

Privacy statement for business customer and business partner 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 the 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, sales and the implementation of agreements and customer relations between the group company and its customers.

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

Name of the register:

Luotea Group business customer and business partner register

Legal basis for and the purpose of the processing of personal data:

The legal bases for the processing of personal data are the legitimate interest of Luotea's group companies and a contract between Luotea's group companies and the business customer or business partner.

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

- the management, maintenance, development, analysis of the contractual relationship between Luotea (or one of its group companies) and the business customer or business partner and creating statistics related to this relationship
- customer communications
- direct marketing of Luotea and its group companies' (including electronic newsletters), targeting and profiling of online advertising
- conducting opinion and marketing polls
- arranging sales and marketing events
- arranging marketing competitions and prize draws
- the planning and development of Luotea's and its group companies' business operations and services
- customers' user identification and management and resolving errors in electronic services
- media communications

Data subject categories:	Decision-makers and contact persons of Luotea Group's business customers and business partners and subscribers of the Luotea newsletter
Data content of the register:	<p>The register contains the following personal data:</p> <ul style="list-style-type: none"> • name • title, profession, position or role within the company • company name • contact details (postal address, email address and telephone number) • age, year of birth, sex, native language and service language • LinkedIn profile details • consent and prohibitions concerning direct marketing • areas of interest (for example, the data subject's professional interests) and profiling details • data related to communications (for example, email messages, online chats, electronic service forms, chat messages and recording of phone calls) • data related to marketing and sales promotions (for example, marketing efforts targeted to the data subject and participation in surveys and events) • username and password to the electronic services • data concerning the use of electronic services and content (for example, browsing and search history, IP addresses and cookies) • possible additional information provided by the data subject
Regular sources of data:	<p>The data is primarily collected directly from the data subject by telephone, online, in meetings, upon the use of services or the conclusion of the agreement or during the contractual relationship.</p> <p>Personal data may be updated and retrieved via publicly available data sources such as company web sites, the trade register, other public and private registers and various service providers (such as Suomen Asiakastieto Oy).</p>
Regular disclosure and transfer of data:	<p>Data related to waste transportation are disclosed to municipal waste management authorities according to the law. Otherwise, the personal data are not regularly disclosed to third parties outside the group companies.</p> <p>Luotea reserves the right to transfer the data subject's personal data to Luotea's direct marketing register after the termination of the relevant connection.</p> <p>Luotea uses external service providers to process personal data for the following services:</p> <ul style="list-style-type: none"> • Systems maintenance, development (incl. testing) and troubleshooting; • maintaining data of business customers and business partners; • maintaining newsletter mailing lists and sending of newsletters; • recording of telephone conversations; and • maintenance and processing of data of event participants.

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 designated people have access to the data in the register to the extent required by their tasks.

Data retention period: The personal data in the register are stored for the duration deemed necessary for the purposes of the register while taking the statutory retention periods (arising from, for example, the Accounting Act and the Tax Prepayment Act) into account. The default retention period is five (5) years after the termination of the customer/contractual relationship (except insofar as is required longer by the law).

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 in 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

According to the General Data Protection Regulation data subjects have the right to object to or request a restriction on the processing of their personal data and to lodge a complaint regarding the processing of their personal data to the data protection authority.

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 and profiling. Such a prohibition can be set at any time by sending email to tietosuoja@luotea.com or, for example, by unsubscribing from the newsletter according to the instructions in the newsletter.