



KSOY – Privacy policy for the customer and marketing register

Updated 21 February 2022

This privacy policy explains how we at Kymenlaakson Sähkö collect and process personal data about our customers and potential customers, e.g. in relation to the management of customer relations and marketing.

1. Controllers

Kymenlaakson Sähkö Oy - Kymmenedalens El Ab (business ID 0128951-2) and
Kymenlaakson Sähköverkko Oy (business ID 2058585-1)

In their capacity as controller, both of the group companies of the Kymenlaakson Sähkö Group maintain their own register in terms of the following entities and are responsible for the processing in their own activities for purposes and according to the legal bases referred to in this privacy policy.

2. Contact details in data protection issues

Kymenlaakson Sähkö Oy / Data protection issues

Yhdystie 7, 47201 Elimäki

Tel. +358 5 778 0500

Contact details of the data protection officer of the Kymenlaakson Sähkö Group.

Tel. +358 5 778 0500

Email tietosuoja@ksoy.fi

3. For what purpose and on which grounds do we process your personal data?

We process personal data for the following purposes:

- the provision, production and development of products and services
- billing, monitoring and collection of payments by Sergel Oy
- management, maintenance and development of customer relationships
- customer communications, including feedback and customer satisfaction surveys and fault notices
- development and planning of business operations, services and the related customer service
- marketing and distance selling of products and services direct marketing and online marketing by letter, telephone and by electronic means, and their targeting
- implementation of opinion polls and marketing studies, organisation of marketing competitions and prize draws
- observation, prevention and investigation of irregularities, fraud and other crime
- analysis, segmentation and statistical compiling for the above-mentioned purposes.

The processing of personal data is based on customer agreement, the legitimate interest of Kymenlaakson Sähkö (such as direct marketing, debt collection), statutory obligation, or your consent.

4. What kind of personal data do we process and where do we collect the data from?



We process the following personal data of customers and potential customers (incl. subscribers to the newsletter, people who have requested a quote or asked us to contact them, participants to events, visitors to our website, people who have registered in our online service), which, at the most, are:

Customer's basic data

- name and contact details, such as telephone number, email address, postal address
- identification data: If necessary, personal identity code, e.g. for contract and billing purposes, details related to registration and login in the online service

Data related to the customer account

- customer number and history (e.g. contract and collateral data, customer satisfaction surveys/feedback and complaints)
- contact information (e.g. electronic forms, chat messages, telephone recordings)
- billing, payment and debt collection data and data related to credit standing
- consents and prohibitions concerning direct marketing
- marketing measures, their use and the data provided in connection with them, e.g. subscribing to a newsletter
- data concerning the use of the website and electronic services, such as browsing and search data, usernames and passwords, cookies, IP addresses
- any other information provided by the data subject

Metering point data

- data concerning connections and metering points, such as connection number and metering point number
- contract, electricity consumption estimate and information on actual consumption
- mode of living, main fuse size, metering type

We process the following personal data on the decision-makers and contact persons of customer companies and associations (incl. subscribers to the newsletter, people who have requested a quote or asked us to contact them, participants to events):

- name, job title, company/association, postal address, email address, telephone number
- customer history (e.g. participation in events and functions, contacts to us)
- direct marketing consents and prohibitions.

Information concerning customers is obtained from the customers, e.g. in connection with requests for quotes, orders, contracts and other contacts, and from the information that is stored or recorded with regard to the customer's use of the services or products. Information about potential customers is obtained, e.g. in connection with competitions and prize draws. Of this information, only the data concerning potential customers who have given their consent to sending them marketing messages and contacting them shall be recorded.

In addition, customer-related data is regularly obtained from energy companies operating in the electricity market and from the datahub for electricity market information exchange by virtue of the applicable law and information exchange based on official regulations. Data is also updated on the basis of the rules of electricity market information exchange.

All contacts by customers may be recorded. The recordings are used for verifying contacts, processing complaints and developing customer services.

Personal data can also be collected, recorded and updated from the register of the Digital and Population Data Services Agency and another operator offering address, updating and other



similar service. Data is also updated on the basis of the rules for exchanging electricity market data published by Finnish Energy.

5. Which organisations do we share data with? Do we transfer data outside the EU or the EEA?

Customer data can only be shared with the service providers of the Kymenlaakson Sähkö Group with whom we have agreed on the implementation of services pertaining to the Kymenlaakson Sähkö Group. The service providers are required to comply with the legislation and the data protection and confidentiality regulations complying with the industry guidelines.

In terms of the following services, we use service providers and/or the group companies of the Kymenlaakson Sähkö Group for the processing of personal data:

- customer service, maintenance of customer and metering data (incl. building, design and fault repair of the electricity network) and invoicing, telephone recordings
- maintenance of the online service
- marketing and sales
- maintenance of the dispatch lists of the newsletter and sending the newsletter
- implementation of customer satisfaction surveys
- maintenance and processing of the data of participants taking part in events

Each service provider processes the personal data in accordance with the data protection agreement only as far as is necessary in order to provide the service in question.

In addition, we can share your personal data if you have given us your consent to it. We can also share necessary personal data with a third party if obliged or required by a request you have made or a contract we have drawn up with you. We share, for example, your address with the postal or installation service in order to deliver a product or service you have ordered.

Customer data is shared with electricity market parties and the datahub for electricity market information exchange to the extent permitted and required by the electricity market legislation and other legislation.

As required by effective legislation, information can be shared with the authorities or other recipients specified by law, such as debt collection agencies for the recovery of bills, and in connection with legal proceedings or processes with the authorities.

As a rule, data is not transferred outside the EU or the European Economic Area. Data is transferred only to countries outside the EEA with respect of which the European Commission has issued a decision on an adequate level of protection for personal data.

6. How do we protect data and for how long do we store it?

The information in the customer register is gathered into databases that are protected with firewalls and passwords and by other technical means. The server equipment is located in locked premises, which can be accessed only by the employees of the company or the service providers. We carry out data protection and information security, for example, by means of predictive risk management, by taking account of data protection and information security in the planning of our services, by training our employees and by making regular inspections of the conformance of our services. We take care of risks related to the misuse of data and other similar risks, taking into account the likelihood of risk and the nature of the data to be protected. Access to data is granted only to persons employed by the Kymenlaakson Sähkö Group or to actors authorised by it and who require the data in their duties. The Kymenlaakson Sähkö Group requires that its employees and partners are committed to keeping the customer data confidential. Material kept in manual format is stored in facilities, which are used by the Kymenlaakson Sähkö Group and kept locked and monitored against unauthorised access.



We store personal data for as long as it is necessary on the basis of the customer relationship or until the data subject requests the data to be erased. However, in such a case, data concerning the person in question where legislation (such as accounting or energy legislation) or the contractual relationship so require, as well as data concerning the erasure of data will be stored in the register. We take care of such reasonable measures that ensure that we do not store in the register any personal data concerning data subjects that is incompatible, out of date or incorrect in view of the purposes of data processing. Based on legislation concerning the energy sector, Kymenlaakson Sähkö is obliged to collect and store your personal data (e.g. data concerning the contract, customer relationship and transactions) for the duration of the customer relationship and for 10 years after the customer relationship has been terminated.

7. Your rights as a data subject with regard to the processing of data

Requests concerning the rights of data subjects must be submitted to the address given in section 2. As a data subject, you have the following rights:

The right to review and the right to demand rectification and erasure of data.

- You have the right to obtain information about the processing of personal data, the right to review your personal data that has been entered in a personal data register and the right to demand rectification of incorrect data and the erasure of data. After registering in the online service, you can review your data directly via the service (<https://online.ksoy.fi/login>).

The right to withdraw consent

- You have at any time the right to withdraw your consent concerning the processing of personal data you have provided. The withdrawal of consent does not affect the lawfulness of data processing carried out before the withdrawal.

The right to prohibit direct marketing

- You have the right to prohibit the processing of your data for market and opinion survey purposes. In addition, you can prohibit direct marketing at any time or withdraw your consent to electronic direct marketing by sending the notice of withdrawal to the address referred to in section 2 or by using the link in the direct marketing message for issuing your withdrawal.

The right to object and the right to restrict processing and data sharing

- You have the right to object or request to restrict the processing and sharing of your data.

The right to lodge a complaint with a supervisory authority

- You have the right to complain to the competent supervisory authority if you think that the EU General Data Protection Regulation has not been complied with in the processing of your personal data.

Requests concerning the rights of data subjects are to be sent to the address given in section 2.

8. Amendments to the privacy policy

We constantly develop our operations and data protection tools and reserve the right to amend the privacy policy. When required by law, we will notify of updates and amendments that have an impact on you.