

## DATA PROTECTION NOTICE

<b>Controller:</b>	Zenito Ltd (Zenito), 2573467-6 c/o Evli Plc, Aleksanterinkatu 19 PL 1081 00101 Helsinki p. (09) 476 690
<b>Contact Person in Register Matters:</b>	Zenito Ltd, Data Protection Officer: zenostock@zenito.fi
<b>Name of Register:</b>	Customer register
<b>Purpose of Processing Personal Data:</b>	<ul style="list-style-type: none"> <li>• opening customer relationships and making customer agreements</li> <li>• providing and managing services</li> <li>• customer communication</li> <li>• compliance with legal and regulatory obligations, such as identifying and verifying registrants, managing contact information, and risk management</li> </ul>
<b>Data subjects:</b>	<p>Individuals who have or have had with Zenito Ltd:</p> <ul style="list-style-type: none"> <li>a) a customer relationship or an application made for the establishment of such a relationship and,</li> <li>b) involvement, obligation, or other entitlement related to the customer relationship, such as possible beneficiaries or authorized persons and,</li> <li>c) other parties, such as potential customers, visitors, employees, and website users</li> </ul>
<b>Data content of Register:</b>	<p>The register includes the following information about the data subjects:</p> <p>Customers who have registered and use the service through Zenito Ltd's online service:</p> <ul style="list-style-type: none"> <li>• identification information (email address, password, contact persons, and their identification information)</li> <li>• order information and periods, as well as payment information</li> <li>• IP address</li> </ul> <p>Customers who have registered and use the service through a third party (such as <i>Danske Bank A/S</i>):</p> <ul style="list-style-type: none"> <li>• pseudonymized user ID</li> <li>• order information (Danske Bank A/S user)</li> <li>• IP address</li> </ul>
<b>Regular Data Sources:</b>	Information is obtained from the registered individuals themselves or their representatives. Information is generated in connection with the implementation of the services used by the customer. With the customer's consent, information may also be obtained from other sources.

<p><b>Regular Data Disclosures:</b></p>	<p>Zenito has the right to disclose personal data to the extent permitted by law, for the provision of services and products, and for compliance with contractual obligations. Zenito discloses information to authorities to fulfill their legal right to obtain information.</p> <p>Zenito may also disclose personal data to other third parties to the extent permitted by law for the provision of services and products and for compliance with contractual obligations. Such cases include, for example, identification solutions and the transfer of information between different parties, such as partners, recipients of account transfers, and auditors. Additionally, Zenito has made cooperation agreements with third-party service providers and suppliers, such as software development, maintenance, server, and IT support services.</p>
<p><b>Transfer of Data Outside the EU or EEA:</b></p>	<p>Information is not transferred outside the EU or EEA except in the cases listed below. Such a transfer occurs only if the personal data is protected in accordance with data protection legislation.</p> <ul style="list-style-type: none"> <li>• the European Commission has issued a decision on the adequacy of data protection in the country in question, or</li> <li>• using the European Commission's approved standard contractual clauses, or</li> <li>• ensuring that the entity processing the data has binding corporate rules or an approved certification in place, or</li> <li>• using another transfer mechanism permitted by law</li> </ul> <p>As a result of a risk assessment of the recipient country's legislation, additional protective measures may be combined with the transfer mechanisms to ensure an essentially equivalent level of protection for the transferred personal data.</p>
<p><b>Security of Processing of Personal Data:</b></p>	<p>Zenito has appropriate administrative, technical, and organizational security procedures in place. These procedures protect the information held by Zenito, for example, to prevent unauthorized use, destruction, and loss of information.</p> <p>Manual Material:</p> <ul style="list-style-type: none"> <li>• classified as confidential. All individuals processing the information are subject to statutory confidentiality obligations and/or confidentiality agreements</li> <li>• information is stored in locked premises</li> <li>• access control is arranged for all premises where information is processed</li> </ul> <p>Information Stored in Customer Information Systems:</p> <ul style="list-style-type: none"> <li>• classified as confidential. All individuals processing the information are subject to statutory confidentiality obligations and/or confidentiality agreements.</li> <li>• access to the register is restricted by user rights. Each data processor has its own user ID and password.</li> </ul>

	<ul style="list-style-type: none"> <li>• access to the database is restricted by maintenance rights. Each administrator has a separate user ID and password for maintenance tasks.</li> <li>• the systems using the register are maintained in a network isolated from the public network using firewall solutions.</li> <li>• encryption is used when transferring information in the public network unless the registered individual explicitly allows unencrypted transfer of information (e.g., the use of unencrypted email is allowed with the customer's explicit consent).</li> <li>• the register's information is regularly backed up and monitored</li> </ul>
<p><b>Legal Basis for Processing Personal Data:</b></p>	<p>The legal basis for processing personal data depends on the purposes for which the personal data is processed at Zenito. Additionally, Zenito processes customer data depending on the products or services the customer decides to use. The processing of personal data is based on a legal basis mentioned in the law, and here we describe the bases that Zenito follows when processing personal data. The actions listed below may fall under multiple legal bases on a case-by-case basis.</p> <p><b>Contract</b> Zenito collects personal data before preparing and making a contract. Zenito processes data to document and fulfill its contractual obligations to the customer and to offer certain products and services to the customer, as well as to implement the contract.</p> <p>Examples of processing activities where Zenito follows this legal basis:</p> <ul style="list-style-type: none"> <li>• actions against and monitoring of violations of terms of use, as well as addressing misuse</li> <li>• cooperation with third parties to fulfill contractual obligations</li> </ul> <p><b>Legitimate Interest</b> If necessary, Zenito may use legitimate interest if the customer's fundamental rights and freedoms are not in conflict with such interests.</p> <p>Examples of processing activities where Zenito follows this legal basis:</p> <ul style="list-style-type: none"> <li>• managing the customer relationship and customer communication</li> <li>• marketing activities, including targeting and planning direct marketing, including developing and testing processes and business operations</li> <li>• audits, such as accounting and internal audits</li> <li>• legal claims and their handling, such as debt collection or the process of drafting, presenting, or defending a legal claim</li> </ul> <p><b>Consent</b> Zenito requests separate consent from the customer for the processing of personal data in cases where electronic direct marketing is not based on legitimate interest. In these situations, the request includes the purpose of data processing, the type of personal data, and the right to withdraw consent. Consent can be withdrawn at any time after it has been given.</p>

	<p>Examples of processing activities where Zenito follows this legal basis:</p> <ul style="list-style-type: none"> <li>• cookies and similar technology</li> </ul> <p><b>Statutory Obligation</b> Various laws, regulations, and official decisions require compliance with certain procedures and therefore processing the personal data of our customers.</p> <p>Examples of processing activities where Zenito follows this legal basis:</p> <ul style="list-style-type: none"> <li>• reporting to authorities (e.g., tax authority, police authority, enforcement and supervisory authorities)</li> <li>• obligations related to risk management</li> <li>• accounting activities</li> <li>• handling and monitoring customer complaints</li> </ul> <p>Upon request, Zenito provides more detailed information.</p>
<p><b>Storage of personal data:</b></p>	<p>Zenito retains information necessary for the customer relationship for at least the duration of the customer relationship. After the end of the customer relationship, the retention period depends on the purposes of use of the information, and Zenito complies with its statutory obligations in retaining the information.</p> <p>Zenito retains personal data for as long as necessary to fulfill the purposes defined in the privacy statement for which the personal data was collected and processed unless other legislation requires retaining the personal data for a longer period. If Zenito retains personal data for purposes other than the implementation of the contract, such as for accounting purposes, Zenito retains personal data only if the retention is necessary for that purpose and/or required by legislation.</p> <p>As a general rule, Zenito retains customer data for ten (10) years after the end of the customer relationship to be able to draft, present, and defend legal claims, collect debts or receivables, and demonstrate compliance with legal and regulatory obligations upon request from authorities. However, the retention period depends on the purpose of processing the data on a case-by-case basis. The retention period may be extended if personal data is needed for legal proceedings or other legal processes. Personal data is deleted from our systems and registers within a reasonable time after the personal data is no longer needed.</p> <p>Upon request, Zenito provides more detailed information.</p>
<p><b>Data subject's rights</b></p>	<p>The registered individual has the rights defined by the applicable data protection legislation. The exact application of the rights depends on the purpose and situation of the processing of personal data on a case-by-case basis. The registered individual cannot exercise all rights in all situations. The situation is influenced, for example, by the legal basis for processing personal data. A request regarding the rights of the registered individual can be submitted to Zenito by letter or email.</p>

**To exercise your rights mentioned in this excerpt, please contact:**

1. Zenito Ltd c/o Evli Plc, PL 1081, 00101 Helsinki
2. Zenito Ltd's email, [zenostock@zenito.fi](mailto:zenostock@zenito.fi)

Additionally, we remind you that the registered individual has the right to file a complaint with the competent data protection authority if the registered individual believes that their personal data has been processed in violation of the law. However, we recommend first contacting Zenito directly to resolve the matter regarding the processing of personal data.

Based on the rights defined by data protection legislation, the registered individual has the following rights:

**Right to Information and Access to Personal Data:**

The registered individual has the right to be informed about the collection and processing of their personal data at Zenito. The registered individual has the right to receive confirmed information about whether their data is being processed at Zenito and, if the data is being processed, the right to access the data and receive a copy of the processed data. Additionally, Zenito's customers have the opportunity to check and retrieve their data directly from the online service. Zenito Ltd does not have direct marketing registers.

**Right to Rectification and Deletion of Personal Data:**

If the registered individual's data is processed at Zenito, the registered individual has the right to request the correction of incorrect data or the rectification of inaccurate data. The registered individual also has the right, in specific situations defined by data protection legislation, to request the deletion of their data (right to be forgotten). However, statutory obligations may prevent the implementation of the deletion request.

**Right to Restriction of Processing:**

The registered individual has the right, in situations defined by data protection legislation, to request the restriction of the processing of their personal data. If the personal data suspected to be incorrect or disputed cannot be corrected or deleted, or if there is other uncertainty regarding the deletion request, the processing is restricted for the time necessary for Zenito to verify the accuracy of the data.

**Right to Data Portability:**

The registered individual has the right, in situations defined by data protection legislation, to request the transfer of their data to another data controller. This right applies to personal data provided to the data controller, which is in a structured, commonly used, and machine-readable format, and whose processing is based on the registered individual's consent or contract, and the processing is carried out automatically. The data has the right to be transferred directly from one

	<p>data controller to another if technically possible.</p> <p><b>Right to Object to Processing:</b> The registered individual has the right, in situations defined by data protection legislation, to object to the processing and profiling of their personal data based on legitimate interests. Zenito may refuse the registered individual's request if the processing is necessary for the compelling and legitimate interests of Zenito or a third party. Despite this, the registered individual always has the right to object to the processing of their personal data for direct marketing purposes and related profiling.</p> <p><b>Right to Withdraw Consent:</b> In situations where the processing of the registered individual's personal data is based on the registered individual's consent, the registered individual has the right to withdraw their consent at any time free of charge. The withdrawal does not affect the processing of personal data carried out before the withdrawal. Additionally, the registered individual has the right to withdraw their consent to electronic direct marketing, such as the sending of newsletters or the prohibition of electronic direct marketing. Zenito Ltd does not have direct marketing registers. The prohibition of direct marketing is recorded in the customer register based on the customer's notification.</p> <p><b>Right Not to Be Subject to Automated Decision-Making:</b> The registered individual has the right not to be subject to a decision based solely on automated processing, such as profiling, which has legal effects concerning them or significantly affects them in a similar way. Zenito does not make significant decisions concerning the registered individual based solely on automated data processing and profiling without the registered individual's explicit consent, applicable legal permission, or when automated decision-making is necessary for the conclusion or performance of a contract. The existence of automated decision-making is indicated in connection with the service, and decisions can always be appealed.</p>
<b>Cookies</b>	<p>A cookie is a small text file stored on a tablet, mobile device, or computer. A cookie makes your everyday life easier by storing information about your usage habits on websites and remembering your choices. For example, form data entered using cookies is automatically filled in, so you do not have to fill in the information again each time.</p> <p>More information about cookies is available in Zenito's cookie statement.</p>
<b>Supervisory authority</b>	<p>The registered individual has the right to file a complaint with the competent data protection authority. In Finland, the Office of the Data Protection Ombudsman exercises supervision in accordance with data protection legislation. The Data Protection Ombudsman guides, supervises, and provides advice on the processing of personal data.</p>

The Data Protection Ombudsman's contact information in Finland:  
Tietosuojavaltuutetun toimisto, PL 800, 00521  
Helsinki. [tietosuoja.fi/etusivu](https://tietosuoja.fi/etusivu). \*

*\* This link is an external site. Zenito does not take responsibility for its content.*