

AARNIK

ADVISORY & ACCOUNTING

PRIVACY STATEMENT FOR CUSTOMERS AND STAKEHOLDERS

In accordance with the EU General Data Protection Regulation
(2016/679 | General Data Protection Regulation)

Aarnik Advisory & Accounting Ltd
FI3553902-2

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Privacy Statement for Customers and Stakeholders

This Privacy Statement for Customers and Stakeholders (hereinafter referred to as the "Privacy Statement for Customers and Stakeholders" or "Privacy Policy") describes how Aarnik Advisory & Accounting Oy (hereinafter referred to as "Aarnik Advisory & Accounting Oy", "Aarnik" or "we") collects and processes personal data in the following contexts:

- Marketing and sales of services
- Prospects and their management
- Customer contracts and customer management
- Production and use of services
- Procurement of services, supplier agreements and supplier management
- cooperation projects and stakeholder management

Please read this Privacy Policy and Aarnik's General Privacy Policy carefully before You start using our services or doing business with us.

Controller

Aarnik Advisory & Accounting Oy is responsible for ensuring that Your personal data is processed in accordance with this Privacy Policy and applicable data protection laws.

Contact details of the controller:
Aarnik Advisory & Accounting Ltd
Company ID: 3553902-2
Address: Rovaniemi, Finland
Phone number: +35850 505 7917
Email: sini.peltonen@aarnik.fi

Collection of personal data

We may collect personal information in a variety of ways. Primarily, we collect, and process personal data as follows:

- You have provided the information to us when You communicate or do business with us, for example in connection with the conclusion of a contract or the Know Your Customer (KYC) process, or when You purchase our services, provide services to us, participate in our marketing or social media campaign or another event organized by us.
- The information is obtained from public sources or through third parties in accordance with applicable legislation, such as information obtained from a company that You represent or with which You otherwise have an appropriate connection, from the Trade Register or other official registers, the Business Information System or other similar public databases, such as lists of economic sanctions or asset freezes.
- We may combine personal data, such as information obtained from public sources, and information obtained in connection with different transactions, such as entering a contract, providing services or events.

You are not obliged to provide us with Your personal information, but there may be consequences for refusing to do so. Refusing will make it difficult or prevent us from doing business with You and/or the company You represent or from taking the actions You have requested.

Personal data processed

We process personal data according to the situation. The type and scope of personal data will always be limited to the information necessary for the processing purpose in question. As an accounting firm, we process the following personal data:

- Basic information, such as name, job title, Your relationship with the company You represent, contact information, nationality and language of service
- Information related to customer due diligence required by law, such as identification information such as personal identity code, eligibility for representation, beneficiary information, information on political influence, sanctions list information
- Other information related to the customer relationship, such as service information, communication information, access IDs for shared programs, information necessary for billing and debt collection, marketing and interaction information, information generated in connection with events organized by us
- Shareholder and associate information required for the administration of a limited liability company or housing company
- Other case-by-case information

Purpose and legal basis for processing

We only collect, process and use personal data that is necessary for our business for commercial purposes, including processing personal data to anonymise it. In other words, we process personal data to perform or enter a contract with You or the company You represent.

Provision and production of services, as well as customer relationship management

We process personal data to provide and deliver a service to You or the company You represent. To do so, we maintain and manage the customer relationship with You or between the company You represent and us. In this case, the processing of personal data is based on a contract between You and/or the company You represent and us, or on our legitimate interest in managing our customer relationships.

Procurement of services

We process personal data in connection with the procurement of services and cooperation projects to manage the business relationship between us and You or the company You represent, and related transactions. In these cases, the processing of personal data is based on a contract between us and You, or the company You represent, or on our legitimate interest to obtain the services necessary for the operation of our business and to cooperate with and manage our relationships with selected partners.

Marketing and communications

We process personal data for marketing purposes and to inform You about our new services. We may also process Your personal data for marketing research and customer surveys. In this case, the processing of personal data is based on Our legitimate interest to provide information as part of the

Service and to market Our services to You. You have the right to object to the processing of Your personal data for direct marketing purposes at any time.

Enforcing Rights and Complying with Laws

We may process Your personal data to comply with our legal obligations, for example, in relation to: accounting or to carry out requests for information based on the law of the authorities. We may also process Your personal data to investigate misconduct, to protect, defend or enforce our rights in official proceedings or in the event of disputes, for example, to demonstrate compliance with contractual obligations or to respond to legal claims. In these situations, the processing is based on our legitimate interest in being able to demonstrate the compliance of our operations and to adequately protect our rights. Legislation on the prevention of money laundering and terrorist financing obliges us to identify customers, find out information about their business and ownership of the client company, for example, we must identify politically exposed persons or persons subject to sanctions and the beneficial owners of the client company.

Other purposes for which You have consented

We may also collect and process personal data for other purposes. In this case, we have asked for Your consent to the processing.

Changes to this Statement

We may update the Privacy Statement for Customers and Stakeholders, if necessary, if it is necessary to describe the changed practices in the processing of personal data. The latest version is always available on our website.

This Privacy Statement for Customers and Stakeholders was prepared on 2.9.2025 and updated on 16.9.2025.

Contact details

If You have any questions about the Privacy Policy for Customers and Stakeholders or the personal data we process, You can send an email to sini.peltonen@aarnik.fi.