

Fermion's Privacy Statement

Fermion ("Fermion") is committed to protecting your privacy in compliance with all applicable regulations and ensuring the security of your personal data. This privacy notice explains how we collect, use, and protect your personal information.

Contact Details

Data Controller: Orion Corporation

Data Protection Officer (DPO): Jyri Wesanko, privacy@orion.fi

Representative: Marko Salo, Marko.Salo@fermion.fi

1. What data do we collect about you?

We collect and process the following types of personal data:

- Fermion's partners' employees' contact data: name, phone number and email address of the partner's employee, company name or other organisation name and employees' position in the company or organisation.

2. How do we use your data?

We process your personal data for the following purposes:

- Customer relationship management: for maintaining customer services with our business partners and to develop, maintain, administer and monitor our client relationships, and otherwise create and develop our operations, products and services.
- Marketing and sales: Marketing purposes, including communicating about our offerings, sales promotion, and other marketing purposes, as well as creating aggregated target groups for marketing. Knowing customers' preferences enables us to target our offers and offer products and services that better meet the needs and expectations of our customers.

Fermion Oy

Registered office and domicile:
Koivu-Mankkaan tie 6 A,
FI-02200 Espoo, Finland
P.O.Box 28, FI-02101 Espoo, Finland

Tel. +358 10 4261
www.fermion.fi

Lääketehtaantie 2,
FI-90660 Oulu, Finland

VAT Reg.
Business Identity Code FI18552129

Orioninkatu 2,
FI-10960 Hanko Pohjoinen, Finland
P.O.Box 50, FI-10901 Hanko, Finland

Pohjola Pankki IBAN: FI72 5000 0120 2210 22 · BIC:OKOYFIHH
Danske Bank IBAN: FI39 8000 1570 9635 62 · BIC:DABAFIHH

3. Legal Basis

We process your data based on the following legal grounds:

Consent of the data subject (EU General Data Protection Regulation Article 6.1.a) / 9.2.a) (special categories of data)

N/A

Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract / (EU General Data Protection Regulation Article 6.1.b)

N/A

Compliance with the controller's legal obligations based on binding law / (EU General Data Protection Regulation Article 6.1.c)

N/A

Legitimate interests of the controller or a third party (the legitimate interest to be identified, such as direct marketing) (EU General Data Protection Regulation Article 6.1.f). • Fermion's partners' employees' contact data for customer relationship management purposes.

- Marketing and sales purposes.

We only process personal data based on our legitimate interests, in case we have deemed, based on the balancing of interest test, that the rights and interests of the data subject will not override our legitimate interest.

4. How do we share your data?

We may share your data with the following recipients:

- Customer relationship management platform service provider Microsoft.
- Other Orion Group companies.
- If ownership or control of Fermion or all or any part of our products, services or assets changes, we may disclose your personal data to any new owner, successor or assignee
- Fermion may disclose information to its authorised distributors and business partners to facilitate the delivery of its products and services. Fermion will not otherwise disclose the collected data for commercial purposes outside the Orion Group.

5. How long do we store your data?

We will retain your personal data for no longer than is necessary for the purposes defined in this Statement.

Personal data processed for customer relationship management purposes will be retained for the duration of the customer relationship but for no longer than fifteen (15) years from the last interaction with our business partner.

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6. What are your rights and options?

You have the right to:

- **Access your data:** You can request information and a copy of your personal data that we have collected and stored in connection with our services / this information notice.
- **Rectify inaccurate data:** In order to keep your data up-to-date and accurate, you can request us to modify your data by contacting us as described in chapter 12.
- **Erase your data:** You can contact us if you think the processing of your personal data is unlawful and your data should be erased. We shall erase or anonymize your personal data without undue delay in accordance with the retention periods detailed in chapter 7 if the data in question is erroneous, unnecessary, incomplete or obsolete as regards the purpose of the processing.
- **Restrict processing:** If you want to restrict our processing of your personal data, please contact us.
- **Object to processing:** If you want to object to the processing of your data for customer relationship management purposes, please contact us. When making the request, please specify the scope of your request.

7. Cookies and Tracking Technologies

We use cookies and similar technologies. For more information on how use cookies, please read our Cookie Policy.

8. Security Measures

We hold your personal data in a combination of secure computer storage facilities and paper-based files.

We have implemented appropriate measures to ensure the level of security around your personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage to it.

We have put in place appropriate technical and organisational measures to ensure a level of security appropriate to the risk of harm that might result from unauthorised or unlawful processing, accidental or unlawful loss, destruction or alteration, unauthorised (or disclosure of) access or damage to your personal data including:

- locks and security systems;
- encryption
- usernames and passwords;
- virus checking;
- auditing procedures and regular data integrity checks; and
- recording of file movements.

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We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They must only process your personal data on our instructions and subject to the access controls listed above. They are also subject to a duty of confidentiality.

We have agreed on security-related measures with the third parties we share your personal data with to ensure that it is treated by those third parties in a way that is consistent with how we safeguard your personal data.

We have also put in place procedures to deal with any suspected personal data breach and will notify you and any applicable supervisory authority where we are legally required to do so.

9. Changes to this Notice

We reserve the right to change this notice from time to time. We will review this notice periodically and update it accordingly if we change our processes materially. We may make changes to this notice when we believe it is reasonable to do so e.g. to comply with legal or regulatory requirements.

10. Contact Us

If you wish to use your rights as a data subject described in chapter 8, or if you have any questions or concerns, please contact us at privacy@orion.fi.

Please note that we will contact you to verify your identity in order to proceed with your request if you wish to use your data subject rights.

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