

DATA PROTECTION NOTICE

The EU's General Data Protection Regulation
(2016/679), articles 13 and 14

Prepared: 23.5.2018

We can update and amend this data protection notice / record of processing activities at any time, and when required by legislation we will inform the data subjects of this.

1. Controller	Orion Corporation Orionintie 1 02200 Espoo Tel. Tel. +358 (0)10 4261
2. Person in charge of register matters and/or contact person	Contact person: Terhi Ormio Orion Corporation Orionintie 1A 02200 Espoo Tel. Tel. +358 (0)10 426 4953 Email: terhi.ormio@orion.fi Contact details of data protection officer: Heidi Arala privacy@orion.fi
3. Name of register	Register of subscribers to Orion Corporation's releases
4. Purpose of processing personal data / the recipients (or categories of recipients) of the personal data / legal basis for processing personal data	<p>The purpose of this register is to allow the user to subscribe to and receive Orion's stock exchange and press releases.</p> <p>We may transfer your data to third parties that assist us in the technical implementation of the purposes of processing, such as the storage of data and server maintenance.</p> <p>Processor: West Corporation</p> <p>The processing of personal data is based on the consent of the data subject.</p>
5. Register's data content	The register contains the following data on the subscribers to the releases: email address
6. Data sources	When subscribing to the releases via the internet, the subscriber provides his/her email address on the form.
7. Transfer of data outside of the EU or European Economic Area	West Corporation is a globally operating company which provides communications services including stock exchange and press release distributing. Personal data in the register is transferred inside the EU and EEA and outside to the following countries: the USA, the UK, India, the Philippines and the rest of the world where the level of legislation may not necessarily fulfil the European Commission's requirements regarding adequate level of data protection.
8. Protection of transmitted personal data	The protection of personal data transferred outside the EU or EEA is based on the processor's Privacy Shield self certification and the use of standard contractual

	<p>clauses adopted by the European Commission. For further information, please get in touch with the controller's contact person.</p>
9. Storage period of personal data	<p>The controller will store the personal data for as long as the data subject subscribes to the releases, until the subscriber cancels his/her subscription.</p>
10. Register's protection principles	<p>West shall be responsible for the register's technical maintenance. West has implemented the following security measures to protect the data:</p> <ul style="list-style-type: none"> - encryption of personal data at rest and in transit; - technical security measures, such as intrusion detection, firewalls and monitoring; - continuous tests and checking of security measures; - redundancy and backup systems; - processes for restoring usability and access to personal data during fault situations; - password parameters, data centre security measures, identity and authority to use administration and personal data access restrictions; - Inspection and testing of West's internal safety processes and the data safety processes of West's subcontractors; - response plan for data security exceptions and violations; and - data collection on data security exceptions and violations. <p>West has a special data security team that provides global business support.</p>
11. Right to withdraw consent / right to object to processing	<p>If the processing of personal data is based on the consent of the data subject, the data subject has the right to withdraw consent.</p> <p>The request to withdraw consent or object to processing must be presented to the person in charge of the controller's register in a document that has been personally signed or verified in a corresponding way, and by providing proof of identity by attaching a copy of a valid official identity card to this request, which must be presented to the representative nominated by the controller in section 2. Data processing that has taken place before the withdrawal of consent shall not become unlawful, even if consent is withdrawn.</p>
12. Right of inspection, rectification and erasure of data, and restriction of processing	<p>The data subject has the right to inspect for him/herself what personal data has been stored in this register or to make sure that the register does not contain any of his/her personal data. The data subject may personally withdraw consent, or rectify or erase personal data from the register by visiting the address http://cws.huginonline.com/O/3079/sub_eng_new.html</p> <p>Under certain conditions, the controller must restrict the processing of personal data upon the data subject's request.</p> <p>If the controller does not approve the data subject's request to restrict the data, the controller must provide a written certificate of this. The certificate must also mention the reasons why the request has not been approved.</p> <p>The data subject may forward the matter for processing by the data protection officer.</p>

	<p>The above-mentioned requests concerning the rights of the data subject must be presented to the representative in section 2 nominated by the controller (see the contact details above).</p>
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