

# PRIVACY NOTICE – Website visitors

*Previous update: November 2021*

We at CapMan respect the privacy of all our stakeholders. Our privacy notices describe how we process personal data in accordance with the EU's General Data Protection Regulation ("**GDPR**").

This Privacy Notice applies to personal data of persons who visit on our website ("**you**").



## 1. Data controllers

The controller of your personal data is CapMan Plc and/or one or more of its group companies. Each CapMan group company is responsible for the processing of personal data in its own activities for the purposes and on legal bases set out in this Privacy Notice and may use the necessary personal data collected by other group companies for the same purposes.

## 2. Contact

If you have questions regarding this Privacy Notice or wish to exercise your rights, you may contact:

CapMan Plc  
Privacy Matters  
Ludviginkatu 6, 00130 Helsinki  
Email [privacy@capman.com](mailto:privacy@capman.com)

## 3. What personal data do we collect and process?

We generally collect and process the following types of personal data:

- Identity and contact details such as name, phone number, email address
- Information on the company you represent

- Technical data such as IP address, browser type, time zone setting and location, browser plug-in types and versions, cookie data, operating system and platform and other technology on the devices you use to access our websites
- Usage data such as information about how you use our website, products and services
- Marketing and communication data such as your preferences in receiving marketing from us and our third parties and your communication preferences

## 4. Why do we collect and process personal data?

Unless we specifically tell you otherwise before you submit personal information, we will only use it to:

- Respond to your questions or comments
- Better understand your viewing patterns and needs
- Help us understand how we can improve our products, services and website
- Share information
- Contact you to ask for your opinion or willingness to participate in certain events
- Send you updates and information on our products and services
- Deliver the subscribed releases

The processing of your personal data is based on a legitimate interest to provide you with the releases you have subscribed to, to answer your

enquiries, to ensure the functionality and security of our website and to develop our website.

We process your personal data for the purposes of responding to your contact requests, managing and developing our business and co-operation relationship with you, keeping you informed of us and our products and services and inviting you to events we organise, understanding the ways in which you and other visitors use our website and to develop our website, performing our customary administrative and organizational functions and for business development purposes.

## 5. What is the legal basis for processing?

Under data protection law, we need to have lawful grounds for processing your personal data. Sometimes more than one lawful ground applies. The legal basis for processing your personal data for the abovementioned purposes is our legitimate interest to answer your inquiries, provide you with the releases you have subscribed for, ensure the functionality and security of our website and to develop our website.

## 6. What are our information sources?

We collect personal data from you directly or through your interaction with our website (e.g. by using cookies). Information sources are used within the limits of the applicable laws, and your consent is requested when necessary.

## 7. How and with whom do we share personal data?

We may share your personal data between different entities within the Group for the abovementioned purposes. Further, we use services of various service providers and may transfer personal data to such third-party service providers. Such services may include e.g. IT services. If required by law or regulation, we may disclose personal data to authorities.

Sometimes we may need to transfer personal data outside the EU or EEA for instance because a service provider is in a third country. Such transfer would only be made (i) to a country in which the level of data protection is adequate for safeguarding the transferred personal data according to the EU Commission; (ii) using appropriate safeguards such as the EU Commission's standard contractual clauses in accordance with applicable data privacy laws and regulations; or (iii) if the transfer is specifically agreed upon with you.

## 8. How long is the personal data retained?

We store your personal data only as long as necessary for the purposes the data was collected for. When personal data is no longer needed for the purpose it was originally collected, it will be deleted or anonymized, unless we have a legal obligation to retain data for a longer period. This means that the retention periods vary depending on the processing purpose, type of personal data, and local requirements.

## 9. How do we ensure that your personal data is safe with us?

We implement technical and organizational security measures to protect personal data from loss, misuse, unauthorized access, disclosure, alteration or destruction. Only specific personnel of CapMan and of our third-party service providers are given access to personal data, and these employees and third-party service providers are required to treat this information strictly confidential.

## 10. What are your rights?

You are entitled to obtain information of your personal data that we process and have access to or obtain a copy of such personal data. You are also entitled to request us to correct, update or remove your personal data. To the extent required by applicable data protection law, you have a right to prohibit or restrict data processing and request data portability, i.e. transfer of your personal data in a structured, commonly used machine-readable format to you or to another data controller.

You should be aware that certain information is strictly necessary for the performance of a contract or for compliance with our legal obligations, which may set limits to some of the rights listed above. In

case the data processing is based on your consent, you may at any time contact us and revoke your consent. Withdrawal of consent does not affect the lawfulness of data processing before the withdrawal.

If you find your legal rights violated, you have the right to file a complaint with a competent authority. According to the GDPR you may lodge complaint in the EU Member State of your habitual residence, place of work or place of the alleged infringement.

Please send any requests regarding your rights to [privacy@capman.com](mailto:privacy@capman.com). We will answer to your request within one month of receipt of your request unless there are justified reasons to extend this time by two further months. If we cannot fulfil your request, e.g. due to our obligations, we will inform you in writing within the same time frame and explain to you the reasons why we are unable to fulfil your request. You can lodge a complaint with the supervisory authority if you disagree with our decision.

## 11. Updates to Privacy Notice

We may amend this Privacy Notice from time to time.