

MM Kotkamills Oy

## **PRIVACY POLICY**

Protecting the privacy of employees is important to us. MM Kotkamills Oy and its subsidiaries (“MM Kotkamills”) undertake to protect your privacy and to comply with legislation on the processing of personal data and data protection. MM Kotkamills processes the employee data it collects in accordance with the principles described in this Privacy Policy.

If you have any questions about the processing of your personal data, you can always contact Kotkamills using the contact details below. You will also find information on how you can exercise your rights regarding the processing of your personal data.

### 1 CONTROLLER’S CONTACT DETAILS

MM Kotkamills Oy and each subsidiary with regard to its own employees (hereafter “we” or “MM Kotkamills”) act as the controller of the personal data processed.

Our contact details for matters involving the processing of personal data related to employees:

*Director Human Resources, Susanna Gunnar  
susanna.gunnar@mm.group*

### 2 HOW WE USE YOUR PERSONAL DATA

The purpose of processing your personal data is to manage the employment relationship, manage MM Kotkamills’ statutory employer obligations and other legal obligations, and develop personnel.

The processing of your personal data is based on either (i) the fulfilment of a contract of employment, (ii) a legitimate interest of MM Kotkamills based on a relevant link between the company and the data subject when working for MM Kotkamills (for example, the management of employment benefits with the relevant service providers in order to provide services in the interests of employees and the monitoring of skills and development in order to manage employment relationships), (iii) performance of MM Kotkamills’ statutory obligations, or (iv) the separate consent of the data subject.

### 3 WHAT DATA WE COLLECT ABOUT YOU

The personal data collected in the register is mainly information you provide directly to MM Kotkamills. Data can also be collected during your employment and from MM Kotkamills’ own operations. If data is

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collected from sources other than the employee him/herself, we always request the employee's consent.

Only such personal data as is necessary for the purposes described above are entered in the employee register. The processing of employee contact information and employment information is a prerequisite for fulfilling statutory obligations and managing the employment relationship. Without that information, MM Kotkamills cannot meet its obligations in relation to your employment.

MM Kotkamills processes the following data:

- Identification and address information (including name, ID number and address)
- Employment and training information
- Information related to payroll and personnel management
- Information related to working time management and monitoring as well as access control
- Information related to annual leave
- Information related to work equipment and business travel
- Health information (including information on the pre-recruitment medical examination)
- Other information necessary for the fulfilment of the employment relationship or the employer's obligations

MM Kotkamills keeps data about the health of employees separate from other data.

#### 4

### WHO WE SHARE YOUR DATA WITH

The data will only be disclosed with your consent or within the Group on the grounds required by data protection legislation, or to authorities (such as tax authorities) and occupational health care partners, when disclosure is specifically provided for.

MM Kotkamills may also transfer your personal data to subcontractors and service providers commissioned by MM Kotkamills to process personal data.

#### 5

### WHERE YOUR DATA IS PROCESSED

Personal data is processed within the EU and the European Economic Area. If we also use service providers located outside the EU and the European Economic Area, we will ensure an adequate level of protection of your personal data as required by data protection legislation.

## 6 HOW LONG WE RETAIN YOUR DATA

We will only retain your personal data for as long as is necessary for the purpose of the processing. Employee data is, in principle, retained for the duration of the employment relationship. Individual data will also be kept longer than this, but only for as long as is necessary for the specified purposes of processing, for example to fulfil MM Kotkamills' employer or accounting obligations.

## 7 YOUR RIGHTS

Your rights regarding the processing of your personal data are described below. You can request to exercise your rights, preferably by sending an e-mail to the controller using the request form.

*Right to verify your personal data.* You have the right to verify the personal data we hold about you.

*Right to withdraw consent.* When the processing of your personal data is based on consent (and not, for example, on the fulfilment of the employment contract or our legitimate interest), you have the right to withdraw your consent at any time.

*Right to correct your personal data.* You can ask us to correct any incorrect or incomplete data about you.

*Right to object to the processing of your personal data.* You have the right, on the basis of your specific personal situation, to object to the processing of personal data based on our legitimate interests. We evaluate such objections on a case-by-case basis. Please note that we may have the right to process personal data for a valid reason, despite your objections.

*Right to restrict processing.* In certain situations, you have the right to ask us to restrict the processing of your personal data, in which case we may only process your personal data with your consent, or for certain limited uses. You have the right to request a restriction on processing if the data we process is incorrect, processed unlawfully or unnecessarily, or if you have objected to the processing of your personal data.

*Right to transfer personal data to another controller.* When the processing of your personal data is based on an agreement between us or on your consent, you have the right to request us to transfer the personal data you provided to us to another controller. This right only applies to personal data that you provided and that is processed by automatic data processing.

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*Right to delete data.* You have the right to ask us to delete data about you. We will process the deletion request, after which we will either delete the data or state a valid reason why the data cannot be deleted. Please note that we may have a statutory or other right not to delete the data you have requested.

Please contact us if you have any questions regarding the processing of your personal data or the exercise of your rights. We strive to resolve all issues related to the processing of your personal data with you personally. However, you can always file a complaint with the Data Protection Ombudsman if you feel that we are in breach of applicable data protection laws when processing personal data. Contact details of the Data Protection Ombudsman:  
[www.tietosuoja.fi/fi/index/yhteystiedot.html](http://www.tietosuoja.fi/fi/index/yhteystiedot.html)