PRIVACY NOTICE

Shopping centre AINOA's customer and marketing data file
Compiled on 20 May 2024.

1. CONTROLLER

Kiinteistö Oy Biens and Tapiolan Toimitalo Oy /
Shopping centre AINOA
Länsituuli 5
FI-02100 Espoo

2. CONTROLLER'S CONTACT PERSON

Ria Leppävuori
Marketing Manager,
Shopping centre AINOA
ria.leppavuori@lahitapiola.fi

3. TARGET GROUP OF REGISTRATION

Customers interested in the shopping centre's news items, marketing and services; and the shopping centre's tenants.

4. PURPOSE OF USE OF THE DATA FILE, AND THE BASIS FOR THE PROCESSING

The controller processes customers' personal data in accordance with data protection legislation.

Personal data are collected, processed and used for the purpose of following up the customer relations of the shopping centre's customers; providing and maintaining the services; direct marketing; the targeting of advertising; customer interaction management; opinion and market polling; and monitoring and analysing the shopping centre's use and visitor habits. In addition, data can be used for statistical purposes, and for the purposes of the development of the shopping centre's services.

The controller uses cookies on its website. Cookies are small text files that a browser saves on the user's computer or terminal device when using the internet. First of all, cookies are used to collect statistics on the use of the websites. The controller also uses cookies for marketing to be able to monitor the use of the several different websites. These cookies are used to compile profiles about the data subjects' search and browsing behaviour. Furthermore, the controller uses cookies to monitor the data subjects'

browsing methods and activities. The controller uses the data collected to display targeted content to the data subjects. The website cookies may be delivered and used by the controller or a third-party providing network analytics services, including Google Analytics or Meta. The data subject may prohibit or accept the use of cookies on the website.

The processing of personal data is based on contract, the controller's legitimate interest and/or the data subject's consent. When processing is based on a legitimate interest, the legitimate interest includes, among other things, the controller's need to market products and its services effectively as well as service development. Processing may be based on a legitimate interest to ensure legal protection and security, protect data and property and prevent and investigate criminal offences and other misuse.

The controller may use external service providers or subcontractors for the implementation of the processing activities described in the notice. These service providers process personal data on behalf of the controller for the purposes set out in this privacy notice.

Personal data will not be used for any automatic decision-making that would have legal or similar effects on the data subjects.

5. DATA FILE'S REGULAR SOURCES OF DATA

The personal data collected in the customer database are either provided by the data subject personally or collected and compiled while visiting the shopping centre. The data given by the data subject may be supplemented with data available from other sources or with data derived from such sources.

We collect personal data directly from the data subject in connection with the following activities:

- subscribing to the newsletter
- registering for the staff's own mobile application
- responding to customer polls and surveys
- participating in contests and raffles
- providing feedback through the AINOA website
- shopping with us in the controller's shopping centre and the other facilities belonging to it
- visiting the controller's website, and
- when data subjects are in contact with the controller by other means.

The Population Information System, for example, may be used for updating personal data, to form a target group for marketing.

6. DATA CONTAINED IN THE DATA FILE

The following data, among others, may be saved about the data subject:

- Personal data and contact details: first name, last name, email address, sex, address, postcode, telephone number, age/year of birth, language and profession
- Customer relationship-related data: newsletter subscription format, particular interests, customer feedback, contacts made, contest response data, and an indication of being a member of the shopping centre's staff
- Data on the equipment and connection used: equipment identity, operating system, IP address and cookies
- Other possible data collected with the data subject's consent
- Marketing data: marketing letter sending dates, and copies of the letters

7. REGULAR DISCLOSURE OF DATA; TRANSFER OF DATA OUTSIDE THE EU OR THE EEA

Shopping centre AINOA will not disclose data to third parties for marketing purposes. However, data may be disclosed in connection with the sale, transfer or other disposition of a site or business. Due to the technical or operational implementation of the processing of data, some data may be located with our subcontractors and data may be processed via a technical interface. In these cases, we always ensure appropriately that the personal data of the shopping centre's customers are processed with care and in compliance with data protection legislation.

In the processing of personal data, shopping centre AINOA may use service providers that may have access to the personal data from outside the EU/EEA area, including from the United States. Data may be transferred outside the European Union or the European Economic Area based on a decision by the European Commission on the adequacy of data protection in the target country. Shopping centre AINOA ensures the appropriate and lawful implementation of transfers in accordance with the legislation governing the processing of personal data.

Shopping centre AINOA has verified that all its service providers comply with data protection legislation. We regularly use the following service providers:

- MailChimp (newsletter)
- Google Analytics
- Meta (Facebook and Instagram)
- Microsoft (email)
- Surveypal
- HyperIn
- Avarn Security (CCTV).

Data may be disclosed to competent authorities, for example, for carrying out their statutory duties or preventing abuses.

8. THE DATA SUBJECT'S RIGHTS

Every data subject has the right to know what data about the data subject have been saved in the data file, and the right to request rectification of incorrect data and erasure of the data subject's personal data. In certain cases, the data subject also has the right to restrict the processing of data or object to the processing of data. Requests to access, rectify and erase data and any other notices and requests related to this section must be submitted in writing to the controller mentioned in this file description, and the request must be signed personally. The data to be given to the data subject following an access request will be provided in writing or in a commonly used and machine-readable format and will be supplied by post or electronically to the address notified by the person concerned.

The data subject also has the right to give and withdraw consent for electronic direct marketing or to entirely prohibit electronic direct marketing. The data subject has the right to lodge a complaint with the competent supervisory authority if the data subject considers that data protection legislation has not been respected in the processing of the data subject's personal data. In Finland, the Data Protection Ombudsman is the supervisory authority.

9. PROTECTION OF THE DATA FILE

All AINOA staff as well as the subcontractors and other service providers acting on behalf of the shopping centre are under an obligation of confidentiality in respect of all customer and stakeholder data. The data are mainly stored in an electronic format. Use of the data file is protected by user-specific IDs, passwords, and access rights. Obsolete and unnecessary data are destroyed in an appropriate manner. Both electronically stored data and data stored in a manual format are also protected by organisational methods.

10. STORAGE AND DESTRUCTION OF PERSONAL DATA

Unless the data subject withdraws the consent that the data subject has given, the data collected in the data file will be stored for as long as storing of the data may be considered necessary in view of their described purpose of use, or for the maximum period of time permitted by legislation. When an email newsletter subscriber uses the 'Unsubscribe' function, that person's all data will be removed from the data file within seven days. The 'Unsubscribe' function can be found in every AINOA newsletter.

The personal data contained in customer feedback are anonymised automatically within 126 days (18 weeks) if the feedback is not erased from the service manually earlier.