

Consumer Service Register - Privacy Policy and Information Document

Company / controller

Orkla Foods Finland Oy
Business ID: 0640964-0
Rydöntie 14
PL 683
20361 Turku

Orkla Confectionery & Snacks Finland Ab
Business ID: 0205117-8
Sundsvägen 420
22410 Godby
Åland

Contact person in matters related to the register

Johanna Paavola
tietosuoja@orkla.fi

Name of the register

The consumer service register of Orkla Foods Finland Oy and Orkla Confectionery & Snacks Finland Ab

What is the purpose and legal basis for processing the personal data recorded in the consumer service register by Orkla Foods Finland Oy and Orkla Confectionery & Snacks Finland Ab?

The purpose of the consumer service register is communication with customers who send consumer feedback, planning and developing services and products, compilation of statistics and research and responding to possible complaints and demands.

Consumer services are offered on the website of Orkla Foods Finland Oy and Orkla Confectionery & Snacks Finland Ab, in which information is collected inter alia for the purpose of developing the products. Orkla Foods Finland Oy and Orkla Confectionery & Snacks Finland Ab are using cookies on their websites and online services, only if you separately enable them in your browser. The purpose of the cookies on our websites is to allow the visitors of our websites and services access to different features, to analyze the performance of the website and services and to record preferences in order to better target the marketing to a visitor and to different groups of users. You have the possibility to refuse to accept cookies and to block all cookies on your browser or device. For more information on how Orkla Foods Oy and Orkla Confectionery & Snacks Finland Ab are using cookies and about the custom related to the usage of cookies, see <https://www.orkla.com/legal/fi/evasteiden-ja-henkilotietojen-kaytto/>.

Communication with consumers can also happen on our sites in the social media, which are built in the platforms maintained by third-party service providers or on our communication platforms (Facebook, Instagram, Youtube, Snapchat). Data is also collected from these platforms based on your communication and by the usage of cookies and analytics tracking systems e.g. for developing our products and services, optimizing our pages so that we can provide suitable marketing material for you. Cookies are used only if you separately enable them in your browser.

The provision of personal data is not a statutory or contractual requirement nor a requirement necessary for entering a contract, and you are not obliged to provide the personal data. However, responding to your inquiries, complaints and demands provides that you provide personal data regarding such inquiries, complaints and demands.

The collected data is not used for electronic direct marketing or automated decision-making or profiling with the exception of the situation where you have given your prior consent for using cookies or using your personal data in particular on the purpose of electronic direct marketing.

The legal basis for processing personal data is

- the person's explicit prior consent and/or
- the legitimate interest of the controller. The controller has lawful and reasoned interest to process and respond to the consumer feedback which the controller has received and develop its business based on the consumer feedback. We may also share your personal data with the companies belonging to the same group of companies with the controller ("Orkla Group") for the purpose of developing the business. The data subject is always entitled to object to processing of his personal data, so the processing is not contrary to the fundamental rights of the data subject.

What personal data is stored in the register?

The following data is stored in the consumer service register:

- name
- e-mail
- address
- phone number
- feedback / developmental suggestions / complaint with its appendices (these may also include feedback giver's information on health which, as particularly sensitive data, will be kept separate from other data and kept and processed by exercising special care)

Based on your comments or replies in our sites in the social media, we may also collect the following data:

- Your Facebook-profile name and -contact details
- communication and other contents you shared with us

In case you have accepted the cookies on our websites or online service and in social media networks, in addition to the data mentioned above, we may collect the following data by the usage of cookies:

- information about the end device (IP-address, operating system, browser version and information as such)
- information about the site views and user information, such as information about the geographical location
- preferences and profiling information for targeting the marketing
- information collected by analytics systems, for more information of these, see <https://www.orkla.com/legal/fi/evasteiden-ja-henkilotietojen-kaytto/>

Where the controller collects the data stored in the register (regular information sources)?

The data is collected from the data subject himself/herself.

The data is also collected from our websites and services and from our sites in the social media based on the activity of the visitors by using cookies if the data subject has given his or her consent to the use of cookies.

Does the controller transfer the data to other recipients or outside the EU or European Economic Area?

The data stored in the register is processed inside the Orkla Foods Finland Oy, Orkla Confectionery & Snacks Finland Ab and other Orkla Group companies for the purpose of developing the business. The data can be transferred to third parties when required by applicable law or, for instance, when we are required to respond to a legal claim.

The data collected from our websites or online services by using cookies is processed within the Orkla Group, but the controller may also employ external service providers (inter alia analyzing service companies) to process the data.

When employing external service providers, we are taking care of that they are using the data only for the purposes defined by the controller.

The personal data will be stored on the servers of Microsoft in Europe. In certain situations, the external service providers that we are using may be located and/or process the personal data collected by us also outside the European Economic Area in so-called third countries. In such situations we are ensuring the legal basis for international transferring of personal data in accordance with the Privacy Shield –arrangement or the model clauses of EU or by otherwise ensuring that all the requirements for transferring and processing of data in third countries pursuant to the general data protection directive of EU are fulfilled.

How long the personal data will be stored for?

Orkla Foods Finland Oy and Orkla Confectionery & Snacks Finland Ab are storing the personal data only for a period which is limited to fulfilling the purpose of the register.

The data stored in the register will be erased after having processed your inquiry or feedback and in general for a maximum of one (1) year since your inquiry/feedback has been sent to us. However, the data may be stored longer, if necessary, in case the data is justifiably needed longer in order to fulfill the purpose of the consumer service register, like resolving the customer feedback or responding to the claim or if the data is justifiably needed longer based on law.

As for the personal data collected from our websites or online service, we are erasing your data when the reported purpose of processing has ceased.

In respect of those who have given permission to direct marketing, we are processing the data collected for marketing purposes for as long as your permission to direct marketing is active.

How my personal data is protected (security measures and -procedures)?

The register is kept electronically and adequately protected by technical means of protection and data protection methods.

The usage of the register is permissible only for designated persons who are responsible of maintaining the register and/or processing personal data. The users have usernames and passwords for the usage of electronic systems containing personal data. The databases are protected by means of fire walls and other technical protection measures, and the servers are protected.

The persons processing personal data are under a binding obligation of secrecy and they have signed a confidentiality agreement, in which they have agreed to comply with Orkla's policy of personal data protection and valid legislation. The personnel have been instructed to process personal data.

The register information is protected from external use and the usage of the register is supervised. Written agreements have been entered into with the external service providers, in which they have committed to comply with Orkla's policy of personal data protection and valid legislation.

What rights do I have as a data subject?

The data subject shall have the right inspect the data stored in the register concerning him or her. The right to inspection shall also cover the right to know whether no such data has been stored to the register. The data subject shall have the right to request that the data concerning him or her is to be rectified, erased or completed, provided that the recorded data is erroneous,

unnecessary, incomplete or outdated for the purpose of processing and collecting data as specified in this privacy policy and information document. Furthermore, the data subject shall have the right to request limitation of processing the personal data concerning him or her. The data subject shall have the right to request the personal data to be transferred from one system to another, which covers the data subject's right to have the personal data concerning him or her and which have been transferred to the controller in a structured, commonly used and in a mechanically readable format, when the processing is based on consent and is performed automatically.

A data subject, who wishes to use the aforesaid rights above, shall present a specified request to the contact person in matters relating to the register (see section 2). The request shall be personally signed by the data subject. A reasonable compensation shall be collected in case less than one year has elapsed since the last request for the execution of an inspection and information request.

Can I prohibit, restrict, or oppose to processing of my personal data?

The data subject shall have the right to prohibit the processing of personal data, withdraw his or her consent to processing of personal data and to object to the processing without the cancellation and/or objection having effect on the lawfulness of the processing before the cancellation and/or objection. The request concerning cancelling the consent or objecting to the processing shall be presented to the contact person (see section 2) personally signed by the data subject or otherwise presented in a reliably certified document.

Can I prohibit the marketing targeted at me?

The data subject shall have the right to withdraw his or her consent to the use of personal data for electronic marketing purposes. The prohibition can be made any time by making an announcement to the marketing department of Orkla by e-mail to the address viestintä@orkla.fi.

Who can I make a complaint to about the processing of my personal data?

The data subject shall have the right to make a complaint to the data protection authority in case he or she considers that the processing of personal data concerning him or her is contravening effective law.

Changes in the privacy policy

Orkla Foods Finland Oy and Orkla Confectionery & Snacks Finland Ab are continuously developing their practices concerning the processing of personal data in accordance with changing legislation and new needs. The updated version of the privacy policy and information document of the consumer service register is always found on our website at the address: www.orkla.fi

This privacy notice was last updated on 16 June 2020