

## PRIVACY NOTICE - WÄRTSILÄ'S CUSTOMERS

### 1 Purpose

Purpose of this Privacy Notice is to provide the persons communicating with Wärtsilä or otherwise registered in Wärtsilä in the role of a customer or potential customer about processing of their personal data. This Privacy Notice gives a general understanding of such personal data processing. However, the individual situations in which personal data is being processed may vary significantly. Thus, all of the information provided in this Privacy Notice may not be applicable to each different data processing situation. If you want more detailed information in relation to how specifically your personal data is being processed, you should contact your own principal contact person or use the contact information provided in section 13 of this Privacy Notice.

### 2 Data Controller

In respect of each data subject's personal data, the controller is regarded to be the Wärtsilä Group company which has a contractual relationship or other co-operation relationship with the organisation the data subject is representing or with an individual customer. To certain extent, Wärtsilä Group companies are sharing so called global data systems, which are provided by Wärtsilä Corporation to the entire group. The global data systems are jointly controlled by Wärtsilä Corporation and each individual group company processing personal data in such systems.

For the avoidance of doubt, in this Privacy Notice "**Wärtsilä**" shall refer to the company acting as the data controller in each individual case, or in case of global data systems, Wärtsilä Corporation and the applicable local group company together.

Regardless of the applicable data controller in each situation, the data subjects can always use their rights by contacting their own principal contact person or Wärtsilä Corporation as instructed in section 13.

Contact address:  
Hiililaiturinkuja 2  
P.O. Box 1834  
00080 WÄRTSILÄ  
Finland

Other contact details:  
E-mail: [dataprotection@wartsila.com](mailto:dataprotection@wartsila.com)

### 3 Lawfulness of Processing

The legal basis for processing of the personal data is either fulfilment of an agreement concluded between a Wärtsilä Group company and an organisation that the data subject is representing or with an individual customer or the legitimate interest of the data controllers. Such legitimate interests consist of e.g. managing and developing of Wärtsilä Group's customer relationships, business functions and communications, allowing application and system usage.

In some cases personal data may also be used to comply with a legal obligation.

Consent may also be used as a processing ground when explicitly provided, e.g. when sensitive information may be collected.

Please notice that, even though usually the customers of Wärtsilä Group are legal entities and not natural persons, in order to enable certain processing activities, processing of the personal data of the natural persons representing and working for the customer companies and potential customer companies is inevitable. In some cases, customers may also be natural persons.

## 4 Purpose of Processing

Maintaining customer information is necessary to enable fulfilment of contracts, organising of Wärtsilä's business functions, offering learning and development services and maintaining such records, delivery management, co-operation and business relationship management as well as to enable efficient marketing of Wärtsilä products or services, communications and sales activities and customer satisfaction surveys.

The customer related personal data can also be used for improving the customer experience by developing the services and analysing the customer's interests. The customer related personal data may also be used to evaluate customer satisfaction and need for sales related actions. This may include e.g. targeting of marketing of Wärtsilä products or services or other types of communications. The aim of these measures is however not related to the individual data subjects as such, but to the company or other entity he/she is representing.

Personal data can also be used to allow use of and monitor use of data systems for purposes of data security and user control, as well as for other purposes related to ensuring security and rights of other persons as well as proprietary rights of Wärtsilä. Monitoring shall always be limited to what is specifically allowed under applicable local laws.

Furthermore, personal data can be used to ensure compliance with certain statutory obligations e.g. record keeping, audit obligations and compliance screening obligations (prevention of white-collar crimes and money laundering), and Wärtsilä policies as well as industry standards.

Personal data may also be retained for dispute resolution purposes in order to solve disputes and to establish, exercise and defend legal claims.

Certain data processing activities may and have been outsourced to carefully selected third party service providers to support Wärtsilä's internal operations. Data can also be used for marketing purposes from Wärtsilä Corporation's carefully selected partners.

## 5 Types of Personal Data

- 1) Contact information, including name, title, e-mail address, reporting to, role and possible other necessary information to enable efficient and timely contacting and communication
- 2) Additional information needed to efficiently manage the business contact, such as interests and activities, birthday, etc.
- 3) Company contact information
- 4) Marketing information, e.g. campaign history
- 5) Related sales projects, opportunities, customer visits, lead sources, and other project data and historical project information
- 6) Customer feedback and reviews
- 7) Learning and training information, e.g. learning history and test results
- 8) Location data collected from customers' mobile devices or otherwise subject to specific request/instruction and/or consent of the customer
- 9) Information if the customer does not want to receive marketing messages
- 10) Monitoring and user log data, including data related to use of websites, applications, platform services, software and other IT systems, camera surveillance data, users logs, IP-addresses and physical access control data. Monitoring shall always be limited to what is specifically allowed under applicable local laws.

- 11) Information received from commercially available sources, such as credit agencies
- 12) Information produced by compliance and sanction screenings
- 13) Dietary information may be collected in relation to event registration subject to specific request/instruction and/or consent of the customer

Types of personal data may also contain some other similar and relevant contact/business information for the purposes of managing customer relationship as described in section 4.

## **6 Regular sources of information**

The primary sources of customer related personal data are the data subjects, the internal customer owner in Wärtsilä (e.g., account manager), the companies that the data subjects represent, web pages of these companies as well as other public sources, such as trade registers. Personal data may also be collected from reliable third parties, e.g. external service providers. Location data may be collected from a customer's mobile or other device in cases, where such customer has specifically requested/instructed and/or consented to collection of location data.

## **7 Data Retention**

Wärtsilä updates the personal data actively and regularly deletes unnecessary and outdated data when the business relationship or other communications between the data subject and Wärtsilä are active. After the relationship between the customer and Wärtsilä becomes passive, Wärtsilä retains the personal data for pre-defined time periods based on Wärtsilä's genuine needs or legislative requirements Wärtsilä is subject to. The data is deleted gradually in accordance with Wärtsilä's Personal Data Retention Policy. For more information regarding the retention times, you may contact Wärtsilä Corporation by using the contact details provided in section 13.

## **8 Regular Data Disclosure**

Personal data may be disclosed to Wärtsilä Group companies for purposes compatible with the processing purposes defined in section 4 of this Privacy Notice. Moreover, personal data may be transferred to Wärtsilä's suppliers, agents, distributors, consultants, and other service providers, some of which may be located outside of EU/EEA countries.

## **9 Data Transfers from EU/EEA**

If personal data is transferred outside of the EU/EEA area, the data controller ensures that sufficient level of data protection is maintained through appropriate safety measures, e.g. EU commission's model clauses. More information of such international data transfers and the applied safeguards may be received by using the contact details provided in section 13.

## **10 Data Security**

Hard copies shall always be stored in locked-up premises. The data may be processed only by such Wärtsilä's employees who need to have access to the manual data as a part of their duties.

Wärtsilä's IT systems apply customary authorisation processes, e.g. individual access rights and passwords. Access is allowed only for such persons who have a legitimate need to access the personal data.

In case of outsourced applications and data processing activities, Wärtsilä protects the data security by applying appropriate confidentiality and other clauses in the outsourcing agreements.

**11 Data subject's rights**

**11.1 Data subject's right to object personal data processing**

When the personal data processing is based on the data controller's legitimate interest (only), the data subject is entitled to object the processing of his/her personal data on grounds relating to his/her particular situation.

Data subject may send his/her request to object the processing in accordance with section 13 of this Privacy Notice. In this request, the data subject shall define the particular situation based on which data subject is objecting the data processing. Wärtsilä may decline the request on statutory grounds.

**11.2 Access to information**

Data subject is entitled to obtain information of the personal data concerning him/her which Wärtsilä is processing and obtain a copy of such personal data. Request for access may be presented to Wärtsilä in accordance with section 13 of this Privacy Notice.

**11.3 Right to rectification, erasure and restriction**

Data subject is entitled to have any such personal data that is inaccurate, outdated, unnecessary or contrary to the purposes of data processing corrected or erased. Requests concerning rectification and erasure may be presented in accordance with the instructions in section 13 of this Privacy Notice.

Data subject is also entitled to have the data controller to restrict processing of the data subject's personal data for example when data subject is waiting for the data controller's answer to data subject's access or erasure request.

**11.4 Right to lodge a complaint**

If the data controller does not follow the applicable data protection regulation, a data subject is entitled to lodge a complaint with competent data protection authority.

**12 Using data subject's rights**

As a general rule, Wärtsilä does not charge the data subject for using his/her rights presented in section 11. However, Wärtsilä may, at its sole discretion,

- (a) refuse to fulfil; or
- (b) charge a reasonable fee for fulfilling of

several similar consecutive requests or requests that are manifestly unfounded or excessive. Wärtsilä is also entitled to decline requests on statutory grounds.

**13 Contacting the Data Controller**

In all questions and matters relating to personal data processing or rights of the data subject, data subjects can contact Wärtsilä Corporation. Wärtsilä Corporation shall further communicate the matter to the Wärtsilä entity considered as the data controller in the respective case. Data subjects may use their rights by e-mail to [dataprotection\[at\]wartsila.com](mailto:dataprotection[at]wartsila.com)