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Privacy Statement

Data controller

Söderberg & Partners Oy (business ID: 3142631-1)

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Personal data processing at Söderberg & Partners

As an insurance broker, we take the processing of personal data seriously and comply with the EU General Data Protection Regulation 2016/679 ("GDPR") and other applicable data protection legislation when processing personal data. This means that we only process personal data that is necessary for the purposes defined in this Privacy Statement. The personal data will also be erased when they are no longer required.

The types of personal data we process about you and the purposes for which they are processed depend on your relationship with Söderberg & Partners. In this Privacy Statement, you can read how we process your personal data based on the applicable service or person category.

Definitions

In this Privacy Statement, the following concepts are defined as follows:

Due diligence information – information related to our obligation to identify and know the client and to prevent money laundering, such as information about your identity verification document. Due diligence information also includes information about your corporate involvement and information about: (i) whether you or a person belonging to your close circle is a politically influential person; (ii) whether you are the beneficial owner; and (iii) whether you are subject to national or international sanctions.

Cookies – small text files with data that are stored on your terminal device in the browser when you use a website. Techniques and tools that retrieve and store data in your browser in a way similar to cookies are also called cookies.

Service supplier – a supplier of various services, such as a supplier offering maintenance, server and IT support services, who processes personal data on our behalf. Our service suppliers also include service suppliers who offer insurance broker services. The service suppliers process personal data on our behalf in accordance with our instructions and the contracts concluded with us.

Family relationship information – information about your family relationships, e.g. your marriage, partner, number of children and other close relatives.

Financial information – information about your financial situation, such as your income and assets.

Health information – for example, health information related to signing certain insurance conditions, such as information about sick leave or parental leave.

Information about corporate involvement – e.g. board assignments, shareholding in companies and what degree of involvement you have in the company (i.e. passive or active involvement).

Employment information – information related to your employment relationship, such as job title, profession, education, employer and form of employment relationship.

Insurance information – information about your insurance, e.g. employment pension insurance or other personal insurance.

Contact information – information used to contact you, such as your e-mail address and phone number.

Processing of personal data in the production of our services and client service

Here you can read more about how we process personal data in the various services we provide. Read more about the processing of personal data in the sections that interest you below.

Personal data is not subject to automated decision-making or profiling.

Insurance brokerage through your employer or directly to you as a private individual

Client

What kind of personal data do we process?

We may process for example the following personal data: name, phone number, address, e-mail address, date of birth, personal identity code, insurance information, due diligence information, recordings of customer service calls, financial information, health information, family relationship information and employment information.

From where do we collect personal data?	We primarily collect personal data from you and/or your employer or another company or organisation with which you have an employment-like relationship. We also collect your personal data from insurance companies, the internet and publicly available sources, such as Suomen Asiakastieto Oy, the Finnish Patent and Registration Office, the Finder service, the Business Information System and other registers maintained by authorities as well as economic sanctions lists maintained by international organisations. We also receive personal data from other companies in the Söderberg & Partners group for marketing purposes.
What is the purpose of the processing of personal data?	Advisory services: The purpose of the processing is to advise you in choosing insurance (e.g. comparing and analysing different options to find a suitable insurance) and to manage the insurance belonging to you or your employer, your member organisation or your group insurance solution. Customer Service: We process your personal data in order to assist you with any questions and matters related to our services. Documentation requirements: If you are a sole trader, we process your personal data to comply with the statutory documentation requirements applicable to our business. Client due diligence: We process due diligence information in order to fulfil our statutory obligations under the current anti-money laundering and sanctions legislation. Marketing: we process your personal data to market our services. (You can find more information about our marketing process in the Personal data processing for marketing purposes section.)
Required or optional?	The personal data we collect about you is required to enable us to provide insurance services. Providing an e-mail address to facilitate contact is optional.
What is Söderberg & Partners' legal basis for processing?	The basis for the processing of personal data is the fulfilment of our statutory obligations related to documenting the client relationship and identifying and knowing the client and preventing money laundering, and the implementation of the contract you have concluded with your employer or the contract concluded directly with us, or the implementation of measures preceding it. We process your personal data based on a legitimate interest in the marketing of our services. [The processing of personal data may also be based on your consent. In this case, you have the right to withdraw your consent at any time.]
Who are the recipients of personal data and in which	The data we process about you are sent to the insurance company where your insurance policy is held and to your employer. We may also

countries are they located?

provide our service suppliers with the necessary information for the performance of our services, for example, in connection with data storage. We also use service providers who offer insurance broker services in the processing of personal data. The service suppliers process personal data on our behalf in accordance with our instructions and the contracts concluded with us. In addition, personal data is disclosed to the health service providers used by insurance companies.

If necessary, personal data may also be disclosed to competent authorities to fulfil the statutory obligations.

The recipients are mainly located in Finland or the EU/EEA area. In some cases, we use service suppliers located outside the EU or EEA, in which case personal data may be transferred outside the EU/EEA. In these cases, we ensure that personal data is transferred only as required by data protection legislation, such as standard contractual clauses approved by the European Commission (GDPR Art. 46(2), point (c)). In addition, your contact information may be shared with other companies in the Söderberg & Partners group as well as our selected partners for marketing purposes. (You can find more information about our marketing process in the Personal data processing for marketing purposes section.)

How long will the personal data be stored?

We will store the personal data we collect for as long as necessary for the purposes for which they are processed or for clarifying our responsibilities and obligations. In any case, personal data will be stored in accordance with possible statutory retention periods.

We will store your personal data for as long as necessary with regard to the period of insurance and the period in which insurance claims can be filed. We may store event data or correspondence until the time limit for filing claims for that event expires. We normally store data for 11 years after our contract with you or the company/organisation has been terminated.

We will store due diligence information for five years after the end of a regular client relationship in accordance with the Act on Preventing Money Laundering and Terrorist Financing.

We store personal data processed for our accounting and annual reports in accordance with accounting legislation.

We may store personal data longer than stated in this Privacy Statement if the processing is necessary to prepare, present or defend a legal claim.

We store personal data for marketing purposes for the duration of the client relationship, but only as long as you have agreed to the processing based on your consent.

We regularly assess the need to store personal data in accordance with our internal data protection policy. We will correct incorrect or inaccurate personal data in relation to the purposes of the processing without delay. We will erase the personal data when it is no longer necessary to store them on the basis of the reasons stated in this Privacy Statement.

Relative

What kind of personal data do we process?

We may process the following personal data: name, family relationship information. We may also process due diligence information, such as information about whether you are a politically influential person. If you are listed as a beneficiary of one of your relative's insurance policies, your personal identity code may also be processed.

From where do we collect personal data?

We collect the information from your relative who is a client of ours. They are not obligated to disclose your personal data to us. We may also receive personal data from third-party registers, such as registers maintained by authorities and economic sanctions lists maintained by international organisations.

What is the purpose of the processing of personal data?

The purpose of the processing is to give advice to our client and to comply with the regulations regarding documents related to our business. Information is also processed to make changes to insurance policies and to process insurance claims. The purpose of the processing of your personal data is also to fulfil our statutory obligations related to identifying and knowing the client and preventing money laundering.

What is Söderberg & Partners' legal basis for processing?

The processing is based on the Act on the Provision of Insurances (234/2018). Our right to process due diligence information is based on our legal obligation.

Who are the recipients of personal data and in which countries are they located?

If necessary, personal data may be disclosed to competent authorities to fulfil the statutory obligations as well as insurance companies. In addition, personal data may also be sent to health service providers.

We may disclose to our service suppliers the necessary information for the performance of our services, for example, in connection with data storage. If you are a beneficiary in your relative's insurance policy, necessary personal data can be disclosed to the insurer. We also use service providers who offer insurance broker services in the processing of personal data. The service suppliers process personal data on our behalf in accordance with our instructions and the contracts concluded with us.

The recipients are mainly located in Finland or the EU/EEA area. In some cases, we use service suppliers located outside the EU or EEA, in which

case personal data may be transferred outside the EU/EEA. In these cases, we ensure that personal data is transferred only as required by data protection legislation, such as standard contractual clauses approved by the European Commission (GDPR Art. 46(2), point (c)).

How long will the personal data be stored?

We will store your personal data for as long as necessary with regard to the period of insurance and the period in which insurance claims can be filed. We may store event data or correspondence until the time limit for filing claims for that event expires. We normally store data for 11 years after our contract with you or the company/organisation has been terminated. We will store your due diligence information for five years after the end of your relative's regular client relationship in accordance with the Act on Preventing Money Laundering and Terrorist Financing.

We regularly assess the need to store personal data in accordance with our internal data protection policy. We will correct incorrect or inaccurate personal data in relation to the purposes of the processing without delay. We will erase the personal data when it is no longer necessary to store them on the basis of the reasons stated in this Privacy Statement.

Insurance brokerage – non-life insurance

What kind of personal data do we process?

If you are a contact person at a company or organisation that Söderberg & Partners has a brokerage assignment with, we process the following personal data: name, phone number, e-mail address and the type of position you hold at the company or organisation. If you are a sole trader, we also process your personal identity code. If you are named as an employee or otherwise named in an insurance or insurance policy, which has been signed by a company or organisation that Söderberg & Partners has a brokerage assignment with, we process personal data about you that is necessary for the insurance in question. The personal data include personal identity code, name and insurance information. If Söderberg & Partners assists a company or organisation in the event of damages, information concerning the damages is processed. If you as an individual subscribe to insurance via Söderberg & Partners, we process your name, personal identity code, address, phone number, e-mail address, financial information, health information, family relationship information and employment information as well as the due diligence and insurance information attributable to the insurances in question.

From where do we collect personal data?

We collect personal data directly from you. We may also collect personal data from an employer, member organisation, group representative or another company or organisation with which Söderberg & Partners has a brokerage assignment with. [We may also receive personal data from third-party registers, such as registers maintained by authorities and economic sanctions lists maintained by international organisations.]

What is the purpose of the processing of personal data?	Quotations: If you are a contact person in a company or organisation, we process your employment information and contact information in order to provide a quote on insurance solutions. Advisory services: The purpose of the processing is to advise and help you or the company/organisation that Söderberg & Partners has a brokerage assignment with in choosing insurances and managing the insurances that you or the company/organisation have. We may also process your personal data in order to take measures related to taking out a new insurance or preparing for claims or claims management. Documentation requirements: The purpose is also to comply with the legal documentation requirements applicable to our business. Marketing: we may process your personal data to market our services. (You can find more information about our marketing process in the Personal data processing for marketing purposes section.)
Required or optional?	The personal data we collect about you is required for us to mediate insurance. However, providing an e-mail address and phone number to facilitate contact is optional.
What is Söderberg & Partners' legal basis for processing?	The lawful basis for processing personal data for you as a policyholder or as a recipient of advice from us is to fulfil the contract or perform the preparatory work ahead of signing a contract. We also have a legal obligation to document each client relationship. If we have a contract with your employer, member organisation or group representative, or with another company/organisation that is our client, but we do not have a contract with you, we process your personal data based on a legitimate interest. In this case, we process your personal data to fulfil our contractual relationship with the client or to perform the preparatory work prior to entering into such a contract. In addition, we process your personal data based on a legitimate interest in the marketing of our services. The processing of personal data may also be based on your consent. In this case, you have the right to withdraw your consent at any time.
Who are the recipients of personal data and in which countries are they located?	If necessary, personal data may be disclosed to competent authorities to fulfil the statutory obligations. In addition, personal data may be sent to health service providers. The data we process about you are sent to the insurance company where your insurance policy is held and to your employer. We may also provide our service suppliers with the necessary personal data for the performance of our services, for example, in connection with data storage. We also use service providers who offer insurance broker services in the processing of personal data. The service suppliers process

personal data on our behalf in accordance with our instructions and the contracts concluded with us.

In addition, your contact information may be shared with other companies in the Söderberg & Partners group as well as our selected partners for marketing purposes. (You can find more information about our marketing process in the Personal data processing for marketing purposes section.)

The recipients are mainly located in Finland or the EU/EEA area. In some cases, we use service suppliers located outside the EU or EEA, in which case personal data may be transferred outside the EU/EEA. In these cases, we ensure that personal data is transferred only as required by data protection legislation, such as standard contractual clauses approved by the European Commission (GDPR Art. 46(2), point (c)).

How long will the personal data be stored?

We will store the personal data we collect for as long as necessary for the purposes for which they are processed or for clarifying our responsibilities and obligations. In any case, personal data will be stored in accordance with possible statutory retention periods.

We will store your personal data for as long as necessary with regard to the period of insurance and the period in which insurance claims can be filed. We may store event data or correspondence until the time limit for filing claims for that event expires. We normally store data for 11 years after our contract with you or the company/organisation has been terminated.

We will store due diligence information for five years after the end of a regular client relationship in accordance with the Act on Preventing Money Laundering and Terrorist Financing.

We store personal data processed for our accounting and annual reports in accordance with accounting legislation.

We may store event data or correspondence until the time limit for filing claims for that event expires. We may store personal data longer than stated in this Privacy Statement if the processing is necessary to prepare, present or defend a legal claim.

We store personal data for marketing purposes for the duration of the client relationship, but only as long as you have agreed to the processing based on your consent.

We regularly assess the need to store personal data in accordance with our internal data protection policy. We will correct incorrect or inaccurate personal data in relation to the purposes of the processing without delay. We will erase the personal data when it is no longer necessary to store them on the basis of the reasons stated in this Privacy Statement.

Personal data processing in client service

Personal data may be processed within companies belonging to the same group as Söderberg & Partners Oy. Upon request, we will provide information about which companies are included in the group. Requests can be sent to viestinta@soderbergpartners.com.

Processing of personal data related to client due diligence

What kind of personal data do we process?	We may process due diligence information, such as information about whether you are a beneficial owner or a politically influential person.
From where do we collect personal data?	We primarily receive personal data directly from you. We may also receive personal data from your employer or another company or organisation with which you have an employment-like relationship. In addition, we receive personal data from third parties, such as registers maintained by authorities and economic sanctions lists maintained by international organisations.
What is the purpose of the processing of personal data?	We use your personal data to fulfil our statutory obligations related to identifying and knowing the client and preventing money laundering.
What is Söderberg & Partners' legal basis for processing?	The processing of personal data is based on our legal obligation. In addition to our statutory obligation, the processing of personal data may also be based on the implementation of a contract.
Who are the recipients of personal data and in which countries are they located?	We may disclose personal data to authorities to the extent permitted and required by law. In addition, we may disclose your personal data to our service supplier, who processes personal data on our behalf. We have concluded a contract with the service supplier on the processing of personal data. In addition, we may disclose personal data to companies in the Söderberg & Partners group to the extent permitted and required by law, such as when it is necessary in order to fulfil our contractual and statutory obligations. We do not transfer personal data outside the EU or EEA.
How long will the personal data be stored?	We will store your personal data for only as long as necessary to fulfil the defined purpose of use. We will store your personal data for five years after the end of a regular client relationship or for five years from the completion of a transaction.

Processing of job applicants' personal data

What kind of personal data do we process?

We may process the following personal data: name, contact information and date of birth, as well as information included in your job application or resume, such as information about your language skills, work experience, competence and educational background, salary request and picture. In addition, as the recruitment process progresses, we may process, for example, the following personal data: positions applied for, personal data provided during job interviews, notes about the job application and, if necessary, referees and information related to personal evaluations and aptitude assessments.

From where do we collect personal data?

We primarily collect personal data directly from you. We may also collect your personal data from your referees or a public website you have attached to your job application (such as LinkedIn). In addition, we may receive your data from a company offering employment and personnel services or from companies belonging to the Söderberg & Partners group if you have given your consent to this.

What is the purpose of the processing of personal data?

The purpose of the processing of your personal data is, for example, to process your job application, assess your eligibility and suitability for the job you have applied for, organise job interviews and communicate to you about the recruitment process.

What is Söderberg & Partners' legal basis for processing?

The processing of personal data is based on a contract when you ask us to carry out measures prior to an employment contract with your application. To the extent permitted by applicable law, we may process your personal data based on your consent for conducting personal evaluations and aptitude assessments. We may use your personal data based on our legitimate interest to be able to contact you directly and offer a suitable job.

Who are the recipients of personal data and in which countries are they located?

We may transfer or disclose data to third parties to the extent permitted and required by law: (i) to a partner managing the recruitment process who processes personal data on our behalf; (ii) to our other service suppliers for the performance of our services, for example, in connection with data storage; and (iii) when the disclosure of personal data is necessary to exercise our rights, to protect the safety of the data subject or other persons, to investigate misconduct or to respond to a request from an authority.

We may transfer personal data outside the EU or EEA when it is necessary in order to fulfil the purpose of using the personal data, such as when our partner who manages the recruitment process is located outside the EU or EEA. In this case, we ensure that personal data is transferred only as required by data protection legislation, such as standard contractual

clauses approved by the European Commission (GDPR Art. 46(2), point (c)).

How long will the personal data be stored?

We will store your personal data for only as long as necessary for the purpose of use (possible recruitment), taking into account the storage periods specified in the law, however, for a maximum of two years from the submission of the application. With the consent of the applicant, personal data may also be stored for a longer period of time (the time indicated when consent was given), for example, for future recruitment processes. Personal data may also be stored for a longer period of time if it is necessary in order to fulfil statutory obligations.

Automated decision-making and profiling

The processing of personal data may include profiling in connection with evaluating your suitability and competence for the position you have applied for. We may use artificial intelligence in profiling.

Personal data processing in marketing and communications

From where do we collect the data?

We collect personal data directly from you, from companies belonging to the Söderberg & Partners group whose client your employer or the company you represent is, and from external channels and public sources, such as Vainu. We also collect personal data e.g. from our website using cookies that the visitor to the site is asked to accept when they first visit the site.

What is the purpose of the processing of personal data?

We collect information for marketing purposes to help those who are interested in us and our own clients find interesting services for themselves and to develop our services, systems and products. We also use personal data to communicate current affairs and keep our clients up to date with current events and changes in the insurance industry.

We process your name and contact information to contact you if you fill out our contact form and request that we contact you. The purpose of the processing is to respond to your enquiry.

The purpose of the processing of personal data collected using cookies is to improve your user experience on our website. The purpose is also to ensure the functionality of our website, analyse visitor statistics and provide relevant services and offers to you through online advertising.

If you indicate that you do not wish to receive marketing materials from us, we will no longer approach you for marketing purposes.

Is the processing of personal data mandatory?

When visiting our website for the first time, visitors decide for themselves what kind of information we may collect from them. We only use non-essential cookies with your consent.

You have the right to refuse our marketing at any time by notifying us at info.finland@soderbergpartners.com. Our newsletters also have the option to cancel your subscription.

How long will the personal data be stored?

As a general rule, we retain the personal data we collect for marketing purposes for three years. If you or your employer have a client relationship with us, we will retain your personal data for at least the duration of the client relationship. Even then, you can block marketing contacts. If you have subscribed to our newsletter yourself or otherwise indicated that you would like to receive marketing communications from us, we will retain your personal data for the duration of the subscription. You may opt out of receiving marketing communications at any time by contacting info.finland@soderbergpartners.com.

What types of personal data do we process?

Within the framework of the contract we have concluded with you or the company you represent, we process the following personal data: name, e-mail address, address and phone number. If you represent a company, we also collect information about your position in the company.

For event invitations, we process the following personal data: name and e-mail address. If you indicate that you are interested in our company using the form on our website, we process the following personal data: name, company, phone number, e-mail address and any other information you may have provided on the form.

If we have recorded a reference video about you for marketing purposes, we store your name, position and the name of the company you represent in addition to the video recording.

Disclosure or transfer of personal data outside the group for marketing purposes

Söderberg & Partners may disclose your personal data for marketing purposes to another data controller outside the group only with your consent. In this case, the purpose of the processing is to provide insurance services to companies interested in them. Söderberg & Partners minimises the amount of personal data to be disclosed. The personal data to be disclosed include [name, phone number and e-mail address].

Söderberg & Partners may use Health & Benefits Oy or other external processors for the processing of personal data on behalf of Söderberg & Partners.

Automated decision-making and profiling

We use profiling in marketing when we segment recipients based on factors such as industry, role, company size, stage of the customer relationship, or the content they have downloaded or read. The information may be sourced from our customer relationship management (CRM) system, website, and

marketing automation platform. We do not use profiling to make automated decisions that produce legal effects or similarly significant impacts on individuals.

Principles of personal data protection

Söderberg & Partners has strong information security. This means that we have strong technical measures to protect personal data, such as firewalls and an intrusion detection system. Access to personal data is limited only to those persons who, due to their work tasks, must have access to processed personal data. We set equally high data protection requirements for other parties that process your personal data on our behalf.

Rights of the data subject

The rights of the data subject depend on the purposes and circumstances of personal data processing.

According to the General Data Protection Regulation (GDPR), you as a data subject have the right:

- to inspect and obtain access to your personal data;
- to the rectification of your data;
- to the erasure of your data unless there is a legal basis for retaining the data;
- to object to the processing of your data on grounds relating to your particular situation. If personal data is processed for direct marketing, you have the right at any time to object to the processing of your personal data for such marketing, including profiling to the extent that it is related to such direct marketing.
- to request the restriction of the processing of your data; and
- to data portability.

If the processing of your personal data is based on your consent, you have the right to withdraw your consent at any time.

Your rights may be limited by legislation.

The data subject has the right to file a complaint with the supervisory authority, especially in the member state of their permanent residence or workplace or where the alleged breach of the data protection regulation occurred if the data subject considers that the processing of their data is an infringement of applicable data protection legislation. In Finland, the supervisory authority is the Data Protection Ombudsman.

You can send questions related to the processing of personal data and requests regarding the exercise of the data subject's rights to the data controller at info.finland@soderbergpartners.com