

TIKLI GROUP – PRIVACY POLICY

Data Controllers and Contact Information

Tikli Group Oy (1954482-5), Yhdystie 40, 62800 Vimpeli, Finland

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Central contact channel for data protection matters:
team.tietosuoja@tikli.com

General

This is the privacy policy in accordance with the EU General Data Protection Regulation (hereinafter "GDPR") concerning the companies of the Tikli Group (Tikli Group Oy and Honpumet Oy). Hereinafter, "Data Controller" refers to the group company in each situation whose customer relationship or activity, service performance, order delivery, or marketing is concerned.

This privacy policy explains how the Data Controller processes the personal data of its customers and potential customers or their representatives/contacts, its suppliers' representatives, and users visiting its websites.

Purpose and Legal Basis of Personal Data Processing

The purpose of personal data processing is:

- Managing and administering customer and supplier relationships, and delivering services and products
- Maintaining the online store and managing and delivering online store orders
- Invoicing orders (including payment monitoring and collection, as well as accounting)
- Marketing services/products, newsletters, and business development
- Responding to inquiries and handling contact and feedback forms on websites.
- Ensuring, maintaining, and developing the functionality of websites, and analysing website performance.

The legal basis for personal data processing under the GDPR is:

- **Contract, where the data subject is a party, and its execution when it concerns.**
 - The customer relationship of a private individual or orders for services and products, including online store orders.
- **The data subject's consent when it concerns.**
 - Responding to inquiries and feedback
 - Sending newsletters
 - The operation of non-essential cookies



- **The Data Controller's legitimate interest when it concerns.**
 - The customer relationship of an organization or orders for services and products, including online store orders, and managing supplier relationships (legitimate interest in conducting business)
 - Marketing and business development (legitimate interest in promoting business)
 - The operation of cookies essential for the functionality of websites (legitimate interest in transmitting a message in a communication network and ensuring security)
- **The Data Controller's legal obligation when it concerns.**
 - Processing personal data included in accounting records (Accounting Act, 1336/1997)
 - Processing personal data related to fulfilling obligations under the Act on the Contractor's Obligations and Liability (1233/2006)

Personal data is not used for automated decision-making or profiling.

Categories of Personal Data Processed

The Data Controller processes the following personal data:

- Private customers: name, address, phone number, email address.
- Business customers: name of the company's representative/contact person, (work) phone number, (work) email, information on position/title.
- Other customer information: delivery and billing history and details, complaints, warranty matters, discounts, and other commercial information.
- Suppliers: name of the supplier's representative, phone number, email, any other personal data related to obligations under the Act on the Contractor's Obligations and Liability.
- Other supplier information: delivery and billing history and details, complaints, warranty matters, discounts, and other commercial information.
- Website visitors: information collected by cookies used on our websites, such as IP address.

Providing personal data is not a statutory or contractual requirement. However, providing certain personal data is a prerequisite for entering into a contract between the Data Controller and the data subject or the organization represented by the data subject, as well as for the Data Controller to perform services or deliver orders.

Regular Sources of Personal Data

The Data Controller primarily obtains personal data concerning data subjects from the data subjects themselves or from the organization they represent during the validity of the customer or supplier relationship, as well as during the performance of services and/or delivery of orders, for example, by phone or email. The Data Controller also obtains information



through its website's contact and feedback forms. The Data Controller may also obtain information from authorities and public (official) registers, such as the YTJ information service.

Regular Disclosures of Personal Data

The Controller does not, as a rule, disclose the personal data of data subjects to third parties.

If necessary and based on applicable legislation or authority orders, personal data may be disclosed to authorities to the extent permitted by law. Personal data may also be disclosed within the same group of companies as the Controller if necessary for administrative reasons.

Certain necessary personal data may also be disclosed to the following third parties:

- Subcontractors, to ensure delivery.
- Transport companies, if the chosen delivery method is shipping.
- Payment intermediaries, when paying by card
- Credit providers, if the customer chooses invoice or instalment payment by a credit company.
- Invoice operators, when invoice is selected as payment method.
- Credit insurance providers, to reduce credit losses.
- Customs, when purchasing products tax-free
- Debt collection agencies, when invoices are overdue and transferred to collection.

The Controller ensures a high level of data security and protection when disclosing and processing information. When the Controller uses subcontractors or external service providers (i.e. personal data processors) to process personal data on behalf of the Controller, the processors may use personal data only according to the Controller's instructions. Processors are not entitled to use the disclosed data for their own purposes.

Transfer of Personal Data Outside the EU or EEA

As a rule, personal data is not transferred outside the EU or EEA. However, some processors and/or their sub-processors used by the Controller may be located outside the EU or EEA. In such cases, the Controller ensures the level of data protection by confirming that the European Commission has issued an adequacy decision for the country (so-called adequacy decision), or by requiring the processor to accept the standard contractual clauses approved by the European Commission as part of the agreement between the Controller and the processor.

Retention Periods for Personal Data

The Controller retains personal data only for as long and to the extent necessary for the purposes described in this privacy notice, with the following specifications:

- Customer and Supplier Relationships: Personal data related to customer and supplier relationships is retained for the duration of the respective relationship and at least for



the duration of any warranty obligations and/or complaint handling. Personal data related to relationships deemed to have ended is deleted annually.

- **Online Store Orders:** Personal data related to online store orders is retained at least for the duration of warranty periods and/or complaint handling, so that the Controller can fulfil its obligations related to warranties and complaint processing.
- **Billing and Accounting:** Personal data included in accounting records is retained for the current year plus up to ten (10) years from the end of the financial year to which the accounting material pertains.
- **Payment Monitoring and Collection:** Personal data related to payment monitoring and collection is retained for as long and to the extent necessary to manage and complete the collection process.
- **Cookies:** Information about the collection and retention of cookies is provided in more detail on the Controller's website.

Rights of the Data Subjects

The data subject may exercise the rights described below by contacting the Controller (see contact details at the beginning of this privacy notice). The Controller will inform the data subject of the actions taken in response to the request, generally within one month of receiving the request. The Controller will also inform the data subject if the request cannot be fulfilled for any reason. To exercise these rights, the Controller may need to request additional information from the data subject to verify their identity.

Right of Access

The data subject may request information from the Controller on whether their personal data is being processed and request access to the personal data collected about them. The data subject has the right to receive a copy of their personal data.

Right to Rectification

The data subject may request the Controller to correct or complete their personal data if it is inaccurate, incorrect, or incomplete.

Right to Erasure

The data subject may request the Controller to delete their personal data under the conditions set out in the data protection regulation, for example, if the data is no longer necessary for the purposes for which it was collected. However, the Controller may not be able to delete the data in all cases if its retention is required by law or has another legal basis.



Right to Restrict Processing

The data subject may request the restriction of processing in certain situations defined in data protection legislation, such as when the accuracy of the data is contested, in which case processing is restricted while the Controller verifies the accuracy.

Right to Object

The data subject may object to the processing of their personal data if the processing is based on the Controller's legitimate interest. In such cases, the Controller may no longer process the data unless it can demonstrate compelling legitimate grounds that override the data subject's rights.

Right to Withdraw Consent

If the processing of personal data is based on the data subject's consent, the data subject may withdraw their consent at any time. If consent has been given for the use of cookies, it can be withdrawn via the cookie notice and page available on the website.

Right to Data Portability

Under certain conditions defined in data protection legislation, the data subject may request the Controller to provide them with their personal data in a structured, commonly used, and machine-readable format and to transmit that data to another controller.

Right to Lodge a Complaint with a Supervisory Authority

The data subject may lodge a complaint with the national supervisory authority if they believe that the Controller is not processing personal data appropriately or is not adequately fulfilling the data subject's rights. In Finland, complaints can be submitted to the Data Protection Ombudsman at <https://tietosuoja.fi/en/notification-to-the-data-protection-ombudsman>.

Changes to the Privacy Notice

The Controller may update this privacy notice, if necessary, due to changes in its operations or applicable legislation.

Significant changes regarding the processing of personal data will be announced on the Controller's website and/or, where possible, by email.

This privacy notice was last updated on 05.03.2025.

