

Privacy Policy – updated 22 December 2021

LapWall Oy's customer, supplier and partner registers

LapWall Oy designs, manufactures and supplies wood elements for construction companies and developers. To serve our customers and deliver our products, we collect necessary personal data from the contact persons of our customers, suppliers and partners. In this Privacy Policy, we explain what data we collect, how we use and protect it, and the data subject's possibilities to influence the processing of their personal data. This Privacy Policy applies to the processing of personal data in LapWall Oy's customer, supplier and partner registers.

Controller of the Register:

LapWall Oy

Periojantie 3

FI-92930 PYHÄNTÄ, Finland

Business ID FI24229563

Contact person in data protection matters:

Jukka-Pekka Salo

Lentokatu 2, FI-90460 Oulunsalo, Finland

Telephone: +358 50 383 9522

E-mail: tietosuoja@lapwall.fi

1. Registered and processed personal data

Our customer registers contain information on contact persons and representatives of our customers or potential customers. Our supplier and partner registers contain information about the contact persons of our suppliers and partners.

The data collected in the registers consists of the contact information provided by the contact person themselves or their employer, such as name, e-mail address, telephone number, employer, and occupation. We may also store information on consent or prohibition regarding direct marketing. We do not collect sensitive information.

We do not collect personal data from publicly available sources and do not use automated methods to collect personal data.

2. The purpose and legal basis for processing personal data

Personal data is processed for the management and administration of customer, supplier, and partner relationships, communication, processing orders and offers, and delivering products and services.

The primary basis for the processing of personal data is LapWall Oy's customer relationship or possible customer relationship or other contractual relationship with the company where the data subject is employed, and our legitimate interest in managing the customer and

cooperation relationship. Personal data may also be processed based on consent from the data subject.

3. Recipients and processors of personal data

Personal data is processed by LapWall Oy's employees whose tasks are related to marketing, sales, installation, or administration. Our personnel is trained in secure data processing and each personnel group processes data only to the extent necessary for the performance of their duties.

We also use trusted service providers to process personal data to whom personal data may be transferred. Such service providers include the providers of the information systems and cloud services we use. We do not allow service providers to use personal data for any purpose other than providing the service. Agreements with all of our service providers consider the requirements set by the EU's General Data Protection Regulation (GDPR) and other legislation.

4. Transferring personal data outside the EU or EEA

Personal data is not transferred outside the EU or EEA

5. Profiling and automated decision-making

Personal data is not used for automated decision-making or profiling.

6. Disclosures and transfers of personal data

Personal data is not regularly disclosed to third parties. In any possible disclosure of personal data, we comply with the applicable data protection legislation.

If, for strategic or other business reasons, we decide to sell or transfer all or part of our business, we may, as part of such sale or transfer, transfer data we collect and store, including customer data containing personal data, to anyone involved in the sale or transfer of business.

Furthermore, we may disclose personal data if we deem it necessary due to applicable law, regulation, or an official request.

7. Cybersecurity

Personal data is stored in electronic registers, where appropriate measures have been taken to protect personal data. Personal data is protected against unauthorized access and accidental or unlawful destruction, alteration, disclosure, transfer, or other unlawful processing. The use of registers, and modification and processing of data requires user identification and a secure connection. Use of the registers is permitted only to designated persons whose duties include the administration and management of the system or customer relationships.

8. Retention period of personal data

We will only retain the personal data we collect for as long as it may be deemed necessary for the purposes described in this Privacy Policy unless the retention of the data for a longer period is required or permitted by law. We erase personal data stored in the register when the data subject's employment ends, or duties otherwise change so that there are no longer grounds for processing personal data.

9. Rights of the data subject

The data subject has the rights described below under data protection legislation, the application of which in each case depends on the purpose and situation of the processing of personal data. The data subject may exercise their rights by submitting a written request to the contact person indicated in this Privacy Policy. To ensure the reliable identification of the data subject, we may, in certain circumstances, require that requests to exercise rights must be submitted in person at our office or by a personally signed letter containing the appropriate identification information. We will respond to requests in writing and always endeavor to resolve any questions concerning the processing of personal data directly with the data subject, respecting all the rights of the data subject.

Right to access personal data

The data subject has the right to obtain confirmation as to whether or not personal data concerning them are being processed, and to have access to the data and to be informed about the processing of personal data. In addition, the data subject has the right to receive a copy of the personal data.

Right to rectify personal data

The data subject has the right to request rectification of inaccurate or incomplete data relating to them.

Right to erase personal data

The data subject has the right to request the erasure of their personal data. The controller will erase the personal data of the data subject if it is no longer needed for the purposes for which it was collected or otherwise processed, or if there is another requirement for erasure imposed by data protection legislation.

Right to restrict processing

The data subject has the right to require the controller to restrict the processing of their personal data, for example, if the data subject is waiting for the controller to respond to a request for rectification of their data.

Right to withdraw a consent

If the processing of personal data is based on the data subject's consent, the data subject has the right to withdraw their consent at any time by notifying the controller. The withdrawal of consent shall not affect the lawfulness of the processing carried out based on consent prior to its withdrawal.

Right to object to processing

Based on special personal circumstances, the data subject has the right to object to the processing of their personal data based on legitimate interest. The controller may refuse to comply with a request for restriction on grounds laid down by law. However, the data subject always has the right to object to the processing of their personal data for direct marketing purposes and profiling.

Right to transfer personal data from one system to another

Insofar as the data subject has provided the controller with personal data which is processed based on the data subject's consent or for the performance of a contract, the data subject has, under certain conditions, the right to receive the data in a machine-readable format and to transfer it to another controller.

Right to appeal to the supervisory authority

The data subject has the right to lodge a complaint with the competent supervisory authority if the data subject considers that the processing of their personal data has been in breach of data protection legislation.

Possible changes to data protection policies

We may amend and update this Privacy Policy as services and businesses develop and/or legal obligations change. If the changes are significant, we will notify of them on our website or by other means, such as email. The date of the last change is shown in the header of the policy.

10. Cookies

Our website uses cookies to track visitor traffic on the site. Cookies are small text files that the site sends to the user's computer when visiting the site. The information collected with cookies includes, for example, the user's browser software, screen resolution, the device's operating system and the time spent on the site.

Cookie information can be used to track and analyze website visitor numbers and to develop the site to better serve visitors.

Cookie management

Most Internet browsers accept cookies by default. However, by changing the browser settings, the user can prevent the browser from storing cookies or restrict their use. Previously installed cookies can also be removed by adjusting the browser settings. However, for some features of the site, the blocking of cookies may affect the functionality of the site.

Google Analytics

The site uses Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google Analytics uses a set of cookies to collect data, create statistics related to usage, monitor the site, and improve its performance (performance cookie). All information obtained through these cookies is collected and aggregated anonymously and does not identify the user as a person.

Third-party cookies

During a visit to the website, the user may also receive cookies on their computer sent by third parties from other websites or web servers containing embedded content on the website. These cookies can be used to interact with, for example, social networking sites or other external platform services. Even if the user does not use the service in question, it is possible that information about the visit is collected on the site. The website administrator cannot technically control the installation of cookies and other tracking systems used by third parties, and we do not monitor the use of these cookies.