# SCALA FUND ADVISORY PRIVACY POLICY

Last updated 25 May 2018

## 1 INTRODUCTION

This document describes how Scala Fund Advisory Oy (hereinafter "**Scala**") processes the personal data of Scala's business partners' representatives and contact persons, as well as representatives and contact persons of prospects. Scala acts as a controller to such personal data.

As a controller, Scala is responsible for such personal data, and for the processing of such personal data. Protecting your privacy and your personal data is of utmost importance to Scala. We at Scala are committed to complying with the requirements of data protection regulation applicable to us in the processing of your personal data. The means and purposes of processing of Scala's business partners' representatives and contact persons as well as personal data of prospects' representatives and contact persons are described in this Privacy Policy.

## 2 DATA CONTROLLER AND CONTACT PERSON

### Data Controller

Scala Fund Advisory Oy
(Business ID: 28764272)
Eteläinen Makasiinikatu 4 A (5th floor)
00130 Helsinki

### Contact Person

Julia Kim
c/o Scala Fund Advisory Oy
Tel.: +44 7795 538013
Email: Julia@scala-advisory.com

## 3 LEGAL BASES FOR PROCESSING AND PROCESSING PURPOSES

Processing of personal data is based on the following legal bases:

– Data subject's consent under applicable legislation;

– Compliance with a legal obligation to which Scala is subject;

– The performance of a contract between the data subject or an organization represented by the data subject and Scala or a relevant connection between them, or another legitimate interest of Scala or a third party (such as current or future business partners, suppliers or clients). A legitimate interest may be, in particular:

(i) Targeted and direct marketing and other communications between the data subject and Scala;

(ii) Management and development of the business relations;

(iii) Other legitimate business purposes, such as Scala's service development.

Personal data is processed in particular for the following purposes:

(i)    Contacting the data subjects or entities represented by the data subjects;

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<tr><td>(ii)</td><td>The provision of services ordered by the data subject or an organization represented by the data subject, and the execution of obligations related to the provision of the services;</td></tr>
<tr><td>(iii)</td><td>Invoicing and keeping track of the accuracy of invoicing;</td></tr>
<tr><td>(iv)</td><td>Taking care of, managing and developing business relations and other relevant connections comparable to such relations as well as our services;</td></tr>
<tr><td>(v)</td><td>Analysing and compiling statistics for business purposes;</td></tr>
<tr><td>(vi)</td><td>Advertising and marketing, including targeted marketing and electronic direct marketing, but only to the extent permitted by the applicable law;</td></tr>
<tr><td>(vii)</td><td>The execution of administrative payments and costs;</td></tr>
<tr><td>(viii)</td><td>The prevention and investigation of malpractices, which can be conducted for example through camera and other technical monitoring.</td></tr>
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## 4 CATEGORIES OF PERSONAL DATA PROCESSED BY SCALA

Scala may process the following personal data directly necessary for the execution of the aforementioned business purposes. These personal data can be categorised as follows:

Basic information, such as

- Name
- Contact information (such as address, telephone number and email)
- Preferred language where appropriate
- Information concerning the data subject's employer, title and position or assigned tasks within the entity represented by the data subject

Information related to the business relation or other relevant connection between the data subject and Scala, such as

- Information related to the relevant contract and the data subject's association to the contract
- Invoicing and payment details
- Details on communications and other interaction between the data subject and Scala, such as information on sales meetings, sales or sales project related or other events to which the data subject has participated, phone calls and other conversations including emails as well as information concerning executed marketing acts
- Possible permissions and prohibitions concerning direct marketing

Furthermore, Scala may process change data of the abovementioned data categories.

## 5 REGULAR SOURCES OF PERSONAL DATA

Personal data of Scala's clients' representatives and contact persons are collected from the data subject himself/herself or from an organization represented by a data subject, for instance in the context of entering into a contract, or in connection to invoicing. When the contractual relation continues, personal data is collected from the data subject himself/herself also by other means, for instance in various customer service occasions via telephone or email.

In addition, Scala conducts active canvassing on an ongoing basis, and may collect personal data relating to data subjects from public websites or other publicly available sources, to the extent permitted by applicable legislation.

Personal data may also be collected and updated from companies belonging to the same group of companies and economic interest group with Scala as well as from authorities and companies providing services related to personal data, such as Suomen Asiakastieto.

## 6 TRANSFERS AND DISCLOSURES OF PERSONAL DATA

Scala may transfer or disclose personal data to third parties in the following manner in order to fulfil the processing purposes described in this Privacy Policy.

Scala may transfer personal data to an entity which processes personal data on behalf of Scala (i.e. a processor) in order for the processors to perform services and tasks assigned to them. Data processors' tasks relate, for instance, to provision and maintaining of devices, data systems and software, as well as provision of other data processing services. When personal data are transferred to processors, Scala has through contractual arrangements ensured that personal data is processed only for the purposes described in this Privacy Policy.

Some of the data processors used by Scala are located or use resources outside the EU or EEA area. Scala has contractually ensured that these entities undertake to apply an appropriate level of data protection in their processing practices, and thus the data transfers are subject to appropriate safeguards. More information on cross border transfers of the personal data and on the appropriate safeguards applied thereto from time to time is available from the contact person mentioned under Section 2 of this Privacy Policy.

Due to the nature of Scala's business activities, Scala may, where specifically requested by Scala's business partner, disclose pieces of basic information of representatives or contact persons of prospects to the business partner to the extent necessary in order to facilitate creating connection and communications between the two.

Scala may disclose personal data to competent authorities having legal access to the information from time to time in accordance with applicable legislation.

In case of the sale of Scala's business, or a part of it, or in case Scala conducts other organizational changes to its business, Scala may disclose personal data to the buyers and their advisors in accordance with the then current legislation.

## 7 DATA RETENTION PERIOD

The retention period of personal data depends on the personal data concerned and its processing purpose. Scala retains personal data at least as long as they are needed for the execution of the informed purposes of processing, such as in the performance of Scala's contractual obligations or the managing the business relations between Scala and the data subject or the entity represented by the data subject.

The retention periods are determined in accordance with the following criteria:

− Related personal data will be retained for as long as the legitimate interest of Scala can reasonably be considered valid. The validity of the legitimate interest is determined by, for example, the communications between Scala and the data subject.

− Ultimately, the retention period of personal data of Scala's business partners' representatives is tied to the term of a contract with the data subject or an organization represented by the data subject.

− Statutory retention periods may also apply. For instance, the Finnish accounting regulation requires that the information included in the accounting materials are retained for six years.

− Related personal data will be deleted when the data subject withdraws his/her consent, requests deletion of his/her personal data or objects to the processing of his/her personal data for e.g. direct marketing purposes. In these cases, however, Scala may

keep the information regarding the data subject's objection to receiving direct marketing.

When personal data are no longer needed, the personal data is destroyed in a secure way or irrevocably anonymized.

## 8 RIGHTS OF THE DATA SUBJECT

The GDPR provides the data subject with several rights based on which the data subject can in many situation himself/herself decide on the processing of his/her personal data. The data subject may use the following rights with regard to Scala to the extent Scala acts as the controller to the personal data of the data subject in question. The extent of the rights of the data subject are subject to the legal basis for processing. The exercising of the rights requires identification.

– Right of access: The data subject has the right to obtain confirmation from the controller on whether the controller processes personal data concerning the data subject and the right to access such data. The controller may ask the data subject to specify his/her access request, amongst others, with regard to the details of the data to be delivered.

– Right to rectification: The data subject has the right to obtain from the controller the rectification of inaccurate personal data concerning him/her processed by the controller, or to have incomplete personal data processed by the controller to be completed.

– Right to be forgotten: The data subject has the right to obtain from controller the erasure of personal data related to him/her, and the controller has the obligation to erase such personal data in case there is no longer a valid legal basis for the processing of such data or, where the legal or contractual obligation binding the controller related to the storing of the personal data has ended or, where the data subject has withdrawn his/her consent to the processing of his/her personal data.

– Restriction of processing: In certain cases, where so prescribed by law, the data subject may have the right to obtain from the controller restriction of processing of his/her personal data.

– Right to data portability: The data subject may, subject to certain conditions prescribed by law, have the right to receive the personal data concerning him/her processed by the controller in a commonly used and machine-readable format, and the right to transmit those data to another controller without hindrance from the original controller.

– Right to object to processing: In certain cases, the data subject may have the right to object to processing of personal data concerning him or her. The right to object is applicable in such situations in particular where the processing of personal data is based on the controller's legitimate interest. In such situations the controller is obliged to comply with the data subject's request, unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or where the personal data are needed for the establishment, exercise or defence of legal claims.

– To the extent the processing of personal data is based on the data subject's unambiguous consent, the data subject has, at any time, the right to withdraw his/her consent.

The requests regarding the exercising of the rights shall be directed to the contact person mentioned in section 2 of this Privacy Notice.

In addition, the data subject has the right to lodge a complaint with the supervisory authority where the data subject deems that Scala has not complied with the applicable legislation in the processing of his/her personal data. The complaint shall be made to the competent supervisory

authority, in Finland to the Data Protection Ombudsman, in accordance with his instructions. The website of the Data Protection Ombudsman can be found here.

**9 FINAL WORDS**

Scala may, from time to time, change this Privacy Policy. You can tell when changes have been made to the Privacy Policy by referring to the "Last Updated" legend at the top of this document. Scala encourages you to review this document regularly for any changes. If Scala materially changes the ways in which Scala processes personal data, Scala will post a notice on this webpage.