

## CINIA'S PRIVACY POLICY

Cinia respects everyone's right to privacy and processes all personal data confidentially and in compliance with laws and regulations on data protection. Data protection is a part of Cinia's overall compliance activities, risk management and responsible operating principles. Cinia's privacy policy defines how the lawful processing of personal data and a high level of data protection are ensured in Cinia's functions. This privacy policy defines the principles, procedures and responsibilities that apply to the implementation and development of data protection at Cinia.

**This privacy policy applies to Cinia Ltd and its group companies ("Cinia"). All Cinia employees and any leased employees are obligated to read this document and comply with it when working at Cinia and outside the workplace.**

### Goal of the privacy policy

The correct processing of personal data has a significant influence on Cinia's competitiveness, impact and reputation, as well as the minimisation of risks. The trust shown by Cinia's employees, job applicants, customers and other stakeholders towards the company's practices in ensuring information security and data protection is a significant factor that supports Cinia's activities. The goal of this privacy policy is to protect the privacy of individuals, the confidentiality of personal data and other rights of data subjects when processing personal data.

This privacy policy is an integral part of Cinia's security policy. Furthermore, the security policy also applies to the processing of personal data.

### Privacy policy and risk management

Cinia always operates in compliance with the legislation, any guidelines issued by the company's Board of Directors, the risk management policy and responsible operating principles. Risk management applies to data protection in accordance with Cinia's security policy. According to Cinia's security policy, risk management is based on an annual calendar tied to the company's operations and guidelines on risk management issued by Cinia's executive team for each operating year. A more detailed annual calendar is defined in Cinia's security policy.

### Personal data and its processing

Personal data includes all data and entries that represent a natural person, their qualities or living conditions and that can be identified to concern the person or their family or other individuals living in the same household. The processing of personal data covers functions that are carried out with personal data or data groups containing personal data by means of automated or manual data processing, such as collecting, saving, arranging, organising, retaining, editing or modifying data, searching for data, requesting data, disclosing data by means of transfers, spreading data or otherwise making it available, combining or merging data, or restricting, erasing or destroying data.

#### **The following requirements apply to the processing of personal data:**

- a) Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject (lawfulness, fairness and transparency).
- b) Personal data must be collected for a specific, explicit and legitimate purpose, and it cannot later be processed for purposes other than these (purpose limitation).

- c) Personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (data minimisation).
- d) Personal data must be accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (accuracy).
- e) Personal data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed (storage limitation).
- f) Personal data must be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (integrity and confidentiality).

As the data controller, Cinia is responsible for, and have to be able to demonstrate compliance with these requirements (accountability).

**The processing of personal data is only lawful if at least one of the following requirements is fulfilled:**

- a) The data subject has given consent to the processing of their personal data for one or more specific purposes.
- b) Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- c) Processing is necessary for compliance with a legal obligation to which the controller is subject.
- d) Processing is necessary in order to protect the vital interests of the data subject or another natural person.
- e) Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
- f) Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party.

At Cinia, the processing of personal data is based, as defined above, on consent given by data subjects or other legal grounds. Personal data is only processed on the basis of a lawful purpose of use, and only to the extent and only as long as is necessary considering the purpose of use.

## Providing data subjects with information

As the data controller, Cinia prepares a description of each of its personal data registers as required in the legislation. These descriptions (privacy notice) are available to data subject's on Cinia's internal websites, external websites and, if necessary, by other means, such as from the reception desks of Cinia's offices. These descriptions define, for example, the personal data being processed, the purpose of processing, the storage period of data and the rights of data subjects in more detail.

## Roles and responsibilities

Every Cinia employee must be familiar with and competent in data protection regulations and guidelines and any risks associated with data protection regarding their area of responsibility. Furthermore, every Cinia employee undertakes to comply with the data protection guidelines, take part in data protection training and report any information security breaches.

Cinia's legal affairs unit leads and develops the fulfilment of data protection at Cinia and assists Cinia's business functions and support services in matters related to data protection. Members of the executive team are responsible for the fulfilment of data protection regarding their business units and areas of responsibility. Cinia's business units and

support services are also responsible for data protection if the processing of personal data is outsourced. If the processing of personal data is outsourced, an agreement on the processing of personal data maintained by Cinia's legal affairs unit must be signed in accordance with the legislation.

## Personal data breaches

Any personal data breaches must be reported without undue delay to the supervisory authority (Data Protection Ombudsman). If possible, this report must be sent within 72 hours after discovering the breach. If Cinia is the processor of personal data on behalf of its customers (e.g. in the role of a system administrator), Cinia must report any information security breaches to the customer without undue delay after discovering the breach.

Cinia maintains detailed guidelines on reporting and investigating any personal data breaches.

## Confirming the privacy policy

Members of the executive team of Cinia Ltd confirmed this policy on 14 May 2018.