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# **CO2 Roadmap Privacy Notice**

This privacy notice applies to the processing of personal data in relation to the CO2 Roadmap service provided by Sitowise Oy. The notice complies with the EU General Data Protection Regulation, Finnish legislation, and other applicable regulatory data protection requirements.

Definitions used in this privacy notice:

- **Sitowise Oy** is also referred to as "Sitowise" or "us".
- **Personal data** refers to any information related to an identifiable individual. This does not include anonymized data where identifiers have been removed.
- **Service** refers to the CO2 Roadmap service provided by Sitowise.
- **User** refers to a user of the CO2 Roadmap service.

### 1 What information is collected and processed?

Sitowise may collect and process the following types of information:

User's basic information, such as the user's first name, last name, email address, user account details, and preferred method of contact. Personal identification numbers may be processed, if necessary, for example, in connection with billing or within the limits allowed or required by law.

Information related to the contractual relationship, such as information concerning the Service and its implementation, user details, billing, and payment information.

Information related to the use of the service, such as visitor and cookie information generated during the use of the service.

We do not process special categories of personal data.

### 2 How is the collected information used?

Data may be collected, processed, and used on the following grounds:

- To fulfill or achieve the requirements of a contract and to provide the service.
- Based on applicable laws or regulations.
- In rare cases where we need to use data based on a legal obligation or to protect individual or public interests.
- Based on consent.

Personal data is collected for the purpose of user identification and contract fulfillment. Through identification, we can personalize the service for each user.

Data is processed to deliver the CO2 Roadmap service, and service-related communication and bookings. The collection of data required by law or contract may be a condition for the fulfillment or creation of a contract. Failure to collect such data may result in the interruption of service provision.



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Data generated during the use of the services can be used for service development. User information can also be used to compile statistics, which help measure the activity of service usage, for example.

Consent can be used as a basis to enable, for example, newsletters and other communications. Consent can be withdrawn by contacting us at the following address: <a href="mailto:support@co2roadmap.com">support@co2roadmap.com</a>.

## 3 How is the information collected and processed?

Data is collected, processed, and used only within the limits permitted by law.

The collected personal data primarily comes from the data subject themselves. When a user visits the Service, anonymous visitor information may be recorded.

Sitowise does not use automated decision-making in the processing of personal data.

#### 4 Who has access to the information?

The collected personal data is primarily only accessible to Sitowise and the User. Personal data is not shared with third parties.

Information is primarily processed within Finland. Information is not processed outside the EU/EEA unless individual users contact the service from outside the area.

### 5 Data retention

Personal data is retained for two years from the User's last login, after which it is deleted or anonymized. If none of the users belonging to a specific organization have updated their own or the organization's information for two years, Sitowise has the right to delete or anonymize all data relating to that organization and its users. The retention period of the data is based on the review cycle of organizational climate themes, which necessitates keeping the information for a duration that allows even less active organizations to perform actions related to climate themes at their own pace.

In a situation where an agreement to use the Service has been concluded, but the User has not logged in to the Service once, the personal data provided when the agreement was concluded will be stored for one year after the end of the subscription.

Personal data is retained only for as long as the original purposes of collection require. This also includes retention periods set by law and regulations, such as accounting requirements.

In some cases, it may be necessary to retain the data beyond the aforementioned limitations. In such situations, the information will be anonymized in a way that the user is no longer identifiable.

## 6 The data subject's rights

The data subject has the right to request access to their personal data. The data subject also has other rights under data protection regulations, such as the right to rectification of data and the





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right to restrict processing in certain cases. The data subject may also request the erasure of their data if the processing of the data can no longer be justified.

The data subject can exercise their rights by contacting the data controller. If the data subject believes that their rights have been violated, they have the right to file a complaint with the supervisory authority.

#### Changes to the Privacy Notice 7

Sitowise reserves the right to make changes to this privacy notice. Any changes to the privacy notice will be communicated to the data subjects through the Service or by email. It is important for data subjects to carefully review the privacy notice after each update.

#### **Contact information** 8

Sitowise Oy

Linnoitustie 6 D, 02600 Espoo

Business ID 2335445-0, Location Espoo

Contact person: Jonas Aaltio jonas.aaltio@sitowise.com +358 44 427 9136

#### 9 Supervisory authority

If a data subject wishes to exercise their rights, they should primarily contact the data controller, Sitowise. The contact details of Sitowise can be found in section eight (8) of the privacy notice. The data controller must respond to the request within one calendar month.

If the request is denied without proper justification, or if the data subject believes that their rights have been violated, the data subject has the right to contact the supervisory authority.

#### Contact information of the supervisory authority:

Office of the Data Protection Ombudsman

Visiting address: Lintulahdenkuja 4, 00530 Helsinki

Postal address: PL 800, 00531 Helsinki Switchboard: +358 29 566 6700 Registry office: +358 29 566 6768

Email (Registry office): tietosuoja(at)om.fi

Electronic forms available at tietosuoja.fi/en

