



VALMET AUTOMOTIVE

Privacy Statement	1/5
Final v.1.1	
General Data Protection Regulation	Valmet Automotive DPO
Stakeholder register	April 10, 2019

PRIVACY NOTICE FOR VALMET AUTOMOTIVE'S STAKEHOLDER REGISTER

PRIVACY STATEMENT

Valmet Automotive Group ("Valmet Automotive") is committed to protecting your privacy and processing your personal data in accordance with good data processing practice and applicable laws and regulations. We adhere to continuously improving our operations and carry out regular risk management measures to ensure data security.

This Privacy Notice includes the following information:

- Who is the data controller and how can you contact us?
- Data security and processing principles.
- What personal data is collected and why?
- How long will your data be stored?
- Where is your data transferred to?
- How is your personal data protected?
- How can you exercise your data subject rights?
- The right to lodge a complaint with a supervisory authority.
- Alterations to this notice.

WHO IS THE DATA CONTROLLER AND HOW CAN YOU CONTACT US?

The data controller is Valmet Automotive Inc.

Valmet Automotive has appointed a Data Protection Officer, who may be contacted through email at privacy@valmet-automotive.com.

In case of questions, you may also contact our local business line contact address.

Vehicle manufacturing	fin.privacy@valmet-automotive.com
Engineering business line	ebf.privacy@valmet-automotive.com
Roof business line, Osnabruck	osn.privacy@valmet-automotive.com
Roof business line, Zary	dane.osobowe.pl@valmet-automotive.com



VALMET AUTOMOTIVE

Privacy Statement	2/5
Final v.1.1	
General Data Protection Regulation	Valmet Automotive DPO
Stakeholder register	April 10, 2019

Contact details for Valmet Automotive's head office are:

PO Box 4

Autotehtaankatu 14

FI 23501 Uusikaupunki, Finland

Tel. +358204848111 (Switchboard)

DATA SECURITY AND PROCESSING PRINCIPLES

- We only collect necessary personal data for predefined purposes and we do not disclose your personal data to third parties without a proper data processing agreement signed by both parties.
- As a data subject, you are informed of how your data is processed. Personal data is primarily collected directly from the individual concerned.
- Before processing personal data, we determine whether and to what extent the processing is necessary to achieve the predefined purpose.
- All personal data has a lifecycle and processing activities are defined in all phases. When personal data comes to the end of its lifecycle, it is deleted in an appropriate manner.
- We strive to ensure that personal data is correct, complete and kept up to date.
- All personal data are classified within Valmet Automotive and secured with appropriate security measures.

We do not make automated decisions or conduct profiling based on your personal data.

WHAT INFORMATION IS COLLECTED AND WHY?

We only collect personal data for predefined purposes. We do not collect any excess personal data that is not necessary to fulfil the predefined purposes. If the predefined purposes cease to exist, we delete the respective personal data.

Personal data related to stakeholders, vendors and suppliers

With respect to collaboration and partnership, our main purposes to collect personal data are:

- Establish, maintain and develop the partnership and collaboration
- Establish a register of our stakeholders, vendors, contractors and suppliers.



VALMET AUTOMOTIVE

Privacy Statement	3/5
Final v.1.1	
General Data Protection Regulation	Valmet Automotive DPO
Stakeholder register	April 10, 2019

The processing is based on the following legal grounds:

- Performance of a contract.
- Legal obligations.

The personal data collected and stored in the stakeholder register are primarily collected from the applicant and/or their employer. Personal data can be collected from the following sources:

- Agreement between Valmet Automotive and the stakeholder, vendor or supplier.
- From the data subject him/herself.

The collected data includes some or all of the following:

- Name of the data subject.
- Contact details including phone number and email address.
- Job title.

HOW LONG WILL YOUR DATA BE STORED?

Personal data is stored in accordance with the legal requirements of local and European Union level regulation. Personal data related to the stakeholder register is deleted after the agreement with the parties and the legal obligations to retain them has ended.

WHERE IS YOUR DATA TRANSFERRED TO?

Your personal data may be transferred outside the EU/EEA area. We primarily process your personal data inside EU/EEA area, but we cannot exclude the possibility of processing in third countries due to system provider's technical access. The processing is done with appropriate safeguards implemented such as using standard data protection clauses approved by the European Commission.

We use processors to provide us with technical platforms and systems to process all relevant data efficiently. Processors process personal data on technical level, such as providing us support in case of problems and/or malfunction in the system. If they need to process personal data, they will conduct it under our instructions and only under a valid data processing agreement. The processors are never allowed to process personal data for their own purposes. We expect the processors to ensure the same level of security as we provide for our own processing activities.



VALMET AUTOMOTIVE

Privacy Statement	4/5
Final v.1.1	
General Data Protection Regulation	Valmet Automotive DPO
Stakeholder register	April 10, 2019

HOW IS YOUR DATA PROTECTED?

Access to personal data is managed by local identity and access management system. The collected personal data are accessible only to selected employees or subcontractors who have a business need to access the personal data. All persons with access are properly trained and have the necessary awareness level to process the information in a safe and secure way. Each of these persons has further a non-disclosure commitment in relation to the information that they receive while accessing the database. In order to protect personal data, we operate a systematic security program that constantly improves our security practices.

Personal data in physical form:

Personal data collected during the lifecycle of the agreement between Valmet Automotive and their stakeholders is not stored in a physical form.

Personal data in electronic form:

Personal data in electronic form is stored in the Valmet Automotive data systems or our subcontractors' data systems. All data systems and applications are secured by hardware and software-based methods of protection. Such measures include, but are not limited to, logical (and physical) access control, monitoring, vulnerability scans, firewalls and server security hardening.

HOW CAN YOU EXERCISE YOUR DATA SUBJECT RIGHTS?

You have the right to request for the fulfilment of your data subject rights at any time. Your data subject rights include the following:

- Right of access to your personal data.
- Right to rectification.
- Right to erasure ("right to be forgotten").
- Right to restriction of processing.
- Right to data portability.
- Right to object the processing of your personal data.

All data subject right requests should be made through email, delivered to the person and/or entity in charge of processing the personal data (see "How can you contact us?").

If the processing of personal data is based on your consent, you have always the right to revoke the consent. The consent revocations should be made through email, delivered



VALMET AUTOMOTIVE

Privacy Statement	5/5
Final v.1.1	
General Data Protection Regulation	Valmet Automotive DPO
Stakeholder register	April 10, 2019

to the person and/or entity in charge of processing the personal data (see "How can you contact us?").

All requests related to data subject rights will be handled in accordance with applicable legislation.

THE RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITIES

You have always the right to lodge a complaint related to our processing of your personal data with the data protection authority in the EU Member State of your habitual residence.

The data protection authority in Finland is the Office of the Data Protection Ombudsman. The authority may be contacted for example via email at tietosuoja@om.fi.

ALTERATIONS TO THIS NOTICE

We reserve the right to alter this Privacy Notice by informing of such changes internally on the internal intranet pages (for internal data subjects) and on the company's external web page (for the external data subjects). We recommend that our data subjects read this Privacy Notice on regular basis to keep track of possible changes.