



### 1. About this privacy notice

This privacy notice contains information on how Euroclear Finland Oy ('Euroclear Finland') processes the personal data of its clients ('Client'). This notice does not apply to the processing of personal data within the book-entry system. A separate notice applicable to the book-entry system is available on the Euroclear Finland website.

### 2. Purpose and legal basis for processing of personal data

Client data is collected and processed for the primary purpose of managing Euroclear Finland's client relationships, client interaction and management of customer feedback (including surveys) to which Euroclear Finland has a legitimate business interest. Client data is also used for customer communication and marketing, to which Euroclear Finland has also a legitimate business interest to communicate and promote Euroclear Finland's product and services.

Client data is stored in Euroclear customer relations management system, access management system and email marketing tool. Clients may always opt-out from receiving newsletters and direct marketing messages, for which the marketing tool is used.

Euroclear Finland has a legal obligation to identify and verify the identity of its client and personal data is collected for this purpose and is used to counteract money laundering and terrorist financing, to expose and investigate money-laundering and terrorist financing and to report any criminal activity where the property or proceeds of crime, which are subject to money laundering and terrorist financing, are derived from. Euroclear Finland may process personal data as a part of screening against sanction lists.

### 3. Personal data being processed

The following personal data is processed as a part of customer relations management:

- Name
- Address, phone numbers, email address, fax number
- Company
- Job title
- Information that the person in question is no longer employed by the company
- The person's role in relation to Euroclear Finland
- Information on if the person in question is acting on behalf of someone in relation to Euroclear Finland
- If the person belongs to any of Euroclear Finland's mailing lists
- notes from client meetings

Additionally other information related to managing client relations are collected, such as data on communications with clients, sent documents and arranged meetings.

The personal data in question is collected in relation to the services being provided. The processing is done manually by Euroclear Finland's employees and automatic decision-making or profiling is not performed.

Euroclear Finland collects personal data on companies' representatives, beneficial owners and based on a legal obligation. Personal data may include: social security number and a copy of official identification. Additionally Euroclear Finland may collect information from third parties and publicly accessible sources that provide information on beneficial owners and politically exposed persons.

As a general rule Client data is retained for the duration of the client relationship. Data is retained for a minimum of 10 years from the end of the customer relationship as required by the EU Central Securities Depository Regulation. Information collected for purposes of identifying and verifying the identity of clients is kept for 5 years from the end of the client relationship.

### 4. Data sources

Client data is primarily collected directly from Clients.

Additional data may be collected from third parties and publicly accessible sources (i.e. trade registers, the population register and sanction lists).

## **5. Regular disclosure of data**

Client data is not regularly disclosed.

## **6. Transfers of personal data outside EU or EEA**

Euroclear Finland may in some situations transfer personal data outside of the EU and EEA.

External service providers are used for system maintenance. Our service providers' partners may operate outside the European Union or the European Economic Area. In such cases, the secure and appropriate processing of personal data is ensured by an agreement between Euroclear Finland and the processor, taking into account the standard contractual clauses of the European Commission in accordance with the GDPR, or using other appropriate safeguards.

## **7. Security measures**

Euroclear Finland secures the personal data being processed using appropriate technical and organizational measures. Client data can only be processed by individuals authorized to do so as a part of carrying out their duties. All data processed in Euroclear Finland is treated confidentially.

## **8. What are your rights in respect to your personal data?**

According to the General Data Protection Regulation, data subjects have the following rights regarding their personal data:

- Right of access to their personal data
- Right to request the controller to rectify incomplete or incorrect personal data
- Right to object to or restrict the processing of personal data and to object to automated decision-making
- Right to request the controller to erase personal data
- Right to transfer personal data to another controller

If the data subject wishes to exercise his or her rights, he or she should contact the Data Protection Officer of Euroclear Finland specified below. If the data subject has given his or her consent for processing and, in the absence of any other legal basis, the data subject is entitled to withdraw consent by contacting the Data Protection Officer of Euroclear Finland. If the data subject believes that his or her personal data are not being processed in accordance with the General Data Protection Regulation, the data subject has the right to file a complaint to the supervisory authority.

## **9. Controller**

Euroclear Finland Oy  
Mailing address: PL 1110, 00101 Helsinki  
Street address: Urho kekkosenkatu 5 c, 00100 Helsinki

## **10. Data Protection Officer**

Should you have questions or concerns regarding your personal data processing or if you want to request further information about this notice, you can contact our Data Protection Officer by e-mailing us at [DPO.Finland@euroclear.eu](mailto:DPO.Finland@euroclear.eu) or writing to our Data Protection Officer by writing to Euroclear Finland Oy, Data protection officer, PO Box 1110, 00101 Helsinki.