

INFORMATION NOTICE

EU General Data Protection Regulation (2016/679), Articles 13 and 14

Date of drafting: 10th of August, 2018

We may update or revise this Information Notice at any time, with any notice to you as may be required under applicable law.

1. Controller / Company	Orion Corporation (Company Identification Number: FI1999212-6) Orionintie 1 A, P.O. Box 65 02101 Espoo Finland Tel. 010 4261
2. The person in charge / contact person	Jari Kaunisto Director, Sales & Marketing Contract Manufacturing Orion Oy Orionintie 1 A, P.O. Box 65 02101 Espoo Finland Tel. +358 50 966 3543 e-mail: jari.kaunisto@orion.fi Contact details of the Data Protection Officer: Heidi Arala e-mail: privacy@orion.fi
3. Name of the data file	Customer register
4. The purpose for processing the personal data / the purpose for the use of the file / recipients (or categories of recipients) of personal data / the legal basis for processing the personal data	<p>Tracking and planning sales and marketing activities with individuals working at customer companies and prospective customer companies.</p> <p>The company will not disclose the collected data for commercial purposes to third parties. Company uses an internet browser-based customer relationship management platform, technically maintained by an outside service provider for which purposes personal data is disclosed to the service provider who is bound by a confidentiality agreement to follow all commitments given by Orion.</p> <p>Orion employees with need for accessing and processing the personal data in the file have such data containing customer contact information stored on their computer or in an internal network area and this data is password protected.</p> <p>The legal basis for processing of the personal data is legitimate interests of the controller/ maintenance and development of the client relationship.</p>
5. Content of the file	<p>Orion's global current and prospective customers. The following details are collected of each individual</p> <ul style="list-style-type: none">• First and last name• Gender• Telephone numbers• Email addresses• Title• Job role

	<ul style="list-style-type: none"> • Name of employer (past and current) • Address and phone number of employer • Interaction activity history • Notes from communication (emails, calls, face-to-face meetings, business deals)
--	--

6. Regular sources of information	Information is collected by Orion personnel from public sources such as the internet (social media sites such as LinkedIn) or from the individual him/herself.
7. Retention period of the personal data	The data files are periodically updated to include only data which is relevant for the purpose of processing.
8. The principles how the data file is secured	<p>A. Manual data file The data file does not contain manually processed data.</p> <p>B. Electronic information</p> <p>The data file is located on a server in a private hosting environment. The application is used via a secure https connection and only with a personal username and password. The server is accessible with a personal username and password. The information is accessible only by such company employees who need the information based on their role. Only an authorized user of the data file can create new users and maintain user information.</p> <p>Only authorized employees can access the server via a VPN connection for maintenance of the system. Backups are run on a daily basis and the backups are maintained for 4 weeks.</p>
9. Right of access	<p>The data subject shall have the right of access, after having supplied sufficient search criteria, to the data on himself/herself in the personal data file, or to a notice that the file contains no such data. Orion shall at the same time provide the data subject with information of the regular sources of data in the file, on the uses for the data in the file and the regular destinations of disclosed data.</p> <p>The data subject who wishes to have access to the data on himself/herself, as referred to above, shall make a request to this effect to the person in charge at Orion Corporation by a personally signed or otherwise comparably verified document and by verifying his or her identity by attaching a copy of an official identification document.</p> <p>Requests for the right of access shall be made by contacting the representative of Orion Corporation named under section 2. hereof.</p>
10. Right to object to processing	<p>In case the legal basis for processing the personal data is the legitimate interests of the controller, the data subject has the right to object to processing on grounds relating to his or her particular situation. The data subject always has the right to object to processing of the personal data for direct marketing purposes.</p> <p>In case the data subject wishes to use its above-mentioned rights, he or she shall make a request to this effect to the person in charge at Orion by a personally signed or otherwise comparably verified document in writing to the representative of Orion named under section 2. hereinabove.</p>

11. Rectification, restriction of processing and erasure	<p>Orion shall, on its own initiative or at the request of the registered individual, without undue delay rectify, erase or supplement personal data contained in its personal data file if it is erroneous, unnecessary, incomplete or obsolete as regards the purpose of the processing. Orion shall also prevent the dissemination of such data, if this could compromise the protection of the privacy of the individual or his/her rights.</p> <p>Under specific circumstances, the data subject has the right to obtain from Orion restriction of processing of his or her personal data.</p> <p>If Orion refuses the request of the registered individual of the rectification of an error, a written certificate to this effect shall be issued. The certificate shall also mention the reasons for the refusal. In this event, the individual may bring the matter to the attention of the Data Protection Ombudsman.</p> <p>Orion shall notify the rectification to the recipients to whom the data have been disclosed and to the source of the erroneous personal data. However, there is no duty of notification if this is impossible or unreasonably difficult.</p> <p>Requests for rectification shall be made by contacting the representative of Orion named under section 2. hereof.</p>
---	---