

PRIVACY STATEMENT

1 General information

This privacy statement describes how Versowood Group Oy (Business ID: 0789823-9) ("**Versowood**" or the "**company**") processes personal data; what kinds of personal data the company collects, for which purposes the data is used and to which parties the data can be disclosed. The privacy statement also provides information on the obligations to be met by Versowood regarding the processing of personal data.

Personal data refers to any information relating to a natural person (**data subject**) that can identify him or her, directly or indirectly. Personal data, data subject, controller, processor and other key terms are defined in the European Union General Data Protection Regulation (2016/679) ("**GDPR**"). The company complies with the GDPR in all processing of personal data in conjunction with other applicable data protection legislation (collectively "**data protection legislation**"). Ensuring data protection is an integral part of all Versowood business operations.

The business operations of Versowood are focused on timber trade, lumber production and further processing of wood. This privacy statement applies to all products and services offered by the company as well as ancillary functions, such as the website and webstore, marketing activities, social media and visits. It covers the processing of the personal data of the company's suppliers, customers and potential customers (both consumers and businesses), timber vendors and other partners, service providers, subcontractors and visitors. This privacy statement also covers recruitment, i.e. the processing of the personal data of job applicants.

There is a separate privacy statement for the processing of the personal data of company staff.

2 Controller

Controller: Versowood Group Oy (Business ID 0789823-9)
Address: Sahatie 1, 19110 Vierumäki, Finland
Telephone: +358 10 8425 100
Email: privacy@versowood.fi
tietosuoja@versowood.fi

3 Purposes and legal basis for processing personal data

Personal data will be processed for the following purposes among other things:

Purpose of the processing	Legal basis
- invitations for tenders of the company and products and services the company has acquired and implementation of contracts (such as management of products and services, invoicing, payments, notifications, feedback, contacts, appointments and customer service)	Contract or its preparation
- fulfilment of statutory obligations, such as obligations under tax and accounting legislation	Statutory obligation

- implementation of the company projects and fulfilment of related obligations and responsibilities	Contract, statutory obligation and legitimate interest of the company in carrying out business to satisfy the needs of current and future customers
- risk management, ensuring security and prevention of misconduct - ensuring the safety of persons, property, premises, production facilities and other facilities	Statutory obligation to ensure the security of data and persons among other things and to prevent misconduct, and legitimate interest to protect property
- maintenance, development, quality assurance and communication of products and services - business planning and development - personalised customer service regarding services, customer communications, customer surveys and monitoring the use of services - marketing and targeting marketing to customers and potential customers, as well as organising and managing contests, draws and campaigns	Legitimate interest of the company in providing information about products and services to existing and prospective customers, as well as developing and marketing products and services.
- management of voluntary events and services - electronic, personal direct marketing	Consent to participate in a particular event or in a specific type of marketing (e.g. electronic direct marketing) The data subject has the right to revoke his or hers consent (see the rights of the data subjects below).
- recruitment	Legitimate interest of the company in recruiting employees and offering employment to the data subject

4 Categories of personal data to be processed, information content and sources of personal data

The company collects only such personal data from the data subjects that are relevant and necessary for the purposes described in this privacy statement.

The following personal data from the data subjects will be processed:

Category of personal data	Examples of information content
4.1 Contact information	Name, address, phone number, email address.
4.2 Identification information	Social security number, other corresponding national identity number and date of birth.
4.3. Information related to the customer relationship	Account number, invoicing and payment information, and other information identifying the customer relationship, such as customer number.
4.4 Customer transaction details and contract details	Personal data contained in the contract and other documentation between the company and the data subject or the company and the community representing the data subject, customer feedback, complaints and any other communications between the data subject and the company in addition to other transaction information.
4.5. Information collected on the basis of the contractor's obligations	Information collected on the basis of the Finnish Act on the Contractor's Obligations and Liability when Work is Contracted Out (1233/2006), particularly in regards to contract facilities and installation and subcontracting.
4.6 Camera surveillance	Recordings of camera surveillance that may identify the data subject in the premises of the company and other facilities.
4.7 Technical behavioural data and identification data	Monitoring the data subject's web behaviour and use of company services, for example by means of cookies or similar technical identification data. Examples of data that can be collected include the user's IP address, visited pages, browser type, web address, session time and duration. For more information about the use of cookies and other technical means of tracking and retention periods, please check to the cookie policy of the company.
4.8. Rights management of the data subject, such as consents and prohibitions	Marketing prohibitions and consents. Communication and measures relating to the rights of the data subject (see the rights of the data subject below).
4.9. Information related to recruitment	Résumé and job application as well as other information related to education, skills and employment history.

	Results of any aptitude tests, credit information checks and security checks.
	Information of referees and other persons involved in the recruitment.
4.10 Other voluntarily supplied (additional) information	Wishes and preferences regarding the contract or marketing / marketing events.
	Any other information provided during contact, contests, draws or meetings.

The provision of the information mentioned under sections 4.1 to 4.6 is necessary for the performance of the contractual and legal obligations between the company and the data subject and for the provision of the services of the company. If the data subject does not provide the necessary personal data, the execution or the implementation of the contract or the performance of statutory obligations may be prevented.

For more information on the data mentioned in section 4.7, please check the cookie policy. The provision of the information specified in sections 4.8 to 4.10 is optional, but necessary if the data subject wishes to exercise his or her rights or to obtain service that complies with his or her wishes or preferences. Failure to provide information connected to recruitment hinders the job applicant's assessment and may lead to the termination of the recruitment process.

4.1 Data sources

Personal data is mainly collected from the data subjects themselves, for example when contacting the company, at the time of providing a tender, in connection with the signing of a contract or during a customer relationship. The data subject may have provided the company with data when visiting the company, its website, webstore or social media, or when participating in contests and draws. In addition and with the permission of the data subject, data may be collected in other ways in a marketing context.

4.1.1 Data collected from other sources

Regarding marketing operations, the company may use third party service providers who process data subject contact information for marketing purposes.

Personal data may also be collected from the community on behalf of which the data subject is acting. Furthermore and to the extent permitted by law, data may also be collected and updated from third party registers, such as the Finnish Forest Centre information service (Metsäkeskuksen tietopalvelu).

Suppliers, subcontractors, partners and other stakeholders provide the personal data of data subjects in situations required by law and contractual obligations.

The company may collect recruitment related personal data from recruitment service providers and from possible background checks, such as during credit information checks and by contacting the referees. However, during recruitment, data is not collected directly from third parties without the data subject being aware of the collection. In addition, credit information checks shall comply with the requirements laid down in legislation.

5 Retention of personal data

The company retains personal data for as long as necessary to fulfil the purposes defined in the privacy statement, unless longer retention is required by legislation (for instance, due to responsibilities and obligations concerning specific legislation, accounting obligations or reporting obligations). Personal data may be retained for longer if they are necessary for the exercise of a legal claim or for defending against a legal claim or for resolving a corresponding disagreement.

The retention period and retention criteria of personal data vary depending on the categories of personal data and on the purpose of each particular category of personal data.

Personal data will be processed for the duration of the customer and contractual relationship and for a necessary period of time after the customer and contractual relationship has ended.

With regard to a representative of our business partners, the retention of his or her personal data is linked to the amount of time that the data subject is acting as a representative of the company's stakeholder community.

Personal data necessary for marketing purposes shall be retained for as long as the data subject is the target of a particular marketing activity, e.g. is involved in an event or the company is in contact with the data subject regarding certain services or products, and the data subject has not objected to the use of his or her personal data for direct marketing, or when marketing is based on consent, has not withdrawn his or her consent.

Consents, prohibitions and restrictions on the processing of personal data shall also be retained for as long as they are in force.

Personal data relating to recruitment shall be kept for the duration of the recruitment process and for up to 6 months after the new employee has started (statutory maximum time for probationary periods). Open applications shall be kept for a maximum period of 6 months from receipt, unless the data subject joins the recruitment process of a vacancy during this time. Targeted applications shall be kept for a maximum period of 12 months from receipt. The company may request permission from the data subject to retain recruitment information for longer for future vacancies. If the data subject is employed by the company, the processing of personal data may be continued on the basis of employment. This processing is described in the separate privacy statement for the company staff.

When personal data is no longer needed for the purposes specified above, the data will be erased within a reasonable period of time.

For more detailed information on the personal data retention periods or the criteria regarding retention periods, please contact the company.

6 Transfers and recipients of personal data

Companies belonging to the same group as Versowood Group Oy may process personal data in accordance with data protection legislation.

The company may disclose personal data to third parties and use third party processors, such as service providers, for processing personal data. For example, service providers and subcontractors providing IT systems, financial management services, legal services, goods transports and other services may take part in the processing of personal data. The company provides adequate contractual obligations to ensure that processors process the personal data in a proper and lawful manner.

In addition, the company may have to disclose personal data to contractual partners of the company and other third parties because of the company's contractual obligations and statutory reporting and notification obligations.

- For more information about processors and other recipients, please contact the company.

In addition, in emergency situations or other unforeseen circumstances, the company may be required to disclose personal data in order to protect the lives and health of persons as well as property. Furthermore, in case the company is involved in legal proceedings or other dispute resolution procedures, it may have to disclose personal data. In case of a merger, acquisition or other business arrangement in which the company is involved, it may have to disclose personal data to third parties.

7 Transfer of personal data outside the European Union or the European Economic Area

The company does not, as a rule, transfer personal data outside the European Union (EU) or the European Economic Area (EEA). If the company transfers personal data outside the EU/EEA area, the company will ensure adequate level of protection and protection measures for personal data, for instance, by agreeing on matters related to the transfer of personal data required by data protection legislation, for example, by using the standard contractual clauses approved by the European Commission.

The following recipients may transfer personal data outside the EU/EEA area:

- Subcontractors for the telecommunications operator DNA (additional information on request).

8 Data protection principles and security of processing

The company processes personal data in a manner that aims to ensure the appropriate security and data protection of the personal data in all situations, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

The company uses appropriate technical and organisational measures in order to keep the data secured, including the use of firewalls, encryption techniques, secure IT equipment facilities and appropriate management of access control, guidance for the personnel participating in the processing of personal data and guidance for subcontractors.

Paper documents are kept in a locked space with access granted only to those parties which are entitled to access the data. Information is printed only when needed, and paper printouts are destroyed in a secure manner.

Access rights are limited according to job tasks. All parties processing personal data are bound by an obligation of professional secrecy regarding personal data processing matters.

The company may outsource the processing of personal data to service providers, in which case the company will ensure, with adequate contractual obligations, that personal data is processed properly and lawfully.

9 Rights of data subjects

The data subject has rights under data protection legislation.

9.1 Right of access and right of inspection

The data subject shall have the right to obtain confirmation as to whether or not personal data concerning him or her is being processed.

The data subject shall have the right to inspect and view data concerning him or her and, upon request, the right to obtain the data in a written or electric form.

9.2 Right to rectification and right to erasure

The data subject shall have the right to request the rectification of incorrect or inaccurate data concerning him or her. In addition, the data subject has the right to request the erasure of his or her data under current data protection legislation.

Moreover, the company shall on its own initiative delete, correct and complement any personal data which is discovered to be incorrect, unnecessary, incomplete or outdated for the intended processing purposes.

9.3 Right to data portability, right to restriction of processing and right to object to processing

Under the conditions set out in the current data protection legislation, the data subject has the right to request the transfer of his or her data to another controller.

In addition, the data subject shall have the right, under conditions defined by data protection legislation, to request the restriction of processing of his or her personal data. Moreover, in situations where personal data suspected to be incorrect cannot be corrected or removed, or if the removal request is unclear, the company will limit the access to such data.

The data subject shall have the right to object to the use of his or her data for a certain type of processing, such as direct marketing, and to prohibit such use.

9.4 Right to withdraw consent

Where personal data processing is based on consent given by the data subject, the data subject shall have the right to withdraw his or her consent. In addition, the data subject shall have the right to withdraw his or her consent to electronic direct marketing. The withdrawal of consent shall not affect the processing performed before the withdrawal of consent.

9.5 Exercising rights

Requests regarding the rights of data subjects shall be made in connection with a personal visit or in written or electronic form, and they shall be addressed to the controller mentioned on this privacy statement.

- Contact details are in section 2 of this privacy statement.

Identity will be checked before the information is given out, which is why we may have to ask for additional details. The request will be responded to within a reasonable time and, where possible, within one month of the request and the verification of identity.

If the data subject's request cannot be met, the refusal shall be communicated to the data subject in writing. The company may refuse a request (regarding erasure of data, for example) due to a statutory obligation or a statutory right of the company, such as an obligation or a claim relating to our services.

9.6 Right to lodge a complaint with a supervisory authority

The data subject shall have the right to lodge a complaint with a competent data protection authority if the data subject considers that the processing of personal data relating to him or her infringes current legislation. However, we request that the matter be dealt with the company in the first instance.

Contact details of the Finnish data protection authority can be found [here](#).

10 Changes to the privacy statement

We are constantly developing our services and, due to this, we may be required to modify and update this privacy statement. Changes may also be carried out due to changes in legislation. We encourage you to review the content of this privacy statement regularly. Changes will be announced on the company website, and material changes will be communicated to the data subjects where necessary.

The privacy statement has been updated on the 30th of November 2018.

10.1 Revision history

Version	Date	Revision
1.0	25th of May 2018	Statement document created
1.1	30th of November 2018	Statement document updated