



General Data Protection Regulation (GDPR) Privacy Notice

Responsible Function:

Legal

Approved by:

President & CEO

Revision	Revision	Author	Approved by	Approved date
1	August 2018	Jyrki Siltala	Jussi Helavita	14 Aug 2018
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LUVATA

General Data Protection Regulation (GDPR) Privacy Notice

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PRIVACY NOTICE

Luvata (later referred to as “Luvata” or “we”) places the highest priority on protecting the integrity of your personal data and other confidential information collected from you, whether about you, your company, your transactions, your products or your service.

This Privacy Notice explains the commitment of Luvata to keeping personal data and other confidential information concerning our customers, our stakeholders and the users of our web services confidential and secure at all times. This Privacy Notice also explains how and for which purposes personal data is processed by Luvata. Luvata collects and processes personal data in accordance with applicable laws and this Notice.

1. For what purposes do we process your personal data?

As a part of its operations, Luvata processes personal data for a variety of purposes. Depending on each purpose, the processing is either based on your consent, the fulfilment of a contract between Luvata and you, our legal obligations, or our legitimate interests arising from the relationship we have with you. We may also process personal data on the basis of our legitimate interest to develop and market our business and to safeguard our legal rights. The purposes for which personal data is processed by Luvata include the following:

- We process the personal data in our customer register to manage and develop customer relationships, to provide and deliver products, to manage payments and debt collection, to process possible reclamations and to defend against possible claims, as well as to fulfil our legal obligations relating to e.g. accounting and tax legislation.
- We process the personal data in our supplier and stakeholder register to fulfil contracts, to manage and develop co-operation and business relationships, to send marketing communications and event invitations, to manage deliveries and payments, to defend against possible claims, as well as to fulfil our legal obligations relating to e.g. accounting and tax legislation.
- We process data on website visitors to develop our website and to improve its safety and functionality, and to track use of our website.
- We process data in our job applicant register to make recruiting decisions.
- We process data in our employee register to manage employment relationships and to fulfil our duties as an employer.
- We secure our premises using various systems, such as security cameras and access control

The personal data we collect and process depends on the purpose for which the data is processed. Our registers include names and contact information of our customers, suppliers and stakeholders or their representatives, as well as our employees and job applicants. Our registers also include information relating to the customer, co-operation or employment relationship, as well as other type of information you provide to us from time to time. In the course of your use of our website, we also collect certain information about you, such as your IP address and cookie data.

Luvata collects personal data directly from you. In certain cases, we may also collect data relating to you from your employer, from public authorities, from public registers or from other external sources. If you do not provide your personal data to us, we may not be able to serve you or the company you represent, to offer you certain functions of our website or to include you in our recruitment processes.

2. How long do we keep your personal data?

Luvata retains your personal data as long as it is necessary for our operations or for complying with our legal obligations. This means that we usually keep your personal data for some time after you no longer have a relationship with us. The retention periods vary greatly depending on the type of data and the purpose of the processing.

3. Whom do we disclose or transfer your data to?

As a rule, we do not disclose your personal data to any third parties, except for Luvata group companies. However, where we have a legal obligation to do so, we may disclose your personal data to authorities. We may also disclose your personal data to our auditors and insurance companies.

We have also entered into agreements with certain service providers who may process your personal data on our behalf as a part of the service they provide to Luvata. In such cases we have entered into appropriate agreements with the service providers to ensure that your data is processed in accordance with applicable law and our instructions.

Luvata does not resell any collected information to other companies, and we do not provide collected information directly to advertisers. We may, however, transfer collected information to a third party purchasing all or substantially all of our assets.

4. Is your data processed outside the EU or the European Economic Area?

Luvata may transfer your personal data outside the EU or the European Economic Area in accordance with applicable data protection legislation. Data may be transferred to e.g. our service providers or Luvata group companies located in various locations, including the United States. When your personal data is transferred outside the EU or the European Economic Area to a country which does not guarantee adequate level of data protection, Luvata will use appropriate safeguards to ensure a sufficient level of protection. In accordance with the applicable data protection legislation, the safeguards include e.g. the European Commission's model contractual clauses or certification under the EU-US Safe Harbor.

5. How do we protect your information?

We use industry-standard efforts to safeguard the confidentiality of your personal information such as firewalls and authentication protection. In addition to technical measures, we also safeguard your personal data with various organisational measures, such as role-based access rights.

6. What rights do you have?

Your rights relating to the processing of your personal data depend on the applicable legislation. Below is a list of the rights you have, to the extent EU regulations apply to the processing of your personal data.

Right to object	<p>Based on your particular situation, you have the right to object to profiling and other processing in situations where Luvata processes your personal data based on our legitimate interests on the grounds provided by law.</p> <p>You may exercise your right to object by contacting Luvata at mail@luvata.com. You must specify the particular situation based on which you are objecting to the processing of your personal data.</p>
Direct marketing	You can consent to or prohibit direct marketing from us on a channel-by-channel basis.
Right of access	You have the right to review what data we have collected on you and to receive a copy of such data. We can deny such a request on the grounds provided by law. Exercising this right is generally free of charge.
Right to request rectification, erasure or restriction of processing	You have the right to request that we rectify inaccuracies related to your personal data on the grounds provided by law. You can also request that we erase certain personal data on you or that we restrict the processing of your personal data on the grounds provided by law.
Right to data portability	To the extent we process personal data based on your consent or in order to fulfil a contract between Luvata and you, you may request us to port your personal data to you or to another data controller in a commonly used machine-readable format on the grounds provided by law.
Right to withdraw consent	Where you have given your consent to the processing of your personal data, you have the right to withdraw such consent at any time, free of charge, unless there is another legal basis upon which we can continue to process your personal data.
Right to lodge a complaint with a supervisory authority	You are entitled to lodge a complaint with the competent supervisory authority if you consider that Luvata has not complied with the applicable data protection regulations.
Right to be informed	You are entitled to be provided with certain information when your personal data is obtained by Luvata.

7. Modifications

Luvata may, in its discretion, at any time modify this Privacy Notice. Upon modification of this Privacy Notice, Luvata will post a revised Privacy Notice on its website and such modifications shall apply to all of your personal data collected by us after the posting of the revised Privacy Notice.

8. Electronic Communications

You consent to Luvata sending you e-mail messages and other electronic communications (a) in connection with your use of our website, (b) in the ordinary course of our business, or (c) for any other legitimate business purpose (including, but not limited to, marketing). Since we endeavor to send e-mail messages and other electronic communications only to individuals desiring to receive them, you can unsubscribe to such e-mail messages or other electronic communications at any time by contacting us as set forth in Section 9 or by following the directions contained in such e-mail messages or other electronic communications.

9. More information

If you have questions relating to this Privacy Notice or our data protection policies, or if you wish to exercise your rights, please contact us at mail@luvata.com.

Data controller:

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