



PRIVACY POLICY FOR THE UNITED BANKERS GROUP COMPANY'S MARKETING REGISTER

1 Data Controller

The data controller is the United Bankers group company to which a person (hereinafter, the "data subject") has given consent to the collection and processing of their personal data for the purposes of the marketing register or whose legitimate interests require the processing of the data subject's personal data, for instance because the data subject is in a client relationship with the relevant data controller company.

United Bankers group companies that process personal data for the purposes of the marketing register, include the following:

- UB Asset Management Ltd
- UB Asset Management Tampere Ltd
- UB Securities Ltd
- UB Fund Management Company Ltd
- UB Corporate Finance Ltd
- UB Nordic Forest Management Ltd
- UB Brokerage Company Ltd
- UB Life Ltd
- UB Finance Ltd
- UB Meklarit Oy

Each of which is individually a data controller.

2 Data Controller's Contact Person

Data security matters are managed on behalf of the data controller by the parent company of the United Bankers group, United Bankers Plc.

The contact person in matters concerning the register is:

Sofia Stenius-Linna, Head of Compliance

United Bankers Plc

Aleksanterinkatu 21 A,

00100 Helsinki, Finland

compliance@unitedbankers.fi

Tel. 09 2538 0357

3 Data Protection Officer's Contact Details

Sofia Stenius-Linna
Head of Compliance
compliance@unitedbankers.fi
Tel. 09 2538 0357

4 Name of Register

The United Bankers Group Company's Marketing Register

5 Purpose of Data Processing

The data controller processes personal data for the purposes of sales promotion and carrying out of marketing communications and marketing information, including for the purposes of direct marketing and electronic direct marketing. Electronic direct marketing is only sent to persons who have given their prior consent. The data subject has the right to prohibit direct marketing directed at them.

Furthermore, the data controller processes personal data for the planning, implementation and development of marketing. In addition, personal data is processed in conjunction with organising client events.

6 Legal Basis for the Processing of Personal Data

Personal data are processed on the following legal bases:

- (a) processing is based upon the unequivocal consent of the data subject (retractable by the data subject at any time)
- (b) processing is necessary for the purposes of the legitimate interests pursued by the data controller. Such purposes of processing may include, for instance, actions related to direct marketing or when there is a need to transfer personal data within the corporate group for administrative reasons.

7 Data Content of the Register (Categories of Personal Data to be Processed)

The data controller collects personal data pertaining to the data subject that is necessary from the point of view of the purposes of use described under Clause 5 of this privacy policy.

This register contains personal data of the following data subjects:

- Clients of the data controller with which the data controller has an existing client relationship;
- Potential clients of the data controller (prospects) who have expressed their interest towards the data controller's services and granted their consent to the processing of personal data;
- Potential clients of the data controller (prospects), whose information the data controller is processing on the basis of a legitimate interest

The register contains, *inter alia*, the following personal data concerning the data subjects:

- Basic personal details of the data subject: name, contact details, domicile and preferred language for communications
- Objects of interest of the data subject
- Registration information in connection to organised events
- Direct marketing consents and prohibitions

8 Regular data sources

Personal data is collected from the data subjects themselves. Furthermore, contact information may be collected, saved, or updated from publicly available sources, such as, for instance, authority registers or other data controllers providing address, updating or other similar services.

In addition to the above, personal data may be collected from sources to which the data subject has given consent to disclose the data to the data controller, such sources are for instance distributors of the products and services of the United Bankers Group.

Information is gathered from the data subject for instance when the data subject orders the data controller's newsletter or company news on the data controller's website, or sends a contact request to the data controller for instance by using the contact form on the website.

9 Personal Data Retention Periods

Data controller applies the following retention period principles:

Personal data concerning the data subject are retained for as long as necessary for direct marketing, communications and provision of information. The need for the retention of information is evaluated at regular intervals. The personal data of prospects shall be erased if the data subject prohibits the targeting of direct marketing at them.

When personal data is processed based on the consent of the data subject the personal data are retained for as long as necessary for carrying out of the data subject's request, or until such request is cancelled.

When personal data is processed based on the legitimate interests of the data controller, for instance for direct marketing purposes, the personal data are retained until the data subject opts out of direct marketing or the data controller determines that such data retention is no longer expedient.

If the data subject is a client of the data controller, the information relating to the client relationship shall be retained in accordance with the privacy policy of the client register.

10 Recipients of Personal Data (Categories of Recipients) and Regular Disclosures of Personal Data

In the technical, commercial or operative implementation of the personal data processing tasks, the data controller retains contractual partners acting on behalf of the data controller, *i.e.* personal data processors, co-operation with which entails the transferring of personal data for processing in accordance with the service agreement and the data protection provisions of same.

11 Transfers of Personal Data Outside of the EU or EEA

As a main rule, the data controller shall not transfer information outside of the EU or EEA (to a "third country"). In case personal data is exceptionally transferred to a third country, this is only done if we are able to ascertain that the data subject's information has been protected at the level required by the General Data Protection Regulation, or if the data subject grants their express consent to same.

12 Principles of Personal Data Protection

Information concerning the data subjects has been protected as follows:

The data controller has agreed upon the protection of the register with the system suppliers.

The right to access the databases and systems and to utilise the register has only been granted to employees of the data controller or of the subcontractors acting on its behalf and on its account who by virtue of their assignment are entitled to process the information contained in the register. Only employees who by virtue of their work tasks have the right to process personal data are entitled to use the system containing personal data.

Access to the information contained in the register is only allowed to designated persons authorised to do so owing to their work tasks. The confidentiality, integrity and availability of the personal data contained in the register is protected with appropriate technical and organisational measures. Such measures include, *inter alia*, passwords and other access right management, access control and physical safeguards as well as firewalls.

13 Rights of the Data Subject

The data subject shall have the following rights defined under the EU General Data Protection Regulation:

- a) The right to obtain confirmation from the data controller of whether personal data concerning the data subject are being processed or not, and if such personal data are being processed, the right to gain access to the personal data and to certain data determined under the EU General Data Protection Regulation.
- b) The right to object to the processing of personal data for certain purposes defined under the EU General Data Protection Regulation, such as for direct marketing.
- c) The right to withdraw their consent at any time without this impacting the lawfulness of the processing conducted on the basis of such consent prior to the withdrawal of same.
- d) The right to require the data controller to rectify without any undue delay any inaccurate or erroneous personal data concerning the data subject, as well as the right to have incomplete personal data supplemented.
- e) The right to require the data controller to erase the personal data concerning the data subject without any undue delay in situations defined under the EU General Data Protection Regulation.
- f) The right to require the data controller to restrict processing under the situations defined under the EU General Data Protection Regulation.
- g) The right to obtain, under certain situations defined under the EU General Data Protection Regulation, the personal data concerning the data subject that the data subject has provided to the data controller, in a structured, generally used and machine-readable form, as well as the right to transfer such data to another data controller without hindrance from the data controller to which the personal data were originally provided.
- h) The right to lodge a complaint with the supervisory authority, if the data subject considers that the processing of their personal data occurs in violation of the EU General Data Protection Regulation. The data subject may lodge a complaint especially in the member state of their permanent place of residence or employment, or in which the alleged breach of the General Data Protection Regulation has occurred.

Requests regarding the exercise of the data subject's rights shall be addressed to the data controller's contact person mentioned under Clause 2.

14 Cookies

The United Bankers Group utilises the so-called cookie functionality on its website. A cookie is a small text file sent to the user's computer and stored there, helping the host of a website to identify visitors visiting the website frequently, facilitating the logging-in of the visitors to the website and enabling the compilation of aggregate data of the visitors. Cookies do not harm the users' computers or their files. More information about cookies on the unitedbankers.fi -website »

In case a user visiting the website of the United Bankers Group does not want United Bankers Group to obtain the aforementioned information with the aid of cookies, the user may deactivate the cookie functionality. The service user should note that some cookies may be necessary for the proper functioning of the website maintained by the United Bankers Group and the services provided by same.

15 Amendments

The data controller may make amendments to this privacy policy by announcing the amendments on the website.