

Privacy statement for private customer and marketing register
Updated 31 December 2025

Joint controllers:	<p>Luotea plc and all group companies belonging to the same group in Finland (hereinafter "Luotea")</p> <p>Companies belonging to Luotea group: Luotea plc (1680140-0) Luotea Siivous Oy (3155982-7) Luotea Kiinteistöhuolto Oy (3155934-1) Luotea Kiinteistötekniikka Oy (3155933-3)</p> <p>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.</p>
Contact details in matters concerning the register:	<p>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</p>
Name of the register:	<p>Luotea group private customer register</p>
Legal basis for the processing of personal data:	<p>The legal bases for the processing of personal data are the legitimate interest of the Luotea (customer relationship, Luotea newsletter subscription or another similar relevant connection) and a contract between the Luotea's group company and data subject.</p>
Purpose of the processing of personal data:	<p>Personal data in the register shall be processed for the following purposes:</p> <ul style="list-style-type: none">• the management, maintenance, development, analysis of the contractual relationship between Luotea and the private customer and creating statistics related to this relationship• production of services• inspection of credit details• invoicing and the collection and monitoring of payments• customer communications• direct Luotea's marketing (including electronic newsletters), online marketing targeting and profiling• conducting opinion and marketing surveys• arranging marketing competitions and prize draws• the planning and development of Luotea's business operations and services
Data subject categories:	<p>Luotea private customers and Luotea newsletter subscribers</p>

Data content of the register:

The register contains the following personal data:

- name
- contact details (postal address, email address and telephone number)
- identification data (such as customer number and personal identification number)
- title, profession, age, year of birth, sex, native language, size of household and mode of living
- start and termination date and method of the customer ship
- data related to the management of the customer ship (for example, data concerning product and service orders, purchases, suspensions, cancellations, deliveries, customer feedback and complaints)
- data concerning invoicing, payments and collections and credit details
- data related to communications (for example, email messages, online chats, chat messages, electronic service forms and recordings of phone calls)
- data related to marketing and sales promotions (for example, marketing efforts targeted to the data subject)
- areas of interest provided by the data subject
- consent and prohibitions concerning direct marketing
- data concerning the use of electronic services and content (for example, browsing and search history, IP address and cookies)
- profiling data generated with analyses of data retrieved from the use of the service and provided by the customer (for example, possible areas of interest or belonging to a certain category of customers)
- possible additional information provided by the data subject

Regular sources of data:

The data is primarily collected directly from the data subject upon the use of services and websites, by telephone, in meetings or upon the use of other services and the conclusion of the agreement.

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

Regular disclosure and transfer of data:

Data related to waste transport is disclosed to municipal waste management authorities to the extent required by law. Otherwise, the personal data is not regularly disclosed to third parties outside the Luotea group companies.

Luotea reserves the right to transfer the data subject's personal data to Luotea's marketing register after the termination of the relevant connection.

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

- Systems maintenance, development (incl. testing) and troubleshooting;
- maintaining newsletter mailing lists and sending newsletters; and
- recording of telephone conversations.

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 sufficient level of data security. Each person using the register has a personal username and password to the system. Only designated people shall 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 Consumer Protection Act, 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

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 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.

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 an email to tietosuoja@luotea.com or, for example, by unsubscribing from the newsletter according to the instructions in the newsletter.