

AARNIK

ADVISORY & ACCOUNTING

GDPR GENERAL PRIVACY STATEMENT

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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General Privacy Statement

This General Privacy Statement (hereinafter "General Privacy Statement" or "Privacy Policy") applies to Aarnik Advisory & Accounting Oy (hereinafter "Aarnik Advisory & Accounting Oy", "Aarnik" or "we"). The Privacy policy describes how personal data is collected and processed, to whom the data is disclosed, how long it is stored, and what your rights are in relation to your personal data.

Personal data means information that can be directly or indirectly linked to You. Information referring to a person representing or acting on behalf of a company is also personal data. Information about a company that does not in any way refer to a natural person is not personal data.

We process personal data in different situations and in relation to several stakeholders, so we have prepared an additional statement to supplement the General Privacy Statement and describe the processing in individual situations in more detail. You can also find the additional Privacy Statement for customers and stakeholders on our Privacy policy page.

At the end of the General Privacy Statement, you will find information for contacting us about data protection.

Collection of personal data

We may collect personal information in a number of ways: You may provide information yourself when you interact with us, or information may be collected when you use our services. We may also derive information about you based on the personal data we hold. Your personal data may also be obtained from external third parties, such as public sources. We may combine personal data concerning You that We have received from public sources and various business connections, for example, in connection with the provision of services or marketing communications.

You are not obliged to provide us with your personal information, but there may be consequences for refusing to do so, depending on the circumstances. For example, in some situations, we may not be able to provide our service or act on your request.

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:

- Name and contact information
- Personal identity code and the personal identity number or other identifier given to the person by the customer
- Other basic information about the person, such as date of birth, gender, nationality and title
- Information on the employment relationship required for payroll calculation, such as the start and end dates of the employment relationship, holidays and absences
- Information required for payroll calculation, such as withholding tax
- Specific personal data referred to in the GDPR required for payroll calculation, such as: sickness absences and thus health data and trade union membership data
- Wages, pensions and taxation data generated on the basis of payroll calculation and other similar data Information

- Information required for invoicing and debt collection
- Shareholder and associate information required for the administration of a limited liability company or housing company
- Information required by HR management on the training and qualifications completed by the person
- Other separately specified data in writing that we process on behalf of the customer

We may also process personal data for statistical purposes, in which case the data is aggregated so that it is not possible to identify a natural person from the end result. The resulting statistics are not personal data, because they cannot be linked to an individual person.

Purpose and legal basis for processing

We only collect, process and use personal data that is necessary for our business and relevant operations, including processing personal data to anonymise it. In other words, we process personal data in order to perform or enter into a contract with you or the company you represent.

We only process personal data for legitimate and specified purposes and do not process data in a way that is incompatible with these purposes. There is always a legal basis for processing personal data, which we will tell you. We may process personal data in order to fulfil our legal obligations, for example, in relation to accounting, to carry out statutory sanctions audits or to carry out official inspections (e.g. Tax Administration) as required by law. You may also have given your consent to the processing of your personal data for one or more specified purposes.

Personal data may also be processed for the purposes of our legitimate interests or those pursued by a third party, provided that your fundamental rights are not overridden by such interest. For example, we combine personal data collected from different sources and process personal data to provide services, develop our operations or prepare internal reports for the management of our business. In such cases, the processing of personal data is based on our legitimate interest to ensure the adequate security of our services, both to obtain the necessary information to understand our customers and develop our operations, as well as to manage our business.

Sharing and Disclosure of Personal Information

We may share personal data within the scope of applicable law for the purposes set out in the Privacy Policy, including developing our services and marketing our services. Personal data may be transferred for internal administrative purposes, such as as as reporting on the company's operations or to utilize centralized solutions, for example, in the use of systems and database maintenance. The sharing of personal data is based on our legitimate interest to operate and develop our business and manage our customer relationships, as well as to inform our customers about our services. Aarnik Advisory & Accounting Oy does not sell or rent personal data to other parties.

We may disclose personal data to third parties in the following cases:

- To the extent required or permitted by law, for example, to comply with a request from a competent authority or in connection with legal proceedings.
- When our service provider processes personal data on our behalf and in accordance with our instructions, or when we process personal data for the purposes jointly defined with our partner in accordance with the Privacy Policy. In this case, we will determine the processing of your personal data and we will be responsible for it.

- When We procure services from Our partners as part of internal processes, to conduct or support Our business or to provide Services to You. Our partners can continue to use the personal data they process in connection with the provision of the service independently for their own purposes. We strive to ensure that further processing does not conflict with the original purpose for which the personal data was used. In these cases, our partner is responsible for the lawfulness of the processing of personal data.
- When we are involved in a corporate restructuring or the sale of a business or part of it.
- When we believe disclosure is necessary to enforce or protect our rights, such as to respond to legal claims, protect your safety or the safety of others, investigate misconduct or respond to a request from a public authority.
- When there is a legitimate interest in disclosing the data. In such a case, you will always be informed of the disclosure of your data.
- When you have given your consent to the disclosure of your data. In this case, the information is disclosed in accordance with consent.

Transfer of data outside the EU or EEA

The personal data we process is mainly located in the EU or the European Economic Area.

However, we may transfer personal data outside the EU or EEA if our potential service provider operates in whole or in part in a third country. Personal data may also be transferred to third countries in situations where the partner is required to do so by mandatory legislation outside the EU that is binding on the partner. If data is transferred outside the EU or EEA, we aim to ensure that the country is a country with an adequate level of data protection as referred to by the European Commission, that the transferee is Data Privacy Framework (DPF) certified, or that the transfer takes place using standard contractual clauses published by the European Commission.

Retention of personal data

Personal data will only be stored for as long as necessary to carry out the processing purpose, including to comply with legal, accounting or reporting requirements as described in this Privacy Policy.

Personal data processed on the basis of a contractual relationship with you or the company you represent is usually stored for the period necessary for the contractual relationship or the provision of services. When the customer relationship or the provision of the service ends, personal data is stored to the extent necessary to safeguard our legitimate interests, for example, to be able to respond to claims for compensation or actions in accordance with the statute of limitations.

If personal data is processed for the fulfilment of legal obligations, it will be stored in accordance with the requirements of the law. The obligation to store personal data is laid down in legislation on accounting and money laundering, for example.

The storage period of personal data processed on the basis of consent is determined by the purpose of processing.

Your rights

Your rights and choices regarding personal data depend on the situation in question and the purpose of the processing:

- Right of access: You have the right to obtain confirmation as to whether your data is being processed, and if so, to have access to the data. This will provide you with information on how we process your personal data and a copy of your data stored in personal data registers.
- Right to rectification: You have the right to have inaccurate data rectified and, in some cases, to have incomplete personal data completed.
- Right to object to processing: You have the right to object to the processing of your personal data where it is based on the legitimate interest of Aarnik or a third party, where such legitimate interest is overridden by your personal situation. We may reject a request if the processing is necessary for the exercise of mandatory and legal rights. You can object to the processing of your personal data for direct marketing purposes and the related profiling at any time.
- Right to data portability: You have the right to receive the personal data that you have provided to us for processing based on consent or the performance of a contract. In such a case, we will disclose the information to You or a third party of Your choice in a structured, commonly used and machine-readable format.
- Right to be forgotten: You can ask us to delete your personal data if there is no valid reason for continuing to process it, for example, if you feel that the processing of your personal data is unnecessary for the purposes described above, or if you want to withdraw the consent you have given.
- Right to restriction of processing: You have the right, under certain circumstances, to request Aarnik to restrict the processing of your personal data, for example, while verifying the accuracy of the personal data.
- Right to give and withdraw consent: If the processing of personal data is based on your consent, you have the right to withdraw your consent at any time.

We may need to ask You for more detailed information in order to verify Your identity and ensure that You are entitled to exercise these rights.

You can exercise your rights by sending the above request to sini.peltonen@aarnik.fi. If you believe that the processing of your personal data is inadequate, you can contact the Data Protection Ombudsman.

Security of personal data

We take appropriate measures (including physical, technical, and managerial measures) to protect personal information from loss, destruction, misuse, and unauthorized access or disclosure. For example, we limit access to personal data to only authorized employees and service providers who need this information in their work. They only process personal data in accordance with our instructions and under the obligation of confidentiality. However, please note that even appropriate measures cannot prevent all possible data breaches. In the event of a data breach, we will notify You in accordance with applicable legislation: The data subject will be notified by the data controller if the data breach is likely to cause a high risk to their rights and freedoms. The notification describes the nature of the data breach and the measures taken as required by the GDPR.

Staff

Our entire staff is committed to ensuring the realisation of the rights of the data subjects we process under the GDPR. Data protection and information security issues are a key part of Aarnik's operating principles, the up-to-date legislation and regulations of which are discussed, for example, through training. An operating model has been developed as part of internal control in case of possible material information security-related deviations.

Subcontractors

An agreement is drawn up with our subcontractors on the confidentiality of business and professional secrets.

Identification of the client and disclosure of data

The customer's representatives are identified before the customer relationship begins, and the identification information is stored as required by the Anti-Money Laundering Act.

Aarnik does not use portable data carriers to perform its duties or to process the information to be protected.

Access management and password policy

User rights are managed centrally and system-by-system. All employees have personal user IDs to the systems and access to confidential information takes place always with a password. When the system allows, multi-factor authentication methods are used. Personal user IDs are used to ensure appropriate log data on the Changes.

Outsourced ICT services and software

Aarnik uses external processors who assist Aarnik or produce some of our services. Written service agreements have been drawn up with external parties. A list of processors is available sini.peltonen@aarnik.fi.

Computer and mobile device security

The workstations and terminal devices in use have been registered and documented appropriately. The devices have centralized antivirus and firewall applications, which are monitored for up-to-dateness. The right of staff to install software on workstations has been restricted. Connections to electronic systems are implemented through encrypted connections.

Changes to this Statement

We may update the Privacy Statement if necessary to reflect changes in the processing of personal data. The latest version is always available on our website.

This General Privacy Statement was prepared on 2.9.2025 and updated on 16.9.2025.

Contact details

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