

INTEGRITY NOTICE – SUBCONTRACTORS, SUPPLIERS, BUILDING SITE WORKERS AND VISITORS

1. INTRODUCTION AND CONTACT DETAILS

- 1.1 In this integrity notice, Bonava explains how your personal data is processed when you are working at Bonava building site and/or are working for a company that provides services and/or goods to Bonava. It is important to us that you feel confident that we treat your personal data with due care. We have therefore implemented the technical and organisational security measures necessary in order to protect your personal data against unauthorised access and use. We encourage you to take the time to read this integrity notice carefully.
- 1.2 Bonava Suomi Oy (company ID 2726714-3) is the data controller and thereby responsible for the processing of your personal data carried out by us or on our behalf. If you have any questions regarding the processing, you are welcome to contact Bonava contract representative named in the contract made between us.

2. WHAT PERSONAL DATA DO WE PROCESS?

- 2.1 Personal data is all information that may be associated with you as an individual. We process the following personal data if you or your employer make them available to us:
- Your name, contact details, position in the company
 - Your tax number, date of birth, nationality
 - Your qualifications (such as work safety, fire work, first aid or others)
 - Copy of ID-card
 - Information concerning your right to work in Finland such as residence permit, work permit, A1 certificate, passport copy
 - Information that you or your employer have made available to us
 - Information that is required in legislation such as in the Act on the contractors obligations and liability when work is contracted out
 - Information on the access control such as log information and times on the entries and exits in and out of the building site
 - Information that is saved in the information systems used by Bonava such as log information and IP address
 - Photos and video material of building site security systems
 - Information that you or our customers share with us in the course of the execution of the contracts that we conclude with your employer
 - Information about listing on sanctions registers, including information regarding the reason for you being listed on the sanctions register, if applicable, if you directly or indirectly own or control a company that conduct, or are about to conduct, business with us, or otherwise is involved in carrying out such business. This may, for example occur, when we fulfil our obligations to comply with international sanctions. We may collect this data from third parties.

3. FOR WHAT PURPOSES DO WE PROCESS YOUR PERSONAL DATA?

- 3.1 We use the personal data listed above for the purposes of:
- Contacting you in connection with the contracts we conclude with you or your employer
 - Analyse previously concluded contracts and subcontractor/supplier performance
 - Handle customer inquiries and customer relations
 - Follow-up on health & safety requirements
 - Prevent illegal employment
 - Building site access control
 - To fulfil our obligation that are based on legislation such as the Act on the contractors obligations and liability when work is contracted out, work safety and taxation process legislation

- Ensuring that Bonava does not conduct business with entities or individuals that are put on an international sanctions list.

4. WHEN IS YOUR PERSONAL DATA ERASED?

- 4.1 Your data is retained as long as we require the information for the activities set out above, at least for the duration of the contract performance including the warranty and responsibility periods, and the periods required by legislation.

5. WITH WHAT LEGAL BASIS DO WE PROCESS YOUR PERSONAL DATA?

- 5.1 Most of the processing we perform for the purpose of administration and management of our employment/consultancy relationship with you is necessary for our performance of the contract that we have entered into with you or your employer.
- 5.2 Other processing activities are based on a balancing of interest. Thus, we have a legitimate interest of processing the data (e.g. to analyse previously concluded contracts, subcontractor/supplier performance, handle customer inquiries, prevent illegal employment, fulfil our legal obligations) and we do that in a way that does not interfere with your privacy.
- 5.3 Processing of data in order for us to verify that we do not conduct business with individuals or entities that are put on any sanctions lists are necessary for compliance with legal obligations.

6. TO WHOM DO WE DISCLOSE YOUR PERSONAL DATA?

- 6.1 Your personal data may be shared within the Bonava group for the purposes of monitoring and analysing concluded contracts and concluding new contracts with your employer. We will also disclose your data to authorities, if required by law, regulation or administrative decisions. Furthermore, we share your data with other subcontractors and suppliers to a reasonable extent to coordinate the construction process, or to our customers if necessary for contacting purposes.
- 6.2 We may also share your personal data with our customers in order to ease communication in the construction process and the warranty period.
- 6.3 If we transfer your data to external companies outside the EU/EEA, we ensure that appropriate security measures have been taken, such as including the EU Commission's standard contractual clauses for data transfers (which are available at the EU Commission's website) in our agreements with the parties accessing personal data.

7. YOUR RIGHTS IN CONNECTION WITH OUR PROCESSING

- 7.1 Pursuant to applicable data protection legislation, you have the following rights in connection with our processing of your personal data:
- Right of access, i.e. a right to obtain information about what personal data we process about you and a copy of the personal data being processed
 - Right to rectification, i.e. a right to have incorrect data corrected
 - Right to erasure, i.e. a right to have your personal data deleted
 - Right to restriction of processing, i.e. a right to request that our processing is restricted, e.g. if you contest the accuracy of the personal data we are processing
 - Right to data portability, i.e. a right to request that your personal data is being transferred from us to another company
 - Right to object to our processing of your personal data
 - Right to withdraw your consent, a withdrawal will however not affect the lawfulness of processing based on your consent before its withdrawal

- Right to lodge a complaint with a supervisory authority if you consider that our processing does not comply with the applicable data protection legislation
 - The supervisory authority in Finland is The Office of the Data Protection Ombudsman
Visiting address: Lintulahdenkuja 4, 00530 Helsinki
PO Box: PL 800, 00531 Helsinki
Phone/Switchboard: 029 566 6700
Phone/Registry: 029 566 6768
E-mail: tietosuoja(at)om.fi

7.2 Some of the rights above are only applicable in certain situations. In case you would like to exercise any of your rights, please contact us via the contact details above.

We reserve the right to clarify and specify the integrity notice.
