

Data Protection Description for Project Personal Data

Data subjects

- Pöyry PLC's and its affiliates' ("Pöyry") employees
- Representatives of business partners (e.g. consortium partners and subconsultants) and service providers of Pöyry
- Other individuals as required by the nature of the project

Data content

Pöyry's business partners' and service providers' representatives: Contact information, Roles and Responsibilities in the respective project.

Pöyry employees and subconsultants Professional information (CV) such as: Name, Photo, Job title, Work/project experience, Education, Language skills, Other skills listed by the data subject, Country of permanent residency, Nationality, Professional association, Learning history, Publications, Awards. Pöyry may also ask the data subjects to provide also their: Civil status, Date of birth, Passport number, Limited health information (e.g. certificate of received vaccination) or Other similar information. The need to transfer sensitive data as defined by the EU General Data Protection Regulation is always evaluated case by case and secure transmission is used.

Other individuals: as required by the nature of the project such as:

- Personal data needed to ensure the identity of the individual and the compliance with the local legislation when working on a worksite
- Personal data available in public registers e.g. regarding estate owners
- Personal data needed to apply for a permit or certificate
- Personal data in organisation charts

All this personal data together is hereafter referred to as "Project personal data".

Purpose of processing

Project personal data is collected to enable Pöyry to perform its business. CVs are processed to be able to provide Pöyry's potential clients with the same. Pöyry employees' data is collected to record who has drafted the drawings, plans or other documents which Pöyry provides its clients. Business partners' and service providers' data is collected for the business purpose to handle the relationship with the said parties.

The legal purpose for processing the business partners' and service providers' data is contractual necessity and after the ending of the contract Pöyry's legitimate interest. The employee's data is processed based on Pöyry's legitimate interest. Pöyry has an interest to know who has designed the drawings, plans or other documents which Pöyry provides its clients. The risk to an individual employee is small, because the personal information included contains only person's name, initials and/or email address. Personal data of other individuals is processed based on legal requirements or Pöyry's legitimate interest. The amount of data processed is minimised and stored in a secure manner. Pöyry has evaluated that it does not risk the privacy of the individuals to hold the respective personal 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.

Information is provided to Pöyry's clients as a part of Pöyry's proposals or as part of other documentation relating to a project when required to win or complete the project. Work contact information of Pöyry employees might also be published on Pöyry's websites in order to provide clients or potential clients a contact person for specified Pöyry's business related matters.

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 business partners' and service providers' representatives 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.

The data of Pöyry employees is kept as long as the drawings etc. where the information is included are valid and in use.

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

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Contact information of the data controller

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