

## Privacy Policy

21<sup>st</sup> March 2025

### 1. Controller

Sponda Ltd (business ID: 0866692-3)  
Yrjönkatu 29 C, P.O. box 940, FI-00101 Helsinki  
tel. +358 (0)20 43131

### 2. Contact details for register matters

Sponda Ltd  
Yrjönkatu 29 C, P.O. box 940, FI-00101 Helsinki  
tel. +358 (0)20 43131  
e-mail: [privacy@sponda.fi](mailto:privacy@sponda.fi)

### 3. Name of the register

Customer and marketing register of shopping centres

### 4. Purpose and legal basis of the processing of personal data

The purpose of the processing of personal data is to target the controller's marketing communications that are sent by mail, e-mail, telephone or other means. The purpose of the processing of personal data is to offer the mobile application services provided by the controller's partner (offers, campaigns, fringe benefits, marketing communications, directions to shops and parking services at shopping centres) and to support the use of the mobile application. The available services vary between the shopping centres.

Personal data can also be processed in connection with the controller's direct marketing, opinion and market surveys or other comparable addressed mail, including electronic direct marketing. Personal data may also be processed in order to create classifications, categories or profiled and to create targeted marketing that is more interesting to the data subject.

Personal data is processed in connection with the parking in shopping centre or commercial property that is managed by the controller and/or its group companies.

The controller uses cookies for a variety of purposes. Cookies are small text files stored by the browser to the user's computer or terminal when using the Internet. Firstly, cookies are used for collecting statistical data about use of the websites. The controller also uses cookies for marketing so that it can monitor the use of various different websites. These cookies are used for assembling pro-files of the data subjects' search and browsing behaviour. In addition, the controller uses cookies for monitoring the data subjects' browsing habits and functions. The controller uses the collected data to show content targeted to the data subjects. The cookies on website may be used by and delivered to the data subject by the controller or by third-party web analytics services, such as Google Analytics and Facebook. The data subject may refuse or accept cookies from websites.

The mobile application and the related services are developed continuously. From time to time, the purposes of the processing of personal data may be more limited than what is described in this privacy policy. However, personal data is never processed in broader contexts than what is described in this privacy policy.

The legal basis for the processing of personal data is an agreement, the controller's legitimate interest and/or the data subject's consent. In cases where the legal basis for the processing is a legitimate interest, the interest refers to the controller's needs to market its products and services effectively and develop its services.

The controller may use external service providers to carry out certain processing activities described in this policy. These service providers process personal data on behalf of the controller for the purposes specified in this privacy policy.

## **5. Data content of the register**

The following data can be saved of data subjects:

- Personal information and contact details: first name, last name, e-mail address, gender, address, postal code, telephone number age/year of birth, language and profession.
- Information related to the customer relationship: newsletter subscription type, particular areas of interest, loyal customer status, feedback, contacts, replies to competitions and shopping centre staff membership.
- Information related to the device and connection: device identifier, operating system, IP address and cookies.
- Information related to the use of services: use of the shopping centre parking facilities managed by the controller and/or its group companies, anonymised purchasing behaviour data, data on the use of services, such as browsing and search data, pseudonymised data related to the use of facilities, such as the time spent on the premises, routes and occupancy rate.
- Information collected within the parking in shopping centre or commercial property that is managed by the controller and/or its group companies: telephone number, name and address, e-mail address, payment/transaction details, vehicle registration number, and information connecting to parking occurrence such as location/object, starting and ending time of parking.
- Other data that is collected on the data subject's consent, if any.

## **6. Storage period of personal data**

The data stored in the register may be stored for as long as necessary for the original purpose of the collection and processing, or for as long as required by the law and regulations.

## **7. Regular sources of data**

In general, the personal data collected for the register come directly from the data subject and/or are collected or generated on the basis of the use of the application. However, the data subject's data can be associated with other personal data, within the limits permitted by legislation. Furthermore, data entered by the data subject or collected from the use of the application can be complemented with data that originates from other sources or derived from such sources. More information on these potential sources is below.

We collect personal data from data subjects in connection with the following activities:

- subscribing to the newsletter
- registering in the mobile application
- using the services (for example, vouchers)
- responding to customer surveys
- participating in contests and raffles
- giving feedback online and
- using our services or parking in a shopping centre or commercial property that is operated by the controller and/or its group companies
- using the controller's webpages
- when data subjects contact the controller by other means

In addition, we might in some cases combine the personal data of the data subject with data from the following sources:

- public registers, such as the Population Register Centre or the vehicle register maintained by Traficom.

The prerequisite for receiving data from these registers and systems that are managed by third parties is that the third party on question has the right to disclose this data to use or the data subject has given their consent to the disclosure.

## **8. Regular disclosure of data and recipient categories**

Personal data may be disclosed between the group companies of the controller. Personal data may be disclosed in connection with the sale, transfer or other disposal of a site or business.

Personal data may be disclosed to the controller's and/or its group company's service providers.

Personal data may be disclosed to competent authorities, for example, in order to identify misuse and in order to help them carry out their statutory duties.

## **9. Transfer of data outside the EU or the EEA**

Personal data may be transferred outside the European Union or the European Economic Area in accordance with and within the limits of data protection law.

The controller, the controller's subcontractors or partners may use companies that are located outside the EU or the EEA to assist in the processing of personal data, or they may use workforce or other resources that are located outside the EU or the EEA for processing personal data. It is also possible that a co-operation partner selected by the controller to which the controller decides to transfer data is located outside the European Union or the European Economic Area, for example, in the United States. The legislation of non-EU/EEA countries does not necessarily provide the same level of protection for personal data as the European Union. However, the controller tries to ensure the protection of personal data in these cases by using the safeguards required under data protection law, such as the standard contractual clauses of the European Commission.

## **10. Protection principles of the register**

### Manual material

Any manual materials are stored in a locked room that only authorised persons can access.

### Electronically processed data

The register is stored in electronic form, appropriately protected from outsiders with the help of firewalls and other technical measures. Only designated employees of the controller and representatives of partners have the right to process the data stored in the register.

The aim of the measures described above is to safeguard the confidentiality, availability and integrity of the personal data stored in the register and to permit the exercise of the data subject's rights.

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

Personal data is not used for automatic decision-making that would have legal or other similar effects on data subjects.

## **12. Right to object to the processing of one's personal data**

Where the grounds for the processing of personal data is the legitimate interest of the controller, the data subject has the right to object to the profiling or other processing of any personal data relating to their particular situation.

The data subject may object to the processing of their personal data by submitting a request, as described in section 15 of this privacy policy. In the request, the data subject must specify the particular situation on the basis of which they object to the processing. The controller may refuse to satisfy the request under the criteria set out in legislation.

## **13. Right to object to direct marketing**

The data subject may give their consent or refusal to direct marketing to the controller channel-specifically, and the content or refusal also covers profiling for direct marketing purposes.

## **14. Other rights of the data subject related to the processing of personal data**

### **Right of access to personal data**

The data subject has the right to access their personal data in the register. The access request must be made following the instructions set out in this privacy policy. The right of access can be refused on the grounds provided for in legislation. In principle, exercising the right of access is free of charge.

### **Right to request rectification or erasure of personal data or restriction of processing**

The data subject must, without undue delay and after noticing or becoming aware of the mistake, rectify, erase or complement any data in the register that violates the purpose of the register, is incorrect, unnecessary, incomplete or outdated, if the data subject can do this him- or herself.

If the data subject cannot rectify the data, the rectification request must be submitted as described in section 15 of this privacy policy.

In addition, the data subject has the right to request the controller to restrict the processing of their personal data, for example, while the data subject is waiting for the controller's response to the rectification or erasure request.

#### **Right to move data between systems**

Insofar as the data subject has submitted data to the register that is processed on the basis of the data subject's consent, the data subject has the right to receive such data in a form that is readable by a computer and move them to another controller's system.

#### **Right to lodge a complaint with a supervisory authority**

The data subject has the right to lodge a complaint with a competent supervisory authority of the controller has not complied with applicable data protection regulations in its operations.

#### **Other rights**

If the legal basis for the processing of personal data is the data subject's consent, the data subject is entitled to withdraw their consent by notifying the controller, as described in section 15 of this privacy policy.

### **15. Contacts**

The data subject should contact the controller if they have any questions concerning the processing of personal data and the exercise of their rights. The data subject may exercise this right by sending a request to the controller via e-mail to [privacy@sponda.fi](mailto:privacy@sponda.fi) or by mail to Sponda Ltd, Yrjönkatu 29 C, P.O. Box 940, FI-00101 Helsinki.