



Data Protection Description for Client Personal Data

Data subjects

Representatives of clients of Pöyry PLC and its affiliates ("Pöyry").

Data content

Data content that is processed is listed below.

Contact Name, Contact Owner, Client Contact Department, Is Bounced email (Y/N), No longer in the company (Y/N), Competitor (Y/N), Direct marketing denied (global unsubscribe (Y/N)), Email subscription record and details, Contact Main Sector & Contact Focus Sector, Description field (may contain record of communication with Contact), Phone number, E-mail address, Employer, Contact Position in their organisation, Title, Work address, Responsibility Area in Contact organisation, Role Category in Contact organisation, Food allergies/diet, Browsing history at selected Pöyry websites and responses to email communication, Link to LinkedIn profile, Brief notes about sales-related meetings and phone calls with Pöyry contact, Lead score (how active the Contact is with interacting with Pöyry), Lead source (how Contact arrived at Pöyry's website), Association with marketing campaigns (events, newsletters and services), Opportunities related to Contact and Contacts role in opportunities), Contacts responses to Pöyry's client feedback survey, chat content (internal communication regarding the contact).

Purpose of processing

Client data is collected and maintained for the primary purpose of managing Pöyry's client relationships and for conducting justified and legitimate business. Additional purposes for the collection and maintenance of client data are business reporting, marketing activities and sales activities. The legal purpose for processing the data is Pöyry's legitimate interest.

Transfer of data

Data is transferred within Pöyry. Data is also transferred to external subconsultants and vendors (such as Pöyry's CRM 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 used to ensure safe international transfer of personal data.

Retention period

The data is stored in accordance with the principles described in this data protection description and for as long as Pöyry has ongoing projects and/or valid agreements with the company that client contact is /was representing.

After the expiry of all ongoing projects and valid agreements with the Company that the Client contact is / was representing, 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 development, future sales, reporting and business analysis 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. The kept data does not include sensitive data as defined by the General Data Protection Regulation.

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

01620 Vantaa

Finland

Contact information of data controller

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