

Register and privacy statement Ethica Ltd

This is the register and privacy statement of Ethica Oy in accordance with the EU's General Data Protection Regulation (GDPR). Updated on 4.5.2023.

1. Register holder

Ethica Ltd
Mikonkatu 13 F
00100 Helsinki
Y-tunnus: 2558313-4

2. Contact person responsible for the register

Paula Fontell, +358 40 768 0160, paula.fontell@ethica.fi

3. Legal basis and purpose of processing personal data

The purpose of processing personal data is to communicate with customers and stakeholders, marketing, and various analysis projects.

The legal basis for processing personal data in accordance with the EU's General Data Protection Regulation includes:

- Consent of the data subject
- Contract where the data subject is a party
- Legitimate interests of the data controller (such as pre-contractual customer relationship, marketing)

4. Contents of the register

The information to be stored in the register includes:

- Name of the person
- Position
- Company/organization
- Contact information (phone number, email address, address)
- Web page addresses
- Internet Protocol (IP) address of the user's device
- Usernames/profiles on social media services
- Information on ordered services and their modifications
- Billing information and other information related to the customer relationship and ordered services

IP addresses of website visitors and cookies that are necessary for the functioning of the service are processed based on legitimate interest, among other things, for

ensuring data security and collecting statistical information on website visitors when they can be considered as personal data.

5. Regular sources of information

The information to be stored in the register is primarily obtained from the data subject:

- Messages sent through web forms
- Email
- Telephone
- Social media services
- Contracts
- Customer meetings and other situations where the customer provides their information

Contact information of companies and other organizations may also be collected from public sources such as websites, directories, and other companies.

6. Regular disclosures of information and transfer of data outside the EU or EEA

Personal data is not regularly disclosed to other parties. An exception is consortium projects, where personal data is transferred to consortium partners providing services or financiers, if it is necessary (such as organizing events or interviews).

Personal data may also be transferred by the data controller to parties outside the EU or EEA (such as virtual workshop environments) if it is necessary. These parties have committed to complying with the requirements of the General Data Protection Regulation in ways that ensure adequate data protection for the processing of personal data.

7. The principles of data protection

Data processed through information systems is appropriately protected. When registry information is stored on internet servers, the physical and digital security of the hardware is taken care of properly.

8. Right of inspection and the right to demand correction of information

Every individual registered in the registry has the right to check the information stored about them and demand correction of any inaccurate information or supplementation of incomplete information. If an individual wishes to check their stored information or demand correction, the request must be sent in writing to the contact person. The data controller may request the requester to prove their identity if

necessary. The data controller will respond to the customer within the time limit set in the EU General Data Protection Regulation (usually within one month).

9. Other rights related to the processing of personal data

An individual registered in the registry has the right to request the removal of their personal data from the registry ("right to be forgotten"). Similarly, data subjects have other rights under the EU General Data Protection Regulation, such as the right to restrict the processing of their personal data in certain situations. Requests must be sent in writing to the data controller. The data controller may request the requester to prove their identity if necessary. The data controller will respond to the customer within the time limit set in the EU General Data Protection Regulation (usually within one month).