

**CUSTOMER-, PARTNER- AND COMMUNICATION REGISTERS - PRIVACY STATEMENT**  
(General Data Protection Regulation (EU) 2016/679, articles 12-14)

This privacy statement explains how Fingrid Oyj processes personal data concerning the management of customer relationships.

It also explains the processing of personal data concerning the management of Fingrid Group's service- and goods suppliers and other stakeholders. Fingrid Group comprises Fingrid Oyj and its subsidiaries Finextra Oy and Fingrid Datahub Oy. Fingrid Oyj deals with questions concerning personal data centrally within the Group, and the execution of the rights of data subjects presented below in this statement.

**1. Contact information for the Registrar**

Fingrid Oyj, Data Protection Officer  
Läkkisepäntie 21  
00620 Helsinki  
PO Box 530, 00101 Helsinki

Fingrid Oyj - telephone switchboard +358 (0)30 395 5000

**2. Person in charge of register matters**

Data Protection Officer Niko Tuononen  
E-mail: DPO@fingrid.fi

**3. The purpose of and grounds for personal data processing**

Personal data is processed by Fingrid for its customer- and partner management, communications and investor information.

Personal data processing is based on an agreement, consent, legal obligation or legitimate interest.

Personal data is processed in order to comply with statutory obligations such as:

Customer relationships;

- The provision of services within the sphere of system responsibility according to the Electricity Market Act
- The provision of grid services according to the Electricity Market Act (connection + online service)

Personal data processing concerning the purchase of services and goods

- Ensuring conformity to the Act on Electrical Safety
- Complying with regulations concerning occupational safety
- Statutory regulations concerning contractor liability and the use of foreign labour

Personal data is processed based on legitimate interest of companies belonging to Fingrid Group, for example in the following connections:

- The management of customer relationships and the development of services
- Service- and goods suppliers: the management and development of supplier relationships and the monitoring of performance in accordance with the contract
- Other stakeholders: Communication with different stakeholders concerning official and company cooperation. Providing information and communicating about transmission line projects.

**4. Personal data to be processed**

Customer relationships:

- basic information such as name, telephone number, address, e-mail address, organisation
- newsletter subscriptions
- analytical data such as monitoring the readers of newsletters
- electricity accounting points, accounting point IDs
- user rights to Fingrid's e-Services / ICT-systems and user data of ICT-systems
- information for event registration (incl. possible dietary requirements)
- picture material
- telephone call recordings (control room operations)

Information concerning the representatives and personnel of service and goods suppliers

- contact details, CVs, roles of suppliers' personnel
- contact details for contractors
- information about security checks
- remarks and warnings given about negligence at work sites
- user rights to Fingrid's e-Services / ICT systems and user data of ICT-systems

Contact details for feedback and those requesting statements received through feedback channels (e.g. intersection statements)

- name
- contact information
- possible building ID or other information specifying the geographical location related to the matter

## **5. Regular data sources**

Data is mainly collected from the data subject him/herself, from the data subject's employer, or from our stakeholders and suppliers with regard to their subcontractors. ICT systems collect user data. Data can also be obtained from other registers of the Registrar or from authorities.

## **6. Regular assignments of data**

Data may be assigned to authorities according to the legal requirements.

## **7. The transfer of data outside the EU or EEA**

Data in a register may be transferred outside the area of member states of the European Union or the European Economic Area, if this is necessary in terms of the purposes of processing the above-mentioned personal data or of the technical execution of the data processing. In that case, the transfer of the data complies with the requirements stipulated in the EU Data Protection Regulation.

## **8. Data protection**

Data is protected by appropriate technical and organizational measures. The paper material is stored in a locked state. Electronic material is protected by technical measures and access to the systems is granted only to those persons for whom it is necessary for their work or function. Fingrid's personnel are bound by professional secrecy. Staff are trained and instructed in the lawful processing of personal data.

External data processors are also required to have adequate technical and organizational protection measures as well as a commitment to confidentiality.

## **9. Time for storing data**

Data is processed and stored for the period of time necessary for accomplishing the original purpose or legal obligations.

## **10. Rights of the data subject**

The data subject has the right to request access from the Registrar to personal data concerning him/herself, the right to request correction of his/her personal data, a limitation on processing and, in certain situations, also to receive the data he/she has given in

machine-readable form.

The data subject has the right to have his/her data removed, insofar as the processing of the data is based on the consent of the data subject, or if the personal data is not required for the purposes described in Section 3. There is no right to the removal of data if Fingrid has a statutory obligation to keep the data, or if Fingrid needs the data to prepare, present or defend a legal claim.

A data subject may use his/her rights by contacting:

Fingrid Oyj / Niko Tuononen  
PO Box 530, 00101 Helsinki

E-mail: [dpo@fingrid.fi](mailto:dpo@fingrid.fi)

#### **11. Automatic decision-making and profiling**

The Registrar does not make decisions based on automatic processing.

#### **12. Making a complaint to the supervisory data protection authority**

If a data subject considers that the processing of his/her personal data breaches applicable legislation, or his/her statutory rights have been infringed, he/she may make a complaint about the matter to the Data Protection Ombudsman whose contact information can be found at the following address: <http://www.tietosuoja.fi/en/>.