

STROMMA'S PRIVACY POLICY

1. GENERAL

Strömma Suomi Oy / Helsinki This Week (“**Stromma**”) respects and cares about your personal integrity. We want you to feel safe when we process your personal data. By way of this privacy policy (“**Privacy Policy**”), we want to inform you about how we ensure that your personal data is processed in the right way.

2. DATA CONTROLLER AND DATA PROTECTION OFFICER

Stromma is the data controller for the processing of your personal data and is responsible for ensuring that the processing is made in compliance with applicable law. You find our contact details on the last page of this Privacy Policy.

We have appointed a data protection officer (the "Data Protection Officer"). The Data Protection Officer has the task of overseeing that our use of personal data is in accordance with applicable law. The Data Protection Officer's contact details are privacy@stromma.com.

3. OUR PROCESSING OF YOUR PERSONAL DATA

At Stromma, we process your personal data to provide you with the best customer experience. That's why we use your personal data for the following purposes:

- Marketing, including customised offers,
- Method and business development.

Below you are provided with more information about e.g. why we process your personal data, which personal data we keep to achieve the purposes of the processing and for how long we store your personal data.

Purpose: Marketing, including customised direct offers. Method and business development.

What we do: We use your personal data within the scope of our market and customer analyses, consisting mainly of statistics, data from completed market segments and customer satisfaction assessments. The result of our analysis is then used as the basis for improving and developing the customer experience e.g. customise our website and / or app to your and other customers' wishes. However, we want to be clear that we always try to anonymise or pseudonymise your personal information as far as possible to achieve this purpose. We will also analyse your browsing behaviour on our website

Personal: Browsing behaviour and web browsing history; Demographic data.

Legal basis: Legitimate interest.

Retention period: We save and use your personal data for this purpose during the entire contract period and up to 36 months thereafter.

Your rights: You have the right to object to processing of your personal data based upon a legitimate interest as legal basis. If you object to such processing, we will

discontinue the processing or anonymise the data. Please see section 9 if you want to read more about your rights.

4. WHERE WE COLLECT YOUR PERSONAL DATA FROM

The personal data we process about you is the information you have provided us when visiting the helsinkithisweek.com website. We do not obtain any information from other sources.

5. AUTOMATED DECISION-MAKING

We do not use any automated decision-making which has significant effects on you.

6. FOR HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We only keep your personal data for as long time as necessary to achieve the purposes for which they were collected in accordance with this Privacy Policy. When we no longer need to save your personal data, we remove the data from our systems, databases and backups.

We may be required to keep your personal data for other reasons, such as to comply with legal obligations or to safeguard the parties' legal interest, or for any other important public interest.

7. WHO WILL PROCESS YOUR PERSONAL DATA?

Your personal data will only be processed within the Stromma Group, its IT-suppliers and parties with which Stromma cooperate to provide our services. We may also in certain cases be required to share your personal data with public authorities or other third parties in connection with court proceedings or other legal proceedings. We will not sell your personal data to any third party.

8. WHERE DO WE PROCESS YOUR PERSONAL DATA?

We endeavor only to process your personal data within the EU/EEA. In some cases, we may transfer your personal data to a country outside of the EU/EEA. If personal data is transferred to any such country, we will ensure that your personal data is protected and that the transfer is carried out in accordance with applicable law.

9. YOUR RIGHTS

9.1 Our responsibility for your rights

9.1.1 Stromma acts as the data controller responsible for ensuring that your personal data is processed in accordance with applicable law and that your rights have an impact on the processing. You may at any time contact us to exercise your rights. You find our contact details at the last page of this Privacy Policy.

9.1.2 Stromma is responsible for answering your request to exercise your rights within one month from our receipt of your request. If your request is complicated or if we have received a large extent of requests, we are entitled to prolong our response period

with another two months. If we assess that we cannot perform the actions you have requested, we will within one month explain why and inform you about your right to lodge a complaint with the data protection authority.

9.1.3 All information and communication, and all actions we carry out, is at no cost for you. If the action you request is manifestly unfounded or excessive, we are entitled to charge you an administrative fee to provide you with the requested information or carry out the requested action or refuse to meet your request.

9.2 Your right to access, rectification and erasure of personal data and restriction of processing

9.2.1 You have the right to request:

- a) Access to your personal data. This means that you have the right to request an abstract from our data record regarding our use of your personal data. You also have the right to request a copy of the personal information being processed at no cost. However, we may charge you a reasonable administrative fee to provide you with additional copies of the personal data. If you make your access request by electronic means such as email, we will provide you with the information in a commonly used electronic format.
- b) Rectification of your personal data. We will at your request, or at our own initiative, rectify, anonymize, erase or complement personal data that we discover is inaccurate, incomplete or misleading. You also have the right to complement the personal data with additional data if relevant information is missing
- c) Erasure of your personal data. You have the right to request that we erase your personal data if we do no longer have an acceptable reason for processing the data. Given this, erasure shall be made by us if:
 - (i) the personal data is no longer necessary for the purposes for which it was collected,
 - (ii) we use your personal data with your consent as legal basis, and you revoke the consent,
 - (iii) you object to such processing that is based on a legitimate interest, unless we have legal and legitimate reasons for to continue the processing.
 - (iv) the personal data has not been lawfully processed,
 - (v) we are required to erase the personal data due to a legal obligation, or
 - (vi) you are a child and we have collected the personal data in relation to the offer of information society services.

However, there might be requirements under applicable law, or other weighty reasons, that entail in that we cannot immediately erase your personal data. In such case, we will stop using your personal data for any other reasons than to comply with the applicable law, or the relevant weighty reason.

- d) Right to restrict processing. This means that we temporarily restrict the processing of your personal data. You have the right to request restriction of the processing when:
 - (i) you believe your information is incorrect and you have requested rectification in accordance with section 9.2.1 b) above during the time period we are verifying the accuracy of the data,

- (ii) the processing is unlawful and you do not want the personal data to be erased,
- (iii) we, in capacity of data controller, do no longer need the personal data for the purposes for which it was processed, but you need them for the establishment, exercise or defence of legal claims, or
- (iv) you have objected to the processing in accordance with section 9.3 below during the time period we determine whether our interests override yours.

9.2.2 At Stromma, we will take all reasonable actions to notify any recipients of your personal data as set out in section 7 above regarding any rectification, erasure or restrictions of your personal data after you request us to do so. At your request, we will also inform you of which third parties we have shared your personal data with.

9.3 Your right to object to the processing

9.3.1 You have the right to object to such processing of your personal data based upon our legitimate interest or public interest (please see section 3 above). If you object to such processing, we will only continue with the processing if we have a legal and legitimate reasons to continue the processing.

9.3.2 If you do not want Stromma to use your personal data for direct marketing, you are always entitled to object to such use by contacting us. Once we have received your objection, we will discontinue using your personal data for this marketing purpose.

9.4 Your right to revoke your consent

For the processing where we use your consent as a legal basis (see section 3 above), you may withdraw your consent at any time by contacting us. You can find our contact information at the bottom of this Privacy Policy. If you revoke your consent, you may not be able to use our services as intended.

9.5 Your right to portability

You have the right to portability. This means that you have the right to receive certain of your personal data in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller. You only have this right when your personal data is processed by automated means and our legal basis for the processing is your consent or the performance of a contract between you and Stromma. This means e.g. that you have the right to receive and transfer all personal data that you have provided us with when booking.

9.6 Your right to lodge a complaint with the data protection authority

You have the right to lodge any complaints regarding our processing of your personal data with the data protection authority.

10. WE PROTECT YOUR PERSONAL DATA

You shall always feel safe when providing us with your personal data. Therefore, Stromma has implemented appropriate security measures to protect your personal data against unauthorized access, alteration and erasure. In the case of a security breach that may significantly affect you or your personal data, e.g. when there is a risk of fraud or identity theft, we will contact you and inform you of what you can do to reduce this risk.

11. **COOKIES**

At Stromma, we use cookies at our webpage and in our services to improve your user experience.

Stromma uses cookies to collect information about the terminal devices used by visitors to the helsinkithisweek.com. The primary purpose of cookie use is to improve and accommodate the visitor's use experience on these sites as well as to perform analysis and further develop the sites.

Information collected with the aid of cookies is anonymous by nature. Taking into consideration the requirements of privacy protection legislation, it is, however, possible to connect data collected with cookies and other techniques to personal information possibly gathered from the user in some other context. Information collected with the aid of cookies is also utilised to target communications and marketing as well as to optimise marketing measures. Cookies can help collect information on how and when a site is used, identifying, for example, the website from which a visitor transferred to our site, what webpages the visitor has browsed and when, what the visitor viewed and clicked on our site, what browser the visitor uses and other information concerning the terminal device of the visitor. Users can block the use of cookies by changing their browser settings. Blocking cookies may affect the functionality of the website or its components. Cookies or the other techniques we employ will not damage the user's terminal device or files.

12. **AMENDMENTS TO THIS PRIVACY POLICY**

Stromma has the right to amend this Privacy Policy at any time. When we make any amendments that are not only linguistic or editorial, you will be provided with clear information of the amendments and which impact they will have on you before the amendments are effective. If we need your consent to fulfil our obligations to you and you do not agree to the changed terms, you may terminate the contract with us before the terms come into force.

13. **CONTACT INFORMATION**

Do not hesitate to contact us at Stromma if you have any questions regarding this Privacy Policy, our processing of your personal data, or if you want to exercise your rights.

Strömma Suomi Oy, company registration number 1928483-2

Email: privacy@stromma.com

Webpage: helsinkithisweek.com