

# Privacy statement for customers

This privacy statement (hereinafter 'Statement') describes how Aztec Nordic Ltd processes personal data of customers and potential customers. For the purposes of this Statement, the term 'person' refers to all natural persons whose personal data are in the customer data file of Aztec Nordic Ltd.

## 1. DATA CONTROLLER AND DATA PROTECTION OFFICER

Data controllers:

Oy Aztec Nordic Ltd Ab

Address: Gropintie 6, FI-10600 TAMMISAARI

Telephone: +358 40 849 7781

Data Protection Officer: Jörgen Gustafsson

Address: Gropintie 6, 10600 Tammisaari, Finland

Email: jorgen.gustafsson@aztecnordic.fi

Telephone: +358 40 849 7781

## 2. PURPOSE AND LEGAL BASIS OF PERSONAL DATA PROCESSING

Personal data are processed to create and manage the customer relationships between persons and Aztec Nordic Ltd. We use personal data for purposes such as the following:

- obtaining and managing customer relationships
- delivering, processing and archiving orders
- developing the operations of Aztec Nordic Ltd and the services of Aztec Nordic Ltd and third parties providing services to Aztec Nordic Ltd
- improving customer experience
- analytics and statistical purposes
- generating more personalized, targeted content and marketing
- sending newsletters
- managing events and campaigns
- implementing marketing bans, as defined in legislation
- preventing abuse
- providing better customer service

Data are processed either based on the data subject's express consent, the exercise of the data controller's legitimate interests or statutory obligations, or for the preparation or implementation of an agreement between the customer and Aztec Nordic Ltd.

In situations where the processing is based on a legitimate interest, Aztec Nordic Ltd has performed a balance test and assessed that the interests or fundamental rights and freedoms of a person requiring the protection of personal data do not override the legitimate interest of Aztec Nordic Ltd. A legitimate interest may arise if there is an appropriate relationship between the person or the organization represented by the person and Aztec Nordic Ltd, which may arise, for example, on the basis of a customer agreement.

The interests and fundamental rights and freedoms of persons are respected, no personal data belonging to special categories of personal data are processed, and the processing activities are predictable for persons.

Personal data are protected against unauthorized access or processing by the safeguards described in section 5.

## 3. COLLECTING PERSONAL DATA AND CATEGORIES OF PERSONAL DATA PROCESSED

Personal data may be collected in different ways; generally, however, we collect personal data directly from persons themselves or from companies with which customer agreements have been entered into.

The processing purposes covered by this Statement require that the personal data we collect, and process is limited to the following:

- **contact details and basic information**, such as name, email address, telephone number
- **the person's employer or other organization**; contact details, such as address and telephone number
- **information on the person's role in the organization**
- **information on the customer relationship**, such as offers, agreements, feedback

#### **4. DISCLOSURES OF PERSONAL DATA TO THIRD PARTIES**

We may disclose personal data within Aztec Nordic Ltd. Another company or foundation belonging to the Aztec Group of companies may also process your personal data on our behalf. This processing is based on our legitimate interest to transfer personal data for intra-group administrative purposes, such as for reporting purposes, and to conduct our business efficiently, such as using centralized payment systems.

We may disclose some necessary data to third parties that we use as service providers or subcontractors, for example, to guarantee delivery or for marketing, event organization and customer relationship management. We use trusted contractual partners whose contracts include the requirements imposed by the EU GDPR and other legislation.

If necessary, we also disclose data to public authorities. We always inform the customer of information requests if this is permitted by law.

We transmit data to the following third parties:

- analytics and statistics partners
- partners in organizing events
- parties supplying customer relationship management functionalities
- email marketing partners if the customer has opted in for a newsletter or if the newsletter can under law be delivered without consent
- transport company if the delivery method chosen is delivery to a pick-up point, the nearest post office or the customer's address
- invoice operator
- debt collection company if an invoice falls due and is transferred to a collection company
- other necessary service providers or subcontractors

Third parties include the following entities and their subcontractors:

- Azets Insight Oy
- Google LLC
- Microsoft Corporation

Third parties and their subcontractors may transfer personal data even outside the EU or the European Economic Area. In these situations, the applicable legislation (such as the EU Data Protection Regulation) and its requirements, such as the standard contractual clauses (SCC) adopted by the European Commission, are complied with.

Whenever data are transferred and processed, Aztec Nordic Ltd will ensure a high level of data security and protection in accordance with the EU GDPR.

We do not process the personal data processed in accordance with this Statement outside the EU or the EEA.

#### **5. DATA FILE PROTECTION**

We take appropriate measures (including physical, technical and administrative measures) to protect personal data from loss, destruction, misuse and unauthorized access or disclosure. In each case, access to personal data is restricted to persons who need the data for the performance of their duties. Access to information systems containing personal data requires a user-specific username and password. Written material is stored in locked cabinets and archived material is stored in filing cabinets.

Aztec Nordic Ltd stores customer information inside the European Union. Data centers, the technical security of the store systems and the data security of all processes are of high quality. Servers are protected against data breaches and denial-of-service attacks.

Everyone who handles personal data has a duty of confidentiality regarding all personal data.

Note that even appropriate measures cannot prevent all possible security breaches. In the event of a personal data breach, we will notify you in accordance with applicable law.

#### **6. STORAGE, ARCHIVING AND DESTRUCTION OF PERSONAL DATA**

Personal data are only stored as long as is necessary for the purposes defined in this Statement.

Personal data will be deleted when their storage is no longer necessary for the implementation of the law or the rights or obligations of either party.

## **7. RIGHTS OF THE DATA SUBJECT**

A person has the right of access to personal data concerning him or her and the right to obtain confirmation as to whether or not personal data concerning him or her are being processed. You may also request rectification, updating or deletion of your personal data at any time. Please note, however, that personal data necessary for the purposes specified in this Statement or for which the law requires storage cannot be deleted.

You have the right to object to or restrict the processing of your personal data to the extent required by applicable law. Restricting processing means that personal data, with the exception of storage, may only be processed with your consent, to establish, exercise or defend a legal claim, or to protect the rights of another person, or for reasons of important public interest. You have the right to request restriction of processing, for example, if you dispute the accuracy of your personal data. In this case, we will restrict the processing for the period during which we can verify the data.

You may object to the processing of your personal data on grounds relating to your particular situation when the data are processed for the performance of a task of general interest or for the performance of Aztec Nordic Ltd or third parties' legitimate interests. At that time, we may process your personal data only if there is a significant and justifiable reason for the processing that overrides your interests, rights and freedoms, or if the processing is necessary for the establishment, exercise or defense of a legal claim.

In certain cases, you have the right to transfer the personal data you have provided to us from one system to another, i.e., the right to receive your personal data in a structured, commonly used, machine-readable format and transmit your personal data to another controller, in accordance with applicable law.

When we process your personal data on the basis of consent, you have the right to withdraw your consent at any time. We will not process the personal data thereafter unless there is another legal basis for processing.

However, the withdrawal of consent will not affect the lawfulness of the processing carried out before the withdrawal.

You can exercise your rights by sending a request to [jorgen.gustafsson@aztecnordic.fi](mailto:jorgen.gustafsson@aztecnordic.fi).

If you feel that the processing of your personal data is not appropriate, you have the right to lodge a complaint with the national supervisory authority, the office of the Data Protection Ombudsman; contact details here: <https://tietosuoja.fi/etusivu>.

## **8. USE OF AUTOMATED DECISION-MAKING AND PROFILING**

The processing of personal data by Aztec Nordic Ltd covered by this Statement does not currently utilize automated decision-making, such as profiling.

## **9. USE OF COOKIES ON AZTEC NORDIC LTD'S WEBSITES**

Aztec Nordic Ltd uses cookies and other similar technology, such as the browser's local storage. Cookies are small text files exchanged between the user's browser and a server. Cookies and other identifiers are valid for a specified period, after which the browser will remove the identifier. We use this technology to enable functions, personalize content as well as for analytics and targeted marketing.

Functional cookies and local storage are used for purposes such as identifying customers. For these purposes, the use of cookies and local storage is required, and users must consent to it. Functional cookies and local storage variables placed by the server are stored in the user's browser for a period ranging from 15 minutes to 24 months, unless they are deleted through the browser settings. When the user re-visits the website, cookies and local storage variables are placed on the device again if allowed by the browser.

We treat data as personal to the extent that the identifier includes data that identifies the customer, such as an IP address. Identifiers that have been linked to the customer in some way are also treated as personal data.

Identifiers used for analytics and targeted marketing are valid from 30 seconds to 24 months.

Users can opt out of the identifiers used by our analytics and marketing partners by turning the 'Do Not Track' function on in their browser and setting the browser to reject third-party cookies.

## **10. CHANGES TO THE STATEMENT**

We have the right to amend this Statement. Registered customers will be informed of any significant changes to the privacy statement when terms and conditions are updated. The latest version of this Statement can be found at <https://www.mastercoat.eu/privacy-policy>.

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