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<b>1</b> <b>Filing system</b>	
<b>2</b> <b>Controller</b>	<p>Name Patria Oyj</p> <p>Address Kaivokatu 10 A FI-00100 Helsinki, Finland</p> <p>Other contact information (e.g. telephone during office hours, email address) info@patriagroup.com</p>
<b>3</b> <b>Data protection officer / contact person in matters relating to the filing system</b>	<p>Name Birgitta Selonen</p> <p>Address Kaivokatu 10 A FI-00100 Helsinki, Finland</p> <p>Other contact information (e.g. email address, telephone during office hours) info@patriagroup.com</p>
<b>4</b> <b>Purpose of processing personal data, legal basis for processing and information on the source of the personal data</b>	<p>The purpose of this personal data filing system is to collect stakeholders' contact information in order to send them Patria's news releases and company surveys.</p> <p>The filing systems contain both public and group-internal information.</p> <p><b>Purposes for processing personal data, legal basis for processing and data collection:</b></p> <ol style="list-style-type: none"> <li> <p><b>1. Press release distribution list</b></p> <p>Basis for processing: voluntarily given information, legitim interest            Purpose of the fling system: External communication, marketing communication and stakeholder surveys            Data collected from: Voluntarily given information via website, public organisational systems.</p> </li> <li> <p><b>2. Stakeholder survey distribution list</b></p> <p>Basis for processing: voluntarily given information, legitimate interest            Purpose of the filing system: Group's internal and external surveys            Data collected from: Voluntarily given information via website, stakeholders' public organisational systems as well as internal systems.</p> </li> <li> <p><b>3. Material Bank registry</b></p> <p>Basis for processing: voluntarily given information, legitimate interest            Purpose of the filing system: User information, information about searched and uploaded material            Data collected from: Voluntarily given information via website, internal systems.</p> </li> <li> <p><b>4. Website registry</b></p> <p>Basis for processing: voluntarily given information            Purpose of the filing system: Communication and marketing            Data collected from: Voluntarily given information via website, third party.</p> </li> </ol>

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	<p>The personal data in the above-mentioned subsystems is processed on the following legal bases:</p> <ul style="list-style-type: none"><li>a) processing is necessary for the preparation of performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; and/or</li><li>b) processing is necessary for compliance with the controller's statutory obligation; and/or</li><li>c) processing is necessary to establish the controller's legitimate interests.</li></ul>
<p><b>5</b> <b>Description of the categories of data subjects and categories of personal data</b></p>	<p>The following personal data is collected for this filing system:</p> <ul style="list-style-type: none"><li><b>1. Press release distribution list</b> The data subjects are: Co-operation partners and stakeholders, media The following information is stored about the data subjects: first name, last name, email address, company</li><li><b>2. Stakeholder survey distribution list</b> The data subjects are: Patria personnel, customers and stakeholders The following information is stored about the data subjects unless the survey is not taken anonymously: first name, last name, email address, answers to the survey</li><li><b>3. Material Bank registry</b> The data subjects are: Patria personnel, customers, co-operation partners and stakeholders The following information is stored about the data subjects: first name, last name, email address</li><li><b>4. Website registry</b> The data subjects are: Customers, co-operation partners, stakeholders The following information is stored about the data subjects: first name, last name, email address, title, email address, IP address Google Analytics provides visitor statistics that is used to improve the service. Information collected by cookies is anonymous and the visitor can prevent the collection.</li></ul>
<p><b>6</b> <b>Legitimate interests of the controller or a third party</b></p>	<p>Article 6(1)(f) of the EU General Data Protection Regulation (GDPR) (legitimate interest of the controller) is not applied to the processing of data performed by public authorities in the course of their duties. In this context, Patria can be interpreted as an authority or similar body.</p> <p>The need will be assessed on a case-by-case basis. Balance test has been done 1.10.2020.</p>

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<p><b>7</b> <b>Recipients and disclosure of personal data</b></p>	<p>As a broad interpretation of Article 4(9) of the GDPR, the parties (processors/recipients of personal data) to which Patria as a controller transfers personal data for processing (for example, in the context of performing maintenance tasks via a technical interface) are listed below.</p> <p>Access to the personal data in this filing system will be granted to the system supplier (private-sector system supplier(s)) as necessary for investigating any technical hardware or software failure.</p> <p>In addition, personal data in the Corporate Security filing systems is disclosed as necessary:</p> <ol style="list-style-type: none"> <li>1) for executing orders issued by the authorities, to the authority requesting the data;</li> <li>2) to the suppliers of information systems, tools and equipment required for various tasks and to the suppliers in charge of identity and access management;</li> <li>3) to suppliers investigating security incidents or nonconformities;</li> <li>4) to attorneys and law firms providing legal services;</li> <li>5) courts.</li> </ol>
<p><b>8</b> <b>Transfer of personal data to a third country or an international organisation</b></p>	<p>According to Article 45(1) of the GDPR, the transfer of personal data to a third country or an international organisation may take place where the Commission has decided that the third country, a territory or one or more specified sectors within that third country, or the international organisation in question ensures an adequate level of protection. Such a transfer does not require any specific authorisation.</p> <p>The personal data in Patria's Corporate Security filing system may be transferred outside the EU/ETA on the following conditions:</p> <ul style="list-style-type: none"> <li>- <b>In accordance with Article 46 of the GDPR:</b> Transfers (of personal data) subject to appropriate safeguards. Data will not be disclosed outside the EU, European Economic Area or countries decided by the Commission to provide an adequate level of protection unless an adequate level of protection is ensured through contracts or otherwise as required by law.</li> </ul>
<p><b>9</b> <b>Data retention period</b></p>	<p>Data collected for Patria's Corporate Security filing systems will only be stored for as long as and to the extent necessary in relation to the original and compatible purposes for which the personal data was collected.</p> <p>Personal data will be deleted from the filing system as follows:</p> <ol style="list-style-type: none"> <li>1. Press release distribution list Information is stored until unsubscription information is received. In case Patria decides to cease press release distribution all information will be destroyed.</li> <li>2. Stakeholder survey registry</li> </ol>

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	<p>Survey material may be stored up to three (3) years.</p> <ol style="list-style-type: none"> <li>3. Material Bank registry Data is stored three (3) years. Information will be deleted upon request.</li> <li>4. Website registry Data is store three (3) years.</li> </ol>
<p><b>10</b> <b>Principles of data protection; description of technical and organisational security measures</b></p>	<p>Personal data will remain confidential. Patria Plc's data network or server environment or the cloud services in which the filing systems are located are protected by the necessary technical and organisational measures.</p>
<p><b>11</b> <b>Rights of the data subject</b></p>	<p>Data subjects have right of access to any personal data stored on them in the filing systems. According to the GDPR, the controller must reply to the data subject's request to exercise their rights within one month of receipt of the request.</p> <p><b>A. Right of access to personal data</b></p> <p>Data subjects have right of access to any personal data stored on them in Patria's Corporate Security personal data filing system. The request to access or rectify personal data should be sent in writing to one of the following Patria offices: Helsinki, Hämeenlinna, Tampere, Halli. The data subject must prove their identity when requesting access or rectification.</p> <p>Opening hours: Mon–Thu from 8 a.m. to 4 p.m.</p> <p><b>B. Right to rectification and restriction of processing</b></p> <p>Data subjects have the right to require the controller to rectify inaccurate and incorrect personal data concerning them.</p> <p>Data subjects have the right to restrict processing by Patria as the controller of this filing system where one of the following applies:</p> <ul style="list-style-type: none"> <li>- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;</li> <li>- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of its use instead;</li> <li>- the controller no longer needs the personal data for the purposes of the processing, but it is required by the data subject for the establishment, exercise or defence of legal claims;</li> <li>- the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.</li> </ul>

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	<p>The request to rectify or restrict the processing of personal data in Patria's Corporate Security filing system should be sent in writing to one of the following Patria offices: Helsinki, Hämeenlinna, Tampere, Halli. The data subject must prove their identity when making the request for rectification or restriction.</p> <p><b>C. Right to erasure</b></p> <p>Data subjects have the right to have the personal data concerning them erased from Patria's Corporate Security filing system without undue delay where one of the following grounds applies:</p> <ul style="list-style-type: none"> <li>- the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;</li> <li>- the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing;</li> <li>- the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2);</li> <li>- the personal data has been unlawfully processed;</li> <li>- the personal data has to be erased to comply with a legal obligation in Union or national law.</li> </ul> <p>The request to erase personal data should be sent in writing to one of the following Patria offices: Helsinki, Hämeenlinna, Tampere, Halli. The data subject must prove their identity when requesting access or rectification.</p>
<p><b>12</b> <b>Right to object</b></p>	<p>According to Article 21 of the GDPR, data subjects have the right to object, on grounds relating to their particular situation, to the processing of personal data concerning them which is based on Article 6(1)(e) (processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller), including profiling based on those provisions. The controller may no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.</p> <p>The processing objection request should be sent in writing to one of the following Patria offices: Helsinki, Hämeenlinna, Tampere, Halli. The data subject must prove their identity when requesting access or rectification.</p>
<p><b>13</b> <b>Data portability</b></p>	<p>Once the data subject has provided Patria with the personal data concerning them in a structured, commonly used and machine-readable format, they have the right to have that data transmitted to another controller when:</p> <ul style="list-style-type: none"> <li>a) the processing is based on the data subject's consent or on a contract between the controller and data subject; and</li> <li>b) the processing is carried out by automated means; and</li> <li>c) the transfer is technically feasible.</li> </ul>
<p><b>14</b> <b>Right to withdraw consent</b></p>	<p>Press release distribution list: Data subjects have the right to unsubscribe by using a link in the release or by requesting it in the mentioned Patria locations.</p>

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	<p>Material bank: Data subjects have right to have their information deleted by sending request to <a href="mailto:communications@patriagroup.com">communications@patriagroup.com</a> or by requesting it in the mentioned Patria locations.</p> <p>Website: Data subjects have right to have their information deleted by sending a request to <a href="mailto:communications@patriagroup.com">communications@patriagroup.com</a> or by requesting it in the mentioned Patria locations.</p>
<b>15 Right to complain to the supervisory authority</b>	<p>Data subjects have the right to lodge a complaint with a supervisory authority if they consider that the processing of personal data concerning them infringes the applicable data protection regulations. The national supervisory authority in Finland is the Office of the Data Protection Ombudsman; contact details:</p> <p>Office of the Data Protection Ombudsman Visiting address: Ratapihantie 9, 6th floor FI-00520 Helsinki, Finland</p> <p>Postal address: P.O. Box 800 FI-00521 Helsinki, Finland</p> <p>Telephone (switchboard): + 358 29 56 66700 Fax: +358 9 56 66735 Email: tietosuoja@om.fi</p>
<b>16 Automated decision-making and profiling</b>	<p>The personal data in the Corporate Security filing system will not be used for automated decision-making or profiling.</p>
<b>17 Additional information</b>	<p>We reserve the right to amend this Privacy Policy. The up-to-date Privacy Policy is available from Patria's instruction system or, upon request, at <a href="mailto:security@patriagroup.com">security@patriagroup.com</a>.</p>
<b>18 Updates</b>	<p>The document was last updated on 2.10.2020</p>
<b>19 Appendices</b>	<p>Balance test 1.10.2020</p>