

## Privacy statement for marketing register

Updated 31 December 2025

### Joint controllers:

Luotea plc and all group companies belonging to the same group in Finland (hereinafter "Luotea").

Companies belonging to Luotea group:

Luotea plc (1680140-0)

Luotea Siivous Oy (3155982-7)

Luotea Kiinteistöhuolto Oy (3155934-1)

Luotea Kiinteistötekniikka Oy (3155933-3)

Each Luotea group company is responsible for the processing of personal data in its own business for purposes and on the legal grounds in accordance with this privacy statement and may use the necessary personal data collected by other group companies for the same purposes, e.g. in marketing.

### Contact details in matters concerning the register:

Name: Luotea plc

Business ID: 1680140-0

Postal and street address: Kutomotie 2, FI-00380 Helsinki, Finland

Telephone: +358 (0)10 590 2000

Email: [tietosuoja@luotea.com](mailto:tietosuoja@luotea.com)

### Name of the register:

Luotea group marketing register

### Legal basis for the processing of personal data:

The legal basis for the processing of personal data is the legitimate interest of Luotea (for example, direct marketing) and the consent (electronic direct marketing).

### Purpose of the processing of personal data:

Personal data in the register shall be processed for the following purposes:

- direct marketing of Luotea
- conducting opinion and marketing surveys
- arranging sales and marketing events
- arranging marketing competitions and prize draws
- the planning and development of Luotea's business operations and services
- Targeting and profiling online advertising

### Data subject categories:

Potential private customers and former private customers whose customer relationship has expired.

### Data content of the register:

The register contains the following personal data:

- name
- title or profession
- contact details (postal address, email address and telephone number)
- age or year of birth, sex and communication language

- a maximum of one additional identifying detail concerning the data subject
- consent and prohibitions concerning direct marketing
- data related to marketing and sales promotions (for example, marketing efforts targeted to the data subject)
- possible additional information collected with the data subject's consent, e.g. photos

**Regular sources of data:**

The data is primarily collected directly from the data subject by telephone, online, in meetings or other similar manners.

Personal data may be updated and retrieved via publicly available data sources such as public and private registers.

**Regular disclosure and transfer of data:**

The personal data is not regularly disclosed to third parties outside Luotea group companies.

Luotea uses external service providers to process personal data for the following services:

- Systems maintenance, development (incl. testing) and troubleshooting; and
- implementation of direct marketing, advertising and communication.

Each service provider processes personal data in accordance with the data processing agreement only to the extent necessary to provide the service.

**Transfer of data outside the EU or EEA:**

Luotea and its subcontractors may process personal data outside the EU or the EEA. If the European Commission has not issued a decision on the adequacy of data protection, an agreement on the transfer of personal data in accordance with the standard clauses approved by the European Commission is generally drawn up with the service provider. As an alternative to the use of standard clauses, Luotea also has the right to transfer personal data using other means of transfer permitted by legislation.

**Principles of register protection:**

The data in the register is stored in information systems that use both technological and programmatic measures to ensure the sufficient level of data security. Each person using the register has a personal username and password to the system. Only determined people shall have access to the data in the register to the extent required by their tasks.

**Data retention period:**

The personal data is stored permanently in the register to the extent allowed by law. Luotea shall regularly evaluate the necessity of retaining the data. In addition, Luotea shall take care of such reasonable measures that ensure that no personal data related to the data subjects that are obsolete, inaccurate or incompatible with the purpose of the processing of the personal data are stored in the register.

**Rights of the data subject:**

*Right of inspection and right to request rectification or erasure of personal data*

Data subjects have the right to inspect their personal data entered into the register. In addition, data subjects have the right to request the rectification of

inaccurate data and erasure of data. Inspection, rectification and/or erasure requests must be submitted in writing by using the above contact details.

*Other rights*

The data subject shall have the right to prohibit the use of personal data concerning the data subject for the purposes of direct marketing, marketing or opinion surveying. Such a prohibition can be set at any time by sending an e- mail to [tietosuoj@luotea.com](mailto:tietosuoj@luotea.com) or, for example, by unsubscribing from the newsletter according to the instructions set out in the newsletter.

According to the General Data Protection Regulation data subjects have the right to object to or to request a restriction and transfer on the processing of their personal data, to withdraw their consent and to lodge a complaint regarding the processing of their personal data to the data protection authority. Withdrawal of consent shall not affect the lawfulness of the processing prior to the withdrawal.