the Consumer Protection Act, the Accounting Act, and the Tax Prepayment Act. The maximum storage periods also depend on the 10 years' guarantee period applicable to builders and on the length of defects liability during and after the guarantee period as per the General Conditions for Building Contracts YSE 1998.

The controller takes all reasonable measures to ensure that any inaccurate, incorrect or invalid personal information in view of the purposes of its processing is removed or corrected without delay.

10 DATA PROTECTION AT PEAB

Peab ensures the protection of customer information.

- The connections we use are protected by a reliable firewall solution, and all data communications are encrypted by the SSL technology.
- Regular data protection audits and vulnerability control
- Virus and malware prevention
- Safe updating and software development practices
- Regular data security training to administration personnel

11 RIGHTS OF DATA SUBJECTS

A data subject has the following rights under the General Data Protection Regulation of the EU:

- (a) a right to receive the controller's notification if the personal information of the data subject is processed or if it is not processed; if such personal information is processed, a right of access to the personal information; a right to receive information on the following matters: (i) purposes of processing; (ii) categories of personal information in question; (iii) recipients or recipient groups to whom the personal information is or will be transferred; (iv) planned storage period of the personal information, or if such period cannot be confirmed, the criteria by which it is determined; (v) a right of data subject to ask the controller for rectification or removal of the personal data concerning themselves, or for restricted processing of their information, or to object to such processing; (vi) a right to file a complaint to the supervisory authority; (vii) if personal information is not collected from the data subject, (the data subject has) a right to receive all information available on the origin of the information;
- (b) a right to revoke their consent at any time without prejudice to the lawfulness of the processing carried out based on the consent before its revocation;
- (c) a right to require that the controller rectify any inaccurate or incorrect personal information concerning the data subject without unnecessary delay and a right to have any missing personal information added by submitting an additional clarification considering the purposes for which the information was processed;

- (d) a right to have the controller remove the personal information concerning the data subject without unnecessary delay, provided that (i) the personal information is no longer needed for the purposes for which it was obtained or for which it was otherwise processed; (ii) the data subject revokes their consent which was the basis for its processing while there is no other legitimate basis for processing it; (iii) the data subject objects to the processing of their personal information depending on their individual circumstances in the absence of a justified reason for processing it; (iv) the personal information was processed against the law; or (v) the personal information must be removed to comply with a statutory obligation applicable to the controller under the Union law or national legislation;
- (e) a right to have the controller restrict the processing, if (i) the data subject denies the correctness of their personal information, whereby the processing is restricted for a period of time in which the controller can ascertain its correctness; (ii) the processing goes against the law and the data subject objects to the removal of their personal information and, instead, requires restricting its use; (iii) the personal information in question is no longer needed by the controller, but the data subject needs it to prepare, present or defend a claim; or (iv) the data subject has objected to the processing of their personal information depending on their individual circumstances while waiting for proof on whether or not the legitimate bases of the controller supersede over the justification of the data subject;
- (f) a right to receive the personal information submitted to the controller by the data subject themselves, presented in a systematised, generally applied and machine-readable form, and a right to transfer such information to another controller without prejudice to which controller the personal information was submitted, provided that its processing is based on consent as referred to in the decree and that the information is processed automatically;
- (g) a right to file a complaint to the supervisory authority, should the data subject deem that the processing of their personal information violates against the General Data Protection Regulations of the EU.

The requests concerning the exercise of the rights of the data subject are addressed to the controller's contact person mentioned in Section 2.