

## PRIVACY STATEMENT FOR CUSTOMERS

This privacy statement (hereinafter 'Statement') describes how RTS Group processes personal data of customers and potential customers. This Privacy Statement has been drafted in accordance with the requirements set by the EU General Data Protection Regulation (2016/67) (GDPR). RTS Group is committed to complying with the obligations of the GDPR and other data protection-related legislation. For the purposes of this Statement, the term 'person' refers to all natural persons whose personal data are in the customer data file of RTS Group.

When RTS Group offers its services, it has two roles within the framework of the GDPR:

### a) RTS Group as a Data Controller in relation to its customers

RTS Group acts as the Data Controller as intended by the GDPR when it processes customers' personal data for its own purposes in a way that this personal data forms the customer data file of RTS Group.

### b) RTS Group as a Data processor in relation to the personal data that the customer has added to RTS Group's service

RTS Group acts as the Data processor as intended by the GDPR when it processes personal data on behalf of the customer, i.e. personal data that the customer has added to the service of RTS Group. In this processing situation, the customer acts as the Data Controller as intended by the GDPR.

The processing operations of RTS Group regarding situations where RTS Group acts as the Data Processor are described in section 8 of this Privacy Statement.

## 1. DATA CONTROLLER AND DATA PROTECTION OFFICER

Data controllers: RTS Group, including

- Rakennustieto Oy, VAT-number: 0113188-9
- Building Information Foundation RTS sr [Rakennustietosäätiö RTS sr], VAT-number: 0201937-0
- ET INFOkeskuse AS, VAT-number: 10067459 (Estonia)
- Building Information Model Ltd. [Rakennustietomalli Oy], VAT-number: 3178368-5

hereinafter 'RTS Group'

Address Malminkatu 16 A, 00100 HELSINKI  
Telephone +358 45 4900 747

Data Protection Officer:

Kaarina Limingoja, deputy: Marjut Jensén

Email [tietosuojavastaava@rakennustieto.fi](mailto:tietosuojavastaava@rakennustieto.fi)

## 2. PURPOSE AND LEGAL BASIS OF PERSONAL DATA PROCESSING

Personal data are processed to create and manage the customer relationships between persons and RTS Group. We use personal data for purposes such as the following:

- obtaining and managing customer relationships;
- informing the customer about the use of the service;
- delivering, processing and archiving orders;

- developing the operations and services of RTS Group and of the third parties providing services to RTS Group;
- improving customer experience;
- analytics and statistical purposes;
- generating more personalised, targeted content and marketing;
- sending newsletters;
- managing events, campaigns and competitions;
- implementing marketing bans, as defined in legislation;
- preventing abuse; and
- providing better customer service.

Data are processed either based on the data subject's expressed consent, the exercise of the data controller's legitimate interests or statutory obligations, or for the preparation or implementation of an agreement between the customer and RTS Group.

In situations where the processing is based on a legitimate interest, RTS Group has performed a balance test and assessed that the interests or fundamental rights and freedoms of a person requiring the protection of personal data do not override the legitimate interest of RTS Group. A legitimate interest may arise if there is an appropriate relationship between the person or the organisation represented by the person and RTS Group, which may arise, for example, on the basis of a customer agreement.

The interests and fundamental rights and freedoms of persons are respected, no personal data belonging to special categories of personal data are processed, and the processing activities are predictable for persons. Personal data are protected against unauthorised access or processing by the safeguards described in section 5.

### **3. COLLECTING PERSONAL DATA AND CATEGORIES OF PERSONAL DATA PROCESSED**

Personal data may be collected in different ways; as a general rule, however, we collect personal data directly from persons themselves or from companies with which customer agreements have been entered into.

The processing purposes covered by this Statement require that the personal data we collect and process is limited to the following:

- contact details and basic information, such as name, email address, telephone number, IP address;
- the person's employer or other organisation and its contact details, such as address and telephone number;
- information on the person's role in the organisation;
- information on the customer relationship, such as offers, agreements, feedback.

### **4. DISCLOSURES AND TRANSFERS OF PERSONAL DATA TO THIRD PARTIES**

We may disclose personal data within RTS Group. Another company or foundation belonging to RTS Group may also process your personal data on our behalf. This processing is based on our legitimate interest to transfer personal data for intra-group administrative purposes, such as for reporting purposes, and to conduct our business efficiently, such as using centralised payment systems. We may disclose some

necessary data to third parties that we use as service providers or subcontractors, for example, to guarantee delivery or for marketing, event organisation and customer relationship management.

We use trusted contractual partners whose contracts include the requirements imposed by the EU GDPR and other legislation. We also use customer information with third parties for analytics and personalisation purposes. We use purchase behaviour and browsing data together with partners, so that we can provide you with more relevant products and offers.

If necessary, we also disclose data to public authorities. We always inform the customer of information requests if this is permitted by law.

We transmit data to the following third parties:

- analytics and statistics partners;
- partners in organising events;
- parties supplying customer relationship management functionalities;
- email marketing partners if the customer has opted in for a newsletter or if the newsletter can under law be delivered without consent;
- transport company if the delivery method chosen is delivery to a pick-up point, the nearest post office or the customer's address;
- payment processor when card payment is used;
- invoice operator;
- product supplier when an order is made for an electronic licence or a direct delivery product;
- debt collection company if an invoice falls due and is transferred to a collection company;
- other necessary service providers or subcontractors.

Third parties include the following entities and their subcontractors:

- Facebook Inc.
- ActiveCampaign Inc.
- Google LLC
- LinkedIn Corporation
- Microsoft Corporation
- Zapier Inc.

Third parties and their subcontractors may transfer personal data even outside the EU or the European Economic Area (EEA). In these situations, the applicable legislation (such as GDPR) and its requirements, such as the standard contractual clauses (SCC) adopted by the European Commission, are complied with.

We use Google Analytics to analyse the use of our website, popular products, trends and sales. Google LLC processes personal data in accordance with its privacy policy: <https://policies.google.com/privacy?hl=fi>.

Whenever data are transferred and processed, RTS Group will ensure a high level of data security and protection in accordance with GDPR. We do not process the personal data processed in accordance with this Statement outside the EU or the EEA.

## **5. DATA FILE PROTECTION**

We take appropriate measures (including physical, technical and administrative measures) to protect personal data from loss, destruction, misuse and unauthorised access or disclosure. In each case, access to personal data is restricted to those persons who need the data for the performance of their duties. Access to information systems containing personal data requires a user-specific username and password. Written material is stored in locked cabinets, and archived material is stored in filing cabinets.

RTS Group stores customer information within the European Union. Data centres, the technical security of the store systems and the data security of all processes are of high quality. Servers are protected against data breaches and denial-of-service attacks. Everyone who handles personal data has a duty of confidentiality with regard to all personal data.

Note that even appropriate measures cannot prevent all possible security breaches. In the event of a personal data breach, we will notify you in accordance with applicable law.

## **6. STORAGE, ARCHIVING AND DESTRUCTION OF PERSONAL DATA**

Personal data are only stored as long as is necessary for the purposes defined in this Statement. Personal data will be deleted when their storage is no longer necessary for the implementation of the law or the rights or obligations of either party.

## **7. RIGHTS OF THE DATA SUBJECT**

You have the right of access to personal data concerning you and the right to obtain confirmation as to whether or not personal data concerning you are being processed. You may also request rectification, updating or deletion of your personal data at any time. Please note, however, that personal data necessary for the purposes specified in this Statement or for which the law requires storage cannot be deleted.

You have the right to object to or restrict the processing of your personal data to the extent required by applicable law. Restricting processing means that personal data, with the exception of storage, may only be processed with your consent, to establish, exercise or defend a legal claim, or to protect the rights of another person, or for reasons of important public interest. You have the right to request restriction of processing, for example, if you dispute the accuracy of your personal data. In this case, we will restrict the processing for the period during which we can verify the data.

You may object to the processing of your personal data on grounds relating to your particular situation when the data are processed for the performance of a task of general interest or for the performance of RTS Group's or third parties' legitimate interests. At that time, we may process your personal data only if there is a significant and justifiable reason for the processing that overrides your interests, rights and freedoms, or if the processing is necessary for the establishment, exercise or defence of a legal claim.

In certain cases, you have the right to transfer the personal data you have provided to us from one system to another, i.e. the right to receive your personal data in a structured, commonly used, machine-readable format and transmit your personal data to another controller, in accordance with applicable law.

When we process your personal data on the basis of consent, you have the right to withdraw your consent at any time. We will not process the personal data thereafter unless there is another legal basis for processing. However, the withdrawal of consent will not affect the lawfulness of the processing carried out before the withdrawal.

You can exercise your rights by sending a request to [tietosuojavastaava@rakennustieto.fi](mailto:tietosuojavastaava@rakennustieto.fi). If you feel that the processing of your personal data is not appropriate, you have the right to lodge a complaint with the

national supervisory authority, the office of the Data Protection Ombudsman; contact details here: <https://tietosuoja.fi/etusivu>.

## **8. RTS GROUP AS A DATA PROCESSOR FOR PERSONAL DATA STORED BY THE CUSTOMER TO THE SERVICE OF RTS GROUP**

As the Data Controller, the customer decides the purposes and means of processing the personal data they have added to the service of RTS Group. The customer is obliged to ensure that there is a legal basis for the processing of personal data in accordance with the GDPR. RTS Group does not process personal data added by the customer for any other reason or in any other way than based on the instructions of the customer.

The customer can add the following information of the desired persons to the service of RTS Group:

- contact information and basic information, e.g. name, email address, phone number, IP address;
- the person's employer or other organization;
- information about the person's role in the organization.

RTS Group itself collects personal data about persons added by the customer in the following instances:

- user data regarding a person when they themselves are in contact with RTS Group;
- information about contacting the customer service.

RTS Group processes the personal data of the persons added to the service by the customer only as long as RTS Group and the customer have a valid agreement on the use of services. At the end of the agreement, RTS Group will, based on the customer's choice, either permanently delete or return all personal data to the customer and, in addition, delete existing copies, except for the situation where the law requires retention of the personal data for a specified period after the end of the agreement.

The rights and obligations of the Data Controller and Data Processor are stipulated in more detail in RTS Group's Data Protection Appendix, which is an essential and inseparable part of the general terms and conditions of RTS Group. An up-to-date version of the Data Protection Appendix is available at <https://www.rakennustieto.fi/yleiset-sopimusehdot>.

## **9. USE OF AUTOMATED DECISION-MAKING AND PROFILING**

The processing of personal data by RTS Group covered by this Statement does not currently utilise automated decision-making, such as profiling.

## **10. USE OF COOKIES ON RTS GROUP'S WEBSITES**

RTS Group uses cookies and other similar technology, such as the browser's local storage. Cookies are small text files exchanged between the user's browser and a server. Cookies and other identifiers are valid for a specified period, after which the browser will remove the identifier. We use this technology to enable functions, personalise content as well as for analytics and targeted marketing.

Functional cookies and local storage are used for purposes such as identifying customers, maintaining the logged-in state, evaluating delivery times and performing shopping cart functions. For these purposes, the use of cookies and local storage is required and users must consent to it. Functional cookies and local storage variables placed by the server are stored in the user's browser for a period ranging from 15 minutes to 24 months, unless they are deleted through the browser settings. When the user re-visits the website, cookies and local storage variables are placed on the device again if allowed by the browser.

We treat data as personal to the extent that the identifier includes data that identifies the customer, such as an IP address. Identifiers that have been linked to the customer in some way are also treated as personal data. Identifiers used for analytics and targeted marketing are valid from 30 seconds to 24 months.

We use Google Analytics to analyse the use of our website, popular products, trends and sales. Read more about how Google Analytics processes data: <https://policies.google.com/technologies/partner-sites>. Users can opt out of the identifiers used by our analytics and marketing partners by turning the 'Do Not Track' function on in their browser and setting the browser to reject third-party cookies.

## **11. CHANGES TO THE STATEMENT**

We have the right to amend this Statement. Registered customers will be informed of any significant changes to the privacy statement when terms and conditions are updated. The latest version of this Statement can be found at <https://rakennustieto.fi/tietosuojaseloste>.

Updated: 8.5.2024