

## PRIVACY POLICY

### PROTECTING PERSONAL DATA AT LOWELL

**The thorough processing and protection of your data are important to use. We also want to make sure that you know your rights related to the processing of personal data.**

Lowell aims to help people and companies to keep credit under control, and our services are based on interaction between people.

In this privacy policy, we describe how we process personal data when you meet us as a customer, service partner or job applicant. This privacy policy offers information about your rights, for example, how to access your data.

You can also find the contact details of our data protection officer from this privacy policy. You can also send feedback to our data protection officer on this privacy policy and how it can be improved.

<p><b>1. DATA CONTROLLER</b></p>	<p><b>DATA CONTROLLER</b></p> <p>COLLECTION, CREDIT INFORMATION SERVICES, INVOICING CUSTOMER SERVICE, CUSTOMER RELATIONSHIPS, MARKETING AND RECRUITMENT</p> <p>The data controller regarding collection and credit information services, invoicing customer service, customer relationship, marketing and recruitment is Lowell Suomi Oy (business ID: 0140351-4).</p> <p><b>CONTACT DETAILS</b></p> <p>Exchange: +358 10 270 000</p> <p>Street address: Joukahaisenkatu 6, 20520 Turku, Finland</p> <p>Postal address: P.O. Box 20, 20101 TURKU, FINLAND</p> <p>More contact details: <a href="http://www.lowell.fi">www.lowell.fi</a></p>
<p><b>2. DATA PROTECTION OFFICER</b></p>	<p><b>DATA PROTECTION OFFICER</b></p> <p>Lowell Suomi Oy has appointed a Data Protection Officer that you can contact in matters concerning processing of personal data and other data privacy questions.</p> <p>You can reach our Data Protection Officer via email <a href="mailto:tietosuojavastaava@lowell.com">tietosuojavastaava@lowell.com</a></p>
<p><b>3. FOR WHAT PURPOSES DOES LOWELL COLLECT AND PROCESS PERSONAL DATA?</b></p>	<p><b><i>We process and save personal data about our customers, clients and job applicants for different purposes. These purposes are: 1) collecting outstanding invoices and debts; 2) providing credit information services for other companies; 3) Customer service when providing invoicing activities; 4) customer relationship management and marketing; and 5) recruiting new employees. We</i></b></p>

***only process your data when we have legal grounds to do so.***

***We also process personal data when we carry out actual invoicing activities on the behalf of another company as their service partner. In these situations, we act as the processor of personal data. More information about the processing of data can be obtained from the invoicing company (data controller).***

**COLLECTION**

We process personal data when a payment is not made in accordance with the terms and conditions of the original agreement. In this case, the purpose of processing personal data is to collect an outstanding payment or debt, on the basis, of an assignment issued by our customer, i.e. an invoicer/creditor. Alternatively, we may have purchased the outstanding debt for collection purposes.

Personal data can be used in different situations and for different purposes in the collection process. We process data to carry out voluntary and legal collection processes, including matters related to criminal activities, disputes, insolvency and applications. We also process data to process payments and when we send reports to our clients, the authorities (e.g. execution authorities and courts of law) and credit information companies that maintain a register of payment defaults.

Good customer service is a key part of our collection services. We process your personal data to handle and authenticate customer service situations, offer payment options and agree upon payment arrangements. We also use customer data to understand customer behaviour by means of surveys and statistics, and to develop our services and customer service channels from our customers' points of view. This also includes personnel training.

We process personal data in profiling to facilitate collection planning. In practice, this means that we can carry out collection measures by means of scoring that has been produced on the basis of customer history data and predicts future payment behaviour. We also process data to analyse debts purchased for collection purposes.

In addition, the legislation sets obligations related to the identification of customers, accounting and the prevention of money laundering. We need to process personal data in order to fulfil these obligations.

Personal data related to the payment of debts we have purchased is also processed in decision-making related to our lending activities.

**CREDIT INFORMATION SERVICES**

We process and transfer data about individuals and responsible persons of companies in our credit information services. We provide these contractual services for other lending companies. In this context, we process personal data to identify individuals and to transfer data about creditworthiness. Our credit information services support the decision-making processes of our customer companies.

We also process data for purposes of customer reporting, customer service,

	<p>service development, personnel training and statistics.</p> <p>In addition, we process personal data to fulfill our statutory obligations set for credit information services, such as to save and report credit information surveys at request.</p> <p><b>CUSTOMER SERVICE IN INVOICING</b></p> <p>We process personal data when we carry out customer services related to our invoicing activities and when we authenticate the identity of a customer. Lowell receives identifier information from your biller and compares it with the information received from you in order, to verify your identity.</p> <p>Lowell processes your contact information also when we carry out debt collection services for our billing client in order, to ensure fluent customer service experience. Besides your contact information we may in debt collection also process your bank account information which we have received as part of the invoicing customer service for purposes of returning possible excess payments to you.</p> <p><b>CUSTOMER RELATIONSHIP MANAGEMENT AND MARKETING</b></p> <p>We process and save personal data for purposes of identifying clients and representatives of customers, handling contractual relationships, contact and communication related to customer relationships, service reporting and identifying users of our online and extranet services.</p> <p>We also process personal data related to professional roles to sell and market our services intended for companies and for remarketing purposes.</p> <p><b>RECRUITMENT</b></p> <p>We process and save personal data to review job applications sent to us, conduct job interviews and enter into employment contracts.</p>
<p><b>4. ON WHAT GROUNDS DO YOU PROCESS MY PERSONAL DATA?</b></p>	<p><b><i>We only process personal data when we have legal grounds to do so. Often, the processing of data is based on an agreement between us and our clients or the fulfilment of legitimate interests. In this case, your consent is not needed to process data.</i></b></p> <p><b>COLLECTION</b></p> <p>In collection processes, the processing of personal data is based on the fulfilment of an agreement on a payment. Therefore, the processing of data does not require your consent, as processing is based on your previous agreement signed with us or one of our customers.</p> <p>Personal data is also processed in collection processes to fulfil public interests. The customer-driven professional collection of outstanding invoices and debts enables lending-based finances by reducing any lending disruptions and credit losses. Highly functional collection services provide equal opportunities to receive credit and reasonable credit costs for consumers and companies.</p>

In some situations, processing is based on the fulfillment of statutory obligations. These include the identification of customers, the prevention of money laundering, responding to official queries and accounting.

We can also process your personal data on the basis of your consent. This concerns any additional information we have obtained from you concerning, for example, your state of health. With your consent, we can also disclose your data to third parties. If you do not give your consent, we will not disclose your personal data to third parties.

We also process your personal data on the grounds of our legitimate interests. These are associated with carrying out business activities and producing and developing collection services that respond to the needs of our customers.

**CREDIT INFORMATION SERVICES**

In our credit information services, the processing and transfer of data about individuals and responsible persons is based on the fulfillment of our statutory obligations (e.g. the Credit Information Act) and our legitimate interests, i.e. carrying out and developing our services and for quality assurance purposes, as we have agreed upon with our customers and credit information companies.

**CUSTOMER SERVICE IN INVOICING**

When carrying out invoicing customer services, the processing of personal data is based on the fulfilment of an agreement you have with the biller. Therefore, the processing of data does not require your consent, as processing is based on your agreement with our billing client.

We also process your personal data on the grounds of our legitimate interests. These are associated with carrying out business activities and producing and developing appropriate customer service that meets both our billing clients and your needs.

**CUSTOMER RELATIONSHIP MANAGEMENT AND MARKETING**

With regard to contractual customer relationships, the processing of personal data is based on entering into and fulfilling a service agreement between us and our customers and fulfilling legitimate interests associated with service partnerships. These legitimate interests include communication and service marketing and direct marketing directed at corporate customers.

We also process personal data to fulfill our statutory obligations that are related, for example, to identifying customers and preventing money laundering.

**RECRUITMENT**

The processing of personal data about job applicants is based on requests made by a job applicant who takes part in the recruitment process and/or a relationship (legitimate interest) established when a job applicant submits

	<p>their application in order to be selected for a vacancy.</p>
<p><b>5. CAN I WITHDRAW MY CONSENT TO PROCESSING MY PERSONAL DATA?</b></p>	<p><b><i>In certain situations, we process your personal data on the basis of your consent. In this case, you can withdraw your consent at any time.</i></b></p> <p>You can withdraw your consent by sending a notification to our customer service.</p> <p>After receiving your withdrawal notification, we will no longer process your data based on consent. However, withdrawing consent will not have any impact on any previous processing of data, and it does not prevent your data from being processed when there are other legal grounds for processing, such as the fulfilment of an agreement.</p>
<p><b>6. WHAT DATA DO YOU PROCESS?</b></p>	<p><b>COLLECTION</b></p> <p>In our collection processes, we process and use the following data about our <i>customers</i>:</p> <ul style="list-style-type: none"> <li>• Identification and authentication data (e.g. personal identity code)</li> <li>• Contact information (e.g. address and telephone number)</li> <li>• Information about a representative or agent</li> <li>• Information about the guardianship</li> <li>• Debt information</li> <li>• Payments</li> <li>• Actions we have planned or have taken in relation to the collection process, such as collection letters sent or payment plans agreed upon mutually</li> <li>• Information about the stage of the collection process (e.g. summons, execution)</li> <li>• Banking details</li> <li>• Credit information</li> <li>• Information about income, expenses and wealth</li> <li>• Roles and responsibilities in business activities</li> <li>• Taxation information</li> <li>• Solvency information</li> <li>• Information about contact and service situations</li> <li>• Call recordings</li> <li>• Health information (insofar as it has been obtained from the data subject with their consent or on the basis of a debt, and this information is necessary considering the collection process)</li> </ul> <p>A customer can be represented by a guardian, <i>agent</i> or other <i>contact person, liquidator or debt counsellor</i>. Other stakeholders in collection processes include <i>representatives of our clients</i> and <i>execution authorities</i>. We process the following data about these:</p> <ul style="list-style-type: none"> <li>• Identification and authentication data (e.g. personal identity code)</li> <li>• Contact information (e.g. address and telephone number)</li> <li>• Job title in the company/organisation</li> <li>• Information about contact and service situations</li> <li>• Call recordings</li> </ul> <p><b>CREDIT INFORMATION SERVICES</b></p> <p>In credit information services, we process and transfer data about <i>persons subject to credit information requests</i>:</p>

	<ul style="list-style-type: none"> <li>• Identification information (e.g. personal identity code)</li> <li>• Credit information (in the role of personal data processor)</li> <li>• Positions of responsibility in business activities (in the role of personal data processor)</li> <li>• Requests: credit information requests and persons who made them</li> </ul> <p><b>CUSTOMER SERVICE IN INVOICING</b></p> <p>When carrying out customer services related to invoicing activities we process and use the following personal data of our invoicing customers:</p> <ul style="list-style-type: none"> <li>• Identification and authentication data (e.g. personal identity code)</li> <li>• Contact information (e.g. address and telephone number)</li> <li>• Information about the stage of the invoicing process</li> <li>• Banking details</li> <li>• Payment information</li> <li>• Information about contact and service situations</li> <li>• Call recordings</li> </ul> <p><b>CUSTOMER RELATIONSHIP MANAGEMENT AND MARKETING</b></p> <p>In customer relationship management and service marketing directed at companies, we process the following data about <i>representatives of current and potential customer companies</i> and other users of our services:</p> <ul style="list-style-type: none"> <li>• Identification and authentication data</li> <li>• Contact information (e.g. email address and telephone number)</li> <li>• Job title in the company</li> <li>• Information about contact and service situations</li> <li>• Call recordings</li> <li>• Requests: credit information requests and persons who made them (users of credit information services)</li> </ul> <p><b>RECRUITMENT</b></p> <p>We can process the following data about <i>job applicants</i>:</p> <ul style="list-style-type: none"> <li>• Identification data</li> <li>• Contact information (e.g. address and telephone number)</li> <li>• Information included in the job application (e.g. references and work history)</li> <li>• Credit information (person selected for a vacancy)</li> <li>• Information obtained from aptitude tests</li> </ul>
<p><b>7. WHAT SOURCES DO YOU USE TO OBTAIN DATA?</b></p>	<p><b>COLLECTION</b></p> <p>In collection services, we usually obtain your data from the following sources:</p> <ul style="list-style-type: none"> <li>• Our clients or the original creditor</li> <li>• Our customers, i.e. you (e.g. when you use our services or pay your invoice/debt)</li> <li>• Our customers' representatives/agents/supervisors of interests</li> <li>• Through activities we have carried out</li> <li>• Other companies belonging to the Lowell Group</li> <li>• Bailiffs (execution information)</li> <li>• Courts of law (information about legal collection)</li> </ul>

- The Population Register (addresses and personal data)
- The Legal Register Centre (information about bankruptcies, corporate restructuring and debt arrangements)
- Credit information companies/registers (public payment defaults)
- The Business Information System (business information)
- The Tax authority (public tax information)
- The Finnish Patent and Registration Office (identification data)
- Telephone directory, address and contact information service companies (telephone numbers, addresses)
- Local Registry Offices (information about supervision of interest)
- Official sanction databases (e.g. EU sanctions)

We may request additional information from you, but you are not obligated to provide us with any additional information. However, the non-provision of additional information may have a negative impact, for example, if it needs to be proven that a debt has been paid or a customer complaint is founded.

### **CREDIT INFORMATION SERVICES**

The personal data we process and transfer in the credit information service is obtained from the following sources:

- The creditor
- The customer, i.e. you
- Credit information companies/the credit information register
- The Population Register Centre
- Through activities we have carried out
- Telephone directory and address service companies

You are not obligated to provide any personal data. However, any non-provision of data does not prevent us from making a credit information query or transferring data.

### **CUSTOMER SERVICE IN INVOICING**

- The invoicing client, i.e. biller
- The customer, i.e. you

### **CUSTOMER RELATIONSHIP MANAGEMENT AND MARKETING**

We obtain data about contact people who represent our customers or potential customers from the following sources:

- The customer company you represent
- A contact person who represents the customer company, i.e. you
- Through activities we have carried out
- The Business Information System
- Marketing data companies
- Providers of telephone numbers and addresses
- Credit information companies/credit information registers

You do not have any obligation based on the legislation or customer agreement to provide any personal data. However, any non-provision of the data requested may mean that you cannot use all of our services or you do not obtain information about our services.

	<p><b>RECRUITMENT</b></p> <p>When a person applies for a vacancy, we obtain data from the following sources:</p> <ul style="list-style-type: none"> <li>• The applicant</li> <li>• Referees indicated by the applicant</li> <li>• Credit information companies/credit information registers</li> <li>• Aptitude tests and recruitment consultants</li> </ul> <p>Being a job applicant, you do not have any obligation based on the legislation or agreement to provide any personal data. However, any non-provision of data important considering the recruitment process may mean that your application is processed with incomplete data or that it is not processed.</p>
<p><b>8. TO WHOM DO YOU DISCLOSE MY DATA?</b></p>	<p><b><i>We do not disclose or sell your personal data to any third parties without your consent.</i></b></p> <p><b>COLLECTION</b></p> <p>We only disclose your personal data to parties involved in the collection process. We do not disclose any data to third parties.</p> <ul style="list-style-type: none"> <li>• Clients whose claims we are collecting</li> <li>• The customer, i.e. you</li> <li>• The customer’s representatives/agents/supervisors of interests</li> <li>• Courts of law</li> <li>• Bailiffs</li> <li>• Supervisory authorities, i.e. the Finnish Competition and Consumer Authority and Regional State Administrative Agencies</li> <li>• The police</li> <li>• Official receivers designated by courts of law</li> <li>• Credit information companies</li> <li>• Telephone directory, address and contact information service companies for checking data</li> <li>• The Population Register Centre for checking data</li> <li>• Subcontractors we use to produce collection services (e.g. printing and mailing companies, IT service providers, Lowell’s group companies and agents)</li> </ul> <p>For the purpose of debt collection (exercise of legal claim) we can also disclose data about your identification and debt liabilities for to our agents in a third country, if the customer lives in that third country. Otherwise, we do not disclose any data to third countries.</p> <p><b>CREDIT INFORMATION SERVICES</b></p> <p>In credit information services, we can disclose your personal data to:</p> <ul style="list-style-type: none"> <li>• Lending companies that use the services</li> <li>• The person subject to a credit information query</li> <li>• Credit information companies</li> <li>• The Population Register Centre</li> <li>• Subcontractors we use to produce our services (e.g. IT service suppliers, other Lowell group companies)</li> </ul> <p>We do not disclose your personal data to any third countries.</p>



	<p><b>CUSTOMER SERVICE IN INVOICING</b></p> <p>We only disclose your personal data to those invoicing clients, i.e. billers from whom you have received an invoice. In addition, your data can be disclosed to subcontractors we use to produce invoicing activities (e.g. printing and mailing companies and IT service providers).</p> <p><b>CUSTOMER RELATIONSHIP MANAGEMENT AND MARKETING</b></p> <p>We can disclose personal data about representatives of our customer companies and potential customer companies to:</p> <ul style="list-style-type: none"> <li>• Subcontractors we use in communication, marketing and direct marketing services</li> <li>• The customer company the contact person represents</li> <li>• The contact person</li> <li>• Other Lowell group companies</li> </ul> <p>Your personal data (e.g. name, email address) can be processed by Lowell´s vendors as a course of the acquired marketing system and webinar services in a third country, i.e. outside EU/EEA. Standard data protection clauses adopted by EU commission are used as the safeguards for data processing as part of data protection agreement. For more information, please see contact information in section 2 above.</p> <p><b>RECRUITMENT</b></p> <p>We can disclose personal data about job applicants to:</p> <ul style="list-style-type: none"> <li>• Providers of aptitude test services</li> <li>• Data system suppliers</li> <li>• Other Lowell group companies</li> </ul> <p>We do not disclose your personal data to any third countries.</p>
<p><b>9. FOR HOW LONG DO YOU STORE MY PERSONAL DATA?</b></p>	<p><b><i>We store your data for as long as is necessary for the purposes for which the data was collected and saved.</i></b></p> <p><b>COLLECTION</b></p> <p>Even if the collection process ends, we will store your data for as long as is necessary for the purposes for which the data was collected and saved. The need to store your data is based, for example, on the legislation or a service agreement we have entered into with our client.</p> <p>The customer and the supervisory authority (the Finnish Competition and Consumer Authority, Regional State Administrative Agencies) have the right to make queries related to collection processes and present claims, even after the collection process. For this reason, it is necessary to store personal data after collection processes.</p> <p>We retain personal data related to the identification of the customer, the prevention of money laundering and accounting purposes for the time defined in the legislation.</p>

	<p><b>CREDIT INFORMATION SERVICES</b></p> <p>We store personal data processed in the service for three (3) years following a credit information query.</p> <p><b>CUSTOMER SERVICE IN INVOICING</b></p> <p>We store your data for as long as is necessary for the purposes for which the data was collected and saved. The need to store your data is based, for example, on the legislation or a service agreement we have entered into with our client.</p> <p><b>CUSTOMER RELATIONSHIP MANAGEMENT AND MARKETING</b></p> <p>We store the data we have used in customer relationship management and marketing for as long as is necessary and proper considering the purpose of use.</p> <p><b>RECRUITMENT</b></p> <p>We store personal data related to job application processes for two (2) years after a new employee has been recruited. We retain open job applications for six (6) months after their receipt.</p>
<p><b>10. DO YOU USE MY PERSONAL DATA IN AUTOMATED DECISION-MAKING OR PROFILING?</b></p>	<p><b><i>We process personal data automatically to control collection processes and make credit decisions.</i></b></p> <p><b>COLLECTION</b></p> <p>We use profiling based on the automated processing of personal data to plan collection activities. The purpose is to evaluate the customer's solvency and predict future payment behavior, on the basis, of data about the collection history and public credit and tax data. The score calculated, on the basis, of data helps us to select the most suitable collection activities considering each customer and to avoid any unnecessary activities that accumulate collection costs for.</p> <p>The automated processing of data does not result in any significant consequences for the customer, and it has no impact on the customer's rights. The aim is, for example, to foresee any cases and situations where the launch of a legal collection is not purposeful.</p> <p><b>RECRUITMENT</b></p> <p>We use an automated decision-making process for some recruitments. In these situations, recruitment includes questions that we expect you to answer when you submit your application. The purpose of the questions is to find out if your application will be taken to the next stage of the recruitment process. The automated decision-making process uses the response you provide during the application process to determine if you meet the minimum requirements for our open position at Lowell.</p> <p>An automated decision-making process is essential to the conclusion of an employment contract and helps us ensure that our decisions are prompt, fair, efficient and accurate based on the information you provide us. We ask things that are relevant to the job and employment at Lowell.</p>

	<p>If we choose not to proceed based on your response to your application, you have the right to ask us to review the automated decision we have made based on your response.</p> <p>To exercise your GDPR rights related to automated decision making, please contact <a href="mailto:hr.nordics@lowell.com">hr.nordics@lowell.com</a></p>
<p><b>11. HOW CAN I ACCESS MY OWN DATA?</b></p>	<p><b><i>You have the right to access your personal data. We will send you your data in writing no later than one (1) month after receiving your request.</i></b></p> <p>You can request your data:</p> <ul style="list-style-type: none"> <li>• by completing an online form in our web pages <a href="http://oma.lowell.fi">oma.lowell.fi</a>; you need to use your banking codes to verify your identity</li> <li>• by sending a written request to Lowell Suomi Oy, Rekisteripalvelut, P.O. Box 20, 20101 Turku; please remember to sign your request with your personal signature</li> <li>• by calling our customer service</li> </ul>
<p><b>12. WHAT OTHER RIGHTS DO I HAVE?</b></p>	<p><b>HAVING YOUR DATA RECTIFIED</b></p> <p>If you notice that your personal data is incomplete or incorrect, you have the right to request your data to be rectified. When you send us a request for rectification, please identify the data to be rectified in detailed and explain why the data needs to be rectified.</p> <p><b>HAVING YOUR DATA ERASED</b></p> <p>You have the right to request your data to be erased if 1) your data is no longer needed for the purpose for which it was collected; 2) you withdraw your consent; 3) you object to the processing of your data; or 4) your data has been processed illegally.</p> <p>When your data is processed to fulfill statutory obligations or legal claims or for statistical purposes, we may not be able to erase your data, even if you request us to do so.</p> <p><b>RESTRICTING THE PROCESSING OF YOUR DATA</b></p> <p>You have the right to request the processing of your data to be restricted, for example, when we are investigating the correctness of data or processing your request to have your data erased.</p> <p>You can also request the processing of your data to be restricted in situations where you want your data to be retained (e.g. due to a legal claim) and it would otherwise be erased following the end of the grounds for processing.</p> <p><b>HAVING DATA TRANSFERRED FROM ONE SYSTEM TO ANOTHER</b></p> <p>When the processing of data is based on your consent or when we obtain data in conjunction with an agreement, you have the right to obtain your data in machine-readable format, provided that it is processed in an automated process.</p>

	<p><b>OBJECTING TO THE PROCESSING OF DATA</b></p> <p>When the processing of your personal data is based on legitimate or public interests, you have the right, on grounds based on specific personal reasons, to object to the processing of your data.</p> <p>However, we may not stop processing your data, even if you objected to it, if the processing of your data is necessary or if we are carrying out a legal claim.</p> <p>This right also applies to direct marketing. Recipients of our newsletters and direct marketing messages can always unsubscribe to our newsletters and messages or refuse to receive such messages in the future.</p> <p><b>REQUESTS RELATED TO PERSONAL DATA:</b></p> <p>You can submit requests related to your personal data:</p> <ul style="list-style-type: none"> <li>• by sending a written request to Lowell Suomi Oy, Rekisteripalvelut, P.O. Box 20, 20101 Turku; please remember to sign your request with your personal signature</li> <li>• by calling our customer service</li> <li>• by completing an online form (requests to access data)</li> </ul> <p>We will process your request as soon as possible. If we cannot carry out your request within one (1) month, we will let you know.</p> <p>To protect your identity, we will verify any electronic requests using banking codes and written requests using a personal signature. If you call our customer service, we will verify your identity using control questions.</p>
<p><b>13. HOW CAN I FILE A COMPLAINT REGARDING THE PROCESSING OF MY PERSONAL DATA?</b></p>	<p>You have the right to file a complaint regarding the processing of personal data with the data protection authority. In Finland, this authority is the Data Protection Ombudsman:</p> <p><b>Office of the Data Protection Ombudsman</b></p> <p>Exchange: +358 29 56 66700          Street address: Ratapihantie 9, 6th floor, 00520 Helsinki          Postal address: P.O. Box 800, 00521 Helsinki, Finland          Email: tietosuoja@om.fi</p> <p><a href="http://www.tietosuoja.fi">More contact information: www.tietosuoja.fi</a></p>