

Data Protection Description for IT Project Systems

Data subjects

- Representatives of clients of Pöyry PLC and its affiliates (“Pöyry”)
- Pöyry PLC’s and its affiliates’ (“Pöyry”) employees
- Other individuals as required by the nature of the project

Data content

Identity related information: Name, Company, E-mail address, Phone number

Purpose of processing

Data is collected to ensure data security and to provide access to Pöyry’s IT project systems. The legal purpose for processing the data is Pöyry's legitimate interest. Data security and access control enables Pöyry to secure its material and intellectual property. Data security and access also protects the data of the system users. The logs provide the possibility to investigate data breaches and leaks. Pöyry has evaluated that it will not violate individuals’ rights to collect this data.

Transfer of data

Data is transferred within Pöyry. Data is also transferred to external subconsultants and vendors (such as Pöyry's document management service provider) when they process personal data on behalf of Pöyry. All data transfers are covered by agreements as required by law.

Pöyry is present in the following countries: Armenia, Australia, Austria, Brazil, Cambodia, Canada, Chile, China, Czech Republic, Finland, France, Georgia, Germany, Hungary, India, Indonesia, Italy, Jordan, Laos, Malaysia, Mexico, New Zealand, Nigeria, Norway, Peru, Philippines, Poland, Portugal, Russia, Saudi Arabia, Singapore, South Africa, Spain, Sri Lanka, Sweden, Switzerland, Tajikistan, Thailand, Turkey, United Arab Emirates, United Kingdom, United States, Uruguay, Vietnam.

Pöyry may also provide its services in other countries in which case the personal data is transferred to those countries strictly on a need to know basis. The data security and privacy are always taken into account in international transfers.

Transfer of data outside EU

Data is transferred in systems used within Pöyry also outside EU/EEA as described above. EU Commission standard contractual clauses are mainly used to ensure safe international transfer of personal data.

Retention period

The data of Pöyry’s IT project system users is stored for as long as Pöyry has ongoing projects and/or valid agreements with the company that the individual is/was representing. After the expiry of the respective project, the personal data will be kept for 20 more years. Pöyry has evaluated that it has a legitimate interest to keep personal data for this period due to needs of business continuity and to managing claims relating to projects/agreements that arise after projects/agreements are closed. Pöyry has evaluated that it will not violate individuals' rights to keep their data for this period.

Rights of individuals

The right of access

An individual may access his/her data by submitting a detailed request via email to privacy@poyry.com.

The right to rectification

An individual may rectify his/her data by submitting a detailed request to privacy@poyry.com and he/she should do this if Pöyry holds inaccurate data regarding him/her.

The right to erasure

An individual may ask to erase his/her data by submitting a detailed request to privacy@poyry.com.

The individual may ask to erase his/her data if:

- the data is no longer needed for its original purpose and no new legal purpose exists;
- the processing is based on the individual's consent and the individual withdraws the consent;
- the individual objects the processing, and Pöyry has no overriding grounds for continuing the processing;
- the data has been processed unlawfully; or
- erasure is necessary for compliance with EU law or the national law of the relevant Member State.

The right to restrict processing

An individual may ask to restrict the processing of his/her data by submitting a detailed request to privacy@poyry.com.

The individual may ask to restrict the processing of his/her data if:

- the individual contests the accuracy of the personal data;
- the data is processed based on legitimate interest of Pöyry;
- he/she thinks that the processing is unlawful; or
- Pöyry no longer needs the personal data but the individual requires the data to establish, exercise or defend a legal claim.

The right to data portability

An individual may ask to transport his/her data by submitting a detailed request via email to privacy@poyry.com.

The individual may ask his/her data to be transmitted to another controller if:

- the personal data is processed by automated means;
- the data subject has provided the personal data to Pöyry; and
- the basis for processing is contractual necessity.

The right to object

An individual may object the processing of his/her data processed based on legitimate interest of Pöyry by submitting a detailed request via email to privacy@poyry.com.

The right to contact data protection authority

An individual has the right to contact the relevant data protection authority regarding the processing of his/her data.

Data security measures

Pöyry is committed to securing personal information. Pöyry protects the confidentiality and security of information by using physical, electrical and administrative controls. All personal data is collected only for legitimate purposes and not processed in a manner that is incompatible with those purposes. The amount of data is minimized to what is necessary and not stored for longer than is necessary for the purposes. The personal data is kept up to date and protected against unauthorized or unlawful processing and against accidental loss, destruction or damage with the available appropriate technical or organisational measures. Pöyry's systems are protected from unapproved external access. Access to systems containing personal data is controlled via approval processes that consider the person's role and justified business need. The use of the system and access to information is limited on an individual level and protected by using personal user access rights.

**Data controller**

Pöyry PLC and its affiliates
Jaakonkatu 3
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Finland

Contact information of the data controller

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