

PRIVACY POLICY

Secto Automotive Oy customer and user data file

1. GENERAL

This Privacy Policy describes how Secto Automotive Oy (“Secto” or the “controller”) processes personal data. The Privacy Policy applies to our website, marketing activities and customer relationship management, as well as to the processing of personal data related to products and services we provide. In addition, this privacy statement also applies to the processing of personal data via a surveillance camera installed at Secto's premises, such as car dealerships. We may have security cameras on our premises that can automatically record and record pictures/videos of you when you visit our premises. Such recordings may contain your personal data if such images or videos allow us to identify you. Security cameras are positioned in such a way that they do not describe the public space surrounding our premises, but only the vehicles we sell. We do not use automated facial recognition or similar technologies to identify an individual as a result of the processing of biometric data.

We comply with applicable data protection legislation in all our personal data processing. Data protection legislation refers to applicable laws on data protection, such as the EU General Data Protection Regulation (2016/679) and the Finnish Data Protection Act (5 December 2018/1050). Data protection concepts not defined in this Privacy Policy are interpreted in accordance with data protection legislation.

Our services and websites may also contain links to external websites and services operated by other organisations. This Privacy Policy does not apply to such services and websites, and we encourage you to read their privacy statements before using them.

“Personal data” means any information that concern natural persons (“data subjects”) from which a person can be identified, directly or indirectly, in the manner described in more detail in the EU GDPR.

2. CONTROLLER AND DATA PROTECTION OFFICER

Controller: Secto Automotive Oy
Business ID: FI2113572-1
Address: Näsintie 27, FI-06100 Porvoo, FINLAND
Email: it@secto.fi

Contact details of the Data Protection Officer:
Jani Rantanen

3. PURPOSES AND LAWFUL BASIS FOR THE PROCESSING OF PERSONAL DATA

We process personal data for the following purposes:

- delivering products and services, concluding customer contracts and fulfilling orders (contractual relationship or its preparation, legitimate interest)
- customer service and communication and customer satisfaction surveys (legitimate interest, consent, contractual relationship)
- billing, credit decisions and debt collection (legitimate interest)
- marketing, including market research, other marketing promotion and analysis, and the production of statistics and measurements on the effectiveness of marketing and combining and updating personal data for direct marketing purposes (legitimate interest, consent)
- direct marketing, including electronic direct marketing and telemarketing, as well as planning and measuring the effectiveness of advertising and marketing, and combining and updating personal data for direct marketing purposes (legitimate interest, consent)
- management of stakeholder and subcontractor relations and cooperation with service providers (legitimate interest, contractual relationship or its preparation)
- improving the user experience of our website and other services and monitoring user traffic (consent)
- carrying out legal obligations (such as activities related to accounting and taxation) and reporting obligations (compliance with a legal obligation)
- internal and Group-level reporting and other internal administration (legitimate interest, compliance with a legal obligation)
- processing of warranty and liability matters and complaints and conducting legal and official proceedings (compliance with a legal obligation)
- Customer due diligence (KYC) compliance and process management (compliance with a legal obligation)

- preventing and investigating abuses and ensuring data security and the safety of persons and property (legitimate interest, compliance with a legal obligation)

The lawful basis of our processing for the purposes of delivering products and services, concluding customer contracts and fulfilling orders and their related obligations is the performance of a contract or its preparation.

The lawful basis for processing personal data may also be the legitimate interest of the controller or a third party. For example, processing for the purposes of managing customer relationships, customer communications, reporting, processing complaints and legal proceedings is based on a legitimate interest. In all processing based on legitimate interest, Secto Automotive Oy ensures that the processing is proportionate to the interests of the data subject and that the data is processed for purposes that meet the reasonable expectations of the data subject. Upon request, we will provide further information on how we process personal data based on our legitimate interest.

Regarding to camera surveillance, the legal basis for processing personal data is legitimate interest. The processing is necessary for the protection of property against theft, unauthorised access to data or other activities carried out with the intent to cause harm, and for the prevention and investigation of criminal offences.

In the case of new customers, certain marketing measures, such as marketing to private customers through electronic channels, are based on the explicit consent of the data subject. For existing customers, we may send electronic direct marketing based on our legitimate interest when the marketing concerns the direct marketing of products or services belonging to the same group of products.

When we process personal data in order to comply with legal obligations or to fulfil some specific reporting obligations, the lawful basis for processing is primarily compliance with a legal obligation. For example, the processing of personal data for the purposes of the KYC process is based on a legal obligation.

4. AUTOMATED DECISION-MAKING AND PROFILING

The processing of personal data does not include automated decision-making or profiling.

5. CATEGORIES OF PERSONAL DATA AND SOURCES OF DATA

Category of personal data	Examples of data content
Identifying and contact information	<p>The system stores the name, email address, phone number, street address, postal code and city as basic information about customers/contact persons of the customer businesses, potential customers and representatives of potential customers.</p> <p>For contact persons of customer businesses or potential customer businesses, the system stores the contact person's position in the company and the name and identifier of the represented business (business ID or equivalent).</p> <p>In connection with the establishment of a customer relationship, the system also stores the customer's personal identity code, vehicle registration number and user IDs used in Secto Automotive's systems.</p> <p>For users of vehicles managed by Secto, the system stores the following personal data: name, home address, city and postal code, phone number, email address, personal identity code, role (vehicle user/decision-maker). For business customers, the system stores information about the company and the vehicle's details and registration number.</p>
Driver Assistant-service	<p>For the Driver Assistant service, the name, telephone number and e-mail address of the data subject, the registration number of the vehicle and the start and end date of the contract, the duration of the contract in months, the additional services available in the contract, the contract period, the mileage included in the contract, the</p>

	<p>kilometers at the start of the contract, manual driver's logbook enabling the user to record driving events (date of insertion, mileage driven, start and initial kilometers, type of driving (work/leisure), starting and starting point, data contributor and tyre storage location. Real-time location data is collected if the data subject has given their consent.</p> <p>Vehicle information: make, model, CO2 emissions, motive power, registration certificate, contract status.</p> <p>Mobile refuelling: refueler's phone number (registered in the app), registration number, refuelled product, refuelling company (e.g. Neste), place of refueling, name of filling station, litres refueled.</p> <p>Additional Juhlapesu service: registration number, user's phone number, washing time, selected wash and name of washing place.</p>
Fleet Manager-service related Data	<p>For the Fleet Manager service, the following are processed: service usernames and passwords, company information, basic information related to the car, dealership information (seller's name, phone number, email, dealership address), vehicle user information (name, phone number, email, home address)</p> <p>Contract related information: vehicles awaiting delivery: order information: estimated or confirmed delivery date, type of contract (e.g. Secto Open Maintenance Leasing).</p> <p>Valid contracts: registration number, vehicle identification number, make and model of the car, date of first registration, vehicle category (passenger car, van, truck, trailer, etc.), motive power, CO2 emissions, user company,</p>

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Information
marked
with an
asterisk is
mandatory.

	<p>user company's cost center, driver, contract model (e.g. Secto open maintenance leasing), start and end date of contract, contract length in months, remaining contract months residual value, leasing lease, maintenance budget monthly, account management fee monthly, total monthly instalment.</p> <p>Additional maintenance services (whether there is a substitute car right, substitute car category), kilometers included in the contract, latest mileage quotation (e.g. information received from the last service invoice, or reported by the customer himself), finance company, insurance company, insurance deductible, free text field for additional information. Depending on your rights, you can see your company or group information.</p>
Data on the use of websites and other digital services	IP address, electronic communication identification data, search and browsing data, browser and operating system data and registration data
Data related to KYC process	Information related to identification, such as personal identification number, official document collected for the verification of customer identity, corresponding information on beneficial owners of the company, corresponding information on politically exposed persons (PEPs) linked to the company.
Image and video recordings	Materials for on-site surveillance cameras

We collect personal data directly from data subjects, for example in connection with a service transaction, or when the data subject buys or

orders our products or services, either on the data subject's own behalf or on behalf of the organisation being represented, or in connection with registration to a service, when the data subject visits our website or other digital services, uses our digital services such as Driver Assistant service, subscribes to our newsletter, responds to a customer satisfaction survey or otherwise contacts us. We also receive personal data from other external sources, such as private registry services (f.ex. Bisnode Finland Oy) and registers maintained by the authorities.

6. RETENTION OF PERSONAL DATA

We store personal data for as long as necessary to fulfil the purposes specified in the Privacy Policy and always for the period required by law (for example, responsibilities and obligations related to accounting or reporting), or for the purpose of resolving a legal case or similar dispute. After the end of the purpose of use, personal data is deleted or anonymised within a reasonable period of time. We do not store outdated or unnecessary data. We strive to ensure that your personal data is up-to-date and correct.

Image and video recordings are generally stored for 3 days to 24 months, depending on the purpose of processing and the location of the office in question. Due to situations that endanger property or safety, we may retain camera and video recordings for a longer period of time if this is necessary for the establishment, exercise or defence of legal claims.

Upon request, we will provide additional information on our practices for storing personal data.

7. RECIPIENTS OF PERSONAL DATA

Personal data may be disclosed between companies belonging to the same group as the controller in accordance with the requirements of data protection legislation for the purposes described in this privacy statement.

In processing personal data, we may also use various service providers and other third parties, such as providers of technical solutions or server space and accounting and financial management service providers. In using third parties to process personal data, we enforce the contractual clauses required by data protection legislation.

We may disclose personal data to third parties in situations required by law or the authorities, or in order to investigate abuses and to ensure safety. Personal data may also be disclosed to an insurance company. In addition, we may be required to disclose personal data in connection with litigation or similar legal proceedings. In connection with the sale of vehicles, information about the vehicle's service history may be disclosed to the buyer.

Personal data may also be disclosed with the consent of the data subject in cases of parking errors or similar payments to the operator responsible for parking control.

If the controller or a company belonging to the same group as the controller is involved in a merger, business transaction or other corporate transaction, personal data may be disclosed to other parties to the arrangement or to parties assisting in the arrangement.

Secto may disclose to a finance company information it has collected for customer due diligence purposes (so-called customer due diligence KYC data) for the financing decision. The controller also acts as a processor on behalf of finance companies in certain situations. In these cases, the processing of personal data is subject to the data protection policies of the finance companies.

Personal data may also be disclosed to car manufacturers and importers. In this case, the disclosure of personal data takes place between two controllers and is based on legitimate interest. In these cases, the car manufacturer or importer is an independent controller of the data it receives and is responsible for its own processing of personal data. In this case, the data protection policies of the car manufacturer or importer are applied to the processing of personal data.

Upon request, we will provide additional information on the recipients of our disclosures of personal data.

8. TRANSFER OF PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA

We do not transfer personal data outside the EU/EEA.

9. PROTECTION OF PERSONAL DATA

Data security and the protection of personal data are of utmost importance to us. We use appropriate technical and organisational safeguards to protect personal data. Personal data stored by us is protected by technical and organisational means. We store data on servers and systems that are protected by firewalls, passwords, and other technical measures. Access to personal data is granted only when necessary for the processing of the data. Individuals who process personal data are bound by professional secrecy on matters related to the processing of personal data.

10. RIGHTS OF DATA SUBJECTS

Data subjects have rights to their personal data in accordance with data protection legislation. However, the application of rights in each individual case depends on the purpose and situation of the processing.

- **Right of access to personal data.** Data subject have the right to receive confirmation as to whether their personal data is being processed as well as other information on processing as referred to in data protection legislation. Data subjects have the right to receive a copy of their personal data.
- **Right to rectification of personal data.** Data subjects have the right, with certain restrictions, to demand that incorrect or inaccurate data be rectified or erased.
- **Right to erasure of personal data.** Data subjects have the right to request the deletion of their personal data in accordance with the conditions of data protection legislation. Upon request, we will delete personal data unless the law or any other applicable exception in accordance with data protection legislation requires us to retain the data.
- **Right to restrict processing.** Data subjects have the right, within the conditions specified in data protection legislation, to request restrictions on the processing of personal data in certain situations.
- **Right to transfer personal data.** Data subjects have the right to request the transfer of their personal data to another controller. In principle, the right to transfer applies to personal data which the data subject has provided to the controller in a structured and machine-readable form, and which is processed based on the data subject's consent or contract, and/or which are processed automatically.
- **Right to object to processing.** Data subjects have the right, within the conditions specified in data protection legislation, to object to the processing of personal data based on legitimate interests, including profiling. We may refuse such request if processing is necessary to satisfy the compelling and legitimate interests of the controller or a third party. However, data subjects always have the right to object to the processing of personal data for direct marketing purposes and for profiling related to direct marketing.
- **Right to withdraw consent.** If the processing of personal data is based on the data subject's consent, the data subject has the right

to withdraw consent to the processing of their personal data. Withdrawal of consent has no effect on previous processing.

Exercise of the data subject's rights

We hope that you will contact us if you have any questions regarding the processing of your personal data.

You can send a request to exercise your rights as the data subject by letter or email to the addresses listed in this Privacy Policy.

We will verify the identity of the person making the request before processing the request. We will respond to requests within a reasonable time and, in principle, within one month of sending the request and verification of identity. If the request cannot be granted, we will notify you of this separately.

11. RIGHT TO LODGE A COMPLAINT WITH THE SUPERVISORY AUTHORITY

Data subjects have the right to lodge a complaint with the competent data protection authority if they feel that their personal data has been processed in violation of data protection legislation.

Contact information of the Finnish Data Protection Authority can be found [here](#).

12. CHANGES TO THE PRIVACY POLICY

This Privacy Policy may need to be amended from time to time. The changes may also be based on changes in data protection legislation. We therefore recommend that you revisit this Privacy Policy regularly for any changes. The latest version is available on our website.

This Privacy Policy was published on 2023/11/6.