

## Data protection description and information notice

### 1. Controller

Scala Fund Advisory (being an integral part of CapMan Plc, Business ID 0922445-7)  
("Scala")  
Ludviginkatu 6, 4 fl., 00130 Helsinki, Finland  
Tel. +358 207 207 500

### 2. The person in charge

Mia Laakso  
Ludviginkatu 6, 4 fl., 00130 Helsinki, Finland  
Tel. +358 207 207 500  
Email: mia@scala-advisory.com

### 3. Name of the register

Marketing register of Scala

### 4. The purpose of the use of the register

This register is used for the purposes of:

- i) contacting, maintaining, using, developing, and updating Scala's business relationships; and
- ii) sending newsletters related to the co-operation.

### 5. Contents of the register

The register includes contact information related to Scala's business relationships or prospect relationships such as: name, position, title, address, email address, and telephone number, employer data and other associated information on the co-operation with Scala.

### 6. Regular sources of information

Personal data is collected from the data subjects themselves or from publicly available resources by Scala or its representative in connection with the mutual or prospected co-operation.

## **7. Regular destinations and transfer of data**

The data is not transferred outside Scala unless specifically agreed upon the transfer with the data subject, except for the transfers of data as per request of competent authorities having legal access to the information.

The data will not be transferred to countries outside European Union or European Economic Area, unless specifically agreed upon the transfer with the data subject.

## **8. The principles for security of the data file and register**

The security of the data files complies with Finnish law and Scala's data protection practices. Only defined individuals have the access to the data files by using their personal username and password.

## **9. Right to access and rectification**

An individual being a data subject is entitled to have access to the registration data concerning him or her in the register. Such individual shall make a request to this effect to the person in charge of Scala's register mentioned in item 2 above through a personally signed letter. Scala will provide a written extract of the information stored in the register concerning the individual.

The individual being the data subject has the right to request that data provided by him or her for registration purposes be corrected by contacting the person mentioned in item 2.

## **10. Other rights relating to the use of personal data**

The individual has the right to deny Scala to use his or her personal data for the purposes listed in the Section 30 of Finnish Personal Data Act. The written denial shall be sent to the person mentioned in item 2.