

### Privacy policy in accordance with the Data Protection Act (1050/2018)

#### 1. Controller

Leppäkosken Lämpö Oy  
Business ID: 0840218-6  
Address: Eino Salmelaisen katu 23, 39500 Ikaalinen  
Phone: +358 3 45 031 or +358 3 450 3399  
[www.leppakoski.fi](http://www.leppakoski.fi)

Contact person in matters pertaining to the personal data file  
Oili Tuomisto, assistentti  
[oili.tuomisto@leppakoski.fi](mailto:oili.tuomisto@leppakoski.fi)  
Phone: +358 44 750 3305  
[www.leppakoski.fi](http://www.leppakoski.fi)

#### 2. Name of data file

Leppäkosken Lämpö Oy's client and marketing registers.

#### 3. The purpose of the processing of personal data

The personal data file controller or a partner authorised by the controller uses the data included in the data file in accordance with the Personal Data Act for the following purposes:

- construction, use and maintenance of district heat and natural gas networks
- delivery and maintenance of district heat and natural gas connections
- energy delivery, metering and network services
- payment of compensations, invoicing, monitoring and collection of charges
- maintaining and developing customer relationships
- the development of the controller's business operations for the production of the service

#### 4. Data content of the register

Customer data

- name, age or date of birth
- social security number or business ID
- contact information (phone, address, billing address, email address)
- bank details
- language code
- other data acquired with the customer's consent, which may be required for implementing the aforementioned functions

Consumer unit information

- name
- address
- type of housing
- date concerning the connection
- data concerning the energy consumption
- data concerning the effectiveness

Other information

- property data (property ID, name of property, owner, capacity, completion year)
- customer analysis data
- billing data
- consumption data
- direct marketing ban data
- identification and log data related to the use of the website
- other data acquired with the customer's consent, which may be required for implementing the aforementioned functions

#### 5. Regular sources of data

The data are acquired from customers in connection with, for instance, requests for quotations, competitions, raffles, contracts, websites, chat conversations or other contacts. Customer telephone calls may be recorded in order to verify a customer service event and to develop the quality of services. Telephone call recordings are stored for 6 months.

Data may also be collected, stored and updated between the customer and marketing registers, and from the registers of the Digital and Population Data Services Agency, Suomen Asiakastieto Oy, the National Land Survey of Finland, or another register controller providing a similar service. The data are also updated based on the communications concerning the electricity market published by Finnish Energy.

#### 6. Duration of personal data storage

Leppäkoski stores personal data for a period that is necessary, depending on the data type and their purpose. Storage periods vary based on data type and classification. Leppäkoski regularly resets and reassesses the personal data in its possession. When the data is no longer needed, Leppäkoski deletes it or renders it unidentifiable as soon as possible.

The data of interest group contact persons are stored in accordance with the company's archiving practices. Job application data are stored for 24 months from the conclusion of the recruiting process or arrival of an open job application.

#### 7. Regular data disclosures

Data are not regularly disclosed to external parties outside Leppäkoski Group or its systems suppliers. Data may be disclosed to authorities in accordance with the laws in force.

#### 8. Data transfer outside the EU or the EEA

In principle, data are not transferred outside the EU or the EEA. If, for reasons related to systems engineering, data need to be transferred outside the EU or EEA, we only use Privacy Shield certified suppliers.

#### 9. Principles of data protection

The data systems are protected with firewalls, passwords and other technological means. The persons who need the data to perform their work duties have personal user IDs and passwords for accessing the systems. They are obligated to observe non-disclosure regulations in accordance with the laws and instructions in force. Paper material containing manually processed personal data is stored in locked facilities with surveillance.

#### 10. Right to access, prohibit the processing of and rectify data

In accordance with Section 26 of the Personal Data Act, a person included in the personal data register has the right to access and inspect the data on him/her and to request the rectification of erroneous data. Requests for access and rectification may be made on the website [www.leppakoski.fi](http://www.leppakoski.fi) and at Leppäkosken Lämpö Oy's offices in Ikaalinen in the address Eino Salmelaisen katu 23, 39500 Ikaalinen.

According to Section 30 of the Personal Data Act, a data subject has the right to prohibit the use of personal data for the purposes of direct marketing, distance selling, opinion polls, as well as public registers or genealogical research. If a data subject considers his/her statutory rights to have been violated, he/she may submit a complaint with the Data Protection Ombudsman; the contact information of the ombudsman is available at <https://tietosuoja.fi/en>