

# ENABLERS ADVISORY OY

## PRIVACY NOTICE

The following explains the general principles relating to how Enablers Advisory Oy (“**Enablers**”, “**we**” or “**us**”) collects and processes personal data. We undertake to keep your personal data safe and to process it appropriately in a manner that respects your privacy.

### **What personal data does Enablers collect and process?**

We collect personal data on our clients, their counterparties and other parties to the assignments that we handle, as well as their representatives and beneficial owners, our current and previous employees, job applicants and representatives of our contract parties and other partners (hereinafter referred to as “Data Subjects”).

We collect, among others, the following personal data:

- Data Subjects’ name and contact information;
- information on our engagements and their performance;
- information required by the laws and regulations addressing anti-money laundering and prevention of terrorism financing and sanctions, or by other mandatory laws and regulations;
- information provided in the job applications or employment contracts as well as other information relating to recruitment or employment relationship.

### **Why does Enablers collect and process personal data?**

We collect and process personal data primarily in order to be able to onboard and perform our engagements. Under the Act on Anti Money Laundering and Prevention of Terrorism Financing, we are generally required to verify the identity of our clients and of their representatives and beneficial owners and to obtain information on the nature and purpose of the client- or business relationship. When we take on an engagement, we must also always ensure that we do not have conflict of interest when performing the engagement. Therefore, we collect and process personal data to identify our clients, to avoid conflicts of interests and to fulfil our other obligations under the applicable laws and regulations.

We may also collect and process personal data for the purpose of being able to keep contact with our clients and to market our services to prospective clients.

We collect and process personal data of our employees for the purposes of performing our obligations under their employment contracts and addressing our other duties as employer. Job applicants' personal data is collected and processed to evaluate the job applicants and to make recruitment decisions.

We may also collect personal data on our suppliers and other contract parties in order to be able to perform our contractual obligations and to take care of the contractual relationship.

## **What information sources do we use?**

Personal data is primarily collected from the Data Subject himself/ herself or from his/her employer entity. Personal data may also be collected from public and other sources, such as the Finnish Trade Register and Insolvency Register, company registers of other jurisdictions and the registers maintained by credit rating companies, such as Suomen Asiakastieto Oy.

## **How and with whom may my personal data be shared?**

We do not generally share personal data with third parties except where required to do so to perform our duties or to fulfil our legal obligations.

We keep personal data and our electronic archives in cloud based services provided by third-party service providers. These service providers may also process personal data on our behalf. We have entered into agreements with these service providers to ensure that the data is protected and processed in an appropriate manner.

We share personal data of our employees with the tax authorities, insurance companies providing their insurance coverage and the

employee health care providers in accordance with our legal and contractual obligations. In connection with a suspicion of money laundering, terrorism financing or market abuse we may also have an obligation to share personal data of our clients with the competent authorities.

## **Is my personal data processed abroad?**

We process and retain personal data only in Finland and in the other Member States of the European Union or the European Economic Area. We do not transfer personal data to third countries that do not belong to the European Union or the European Economic Area.

## **How long is the personal data retained for?**

Personal data is retained until it is no longer needed for the purpose for which it has been collected or until the Data Subject withdraws his/her consent to the processing of the personal data and we no longer are obliged to retain it.

Unless otherwise instructed by the client, we retain client correspondence and other documents in an electronic format for ten years following the completion or termination of the engagement, after which we may delete the material without notice to the client.

## **What are the rights of the data subject?**

Upon request of the Data Subject, we will provide information on what and how his or her personal data is processed, correct any inaccurate or incomplete personal data and delete data which we no longer are required to process or retain.

Each Data Subject has a legal right to review the personal data that we have collected on him or her as well as the right to request that his or her data is updated, rectified or erased, or that the processing be restricted on the grounds provided by law. We may deny such a request only if we have a legal obligation to do so.

Where we process personal data based on the Data Subject's consent, the Data Subject is entitled to request that his or her data is transferred to another data controller. The Data Subject may also prohibit us from using his or her data for marketing purposes.

To exercise the above rights, the Data Subject should send a written request by email to the address provided below. Should the Data Subject believe that we have not appropriately complied with the applicable data protection regulations, the Data Subject has the right to file a complaint with the data protection authorities.

## **Update of the privacy notice of Enablers**

This privacy notice has been last updated in October 2023. The privacy notice is updated from time to time to ensure that it meets the requirements of the applicable laws and regulations and the policies and practices applied by Enablers. You can always find the updated privacy notice and privacy policy on this webpage.

## **DETAILS OF THE CONTROLLER**

Enablers Advisory Oy (Finnish Business ID 2961191-3)

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