

# ABLOY OY'S PRIVACY POLICY

Abloy Oy respects your privacy and is committed to protecting your personal data. The purpose of this privacy policy is to inform you about how your personal data is collected, processed, and shared in Abloy's sales, marketing, and customer management activities.

Customer means a company that buys products or services either directly from Abloy or from its distributors, as well as stakeholders and partners involved in the design / purchase process of this company, such as architects, consultants and building engineers. Private persons who purchase products or services either directly from Abloy or its distributors are referred to in this document as consumer customers.

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## 1. WHO IS THE DATA CONTROLLER?

The data controller in accordance with this privacy policy is

Abloy Oy ("**Abloy**")

If you have any questions regarding this privacy policy, you can contact us by email at [privacy@abloy.com](mailto:privacy@abloy.com).

For other matters, you can find the right contact details at [www.abloy.fi](http://www.abloy.fi).

## 2. WHAT DATA DO WE COLLECT AND HOW?

The following describes what personal data we may collect about you and how we collect it. In section three (3) of this privacy policy you will find a table in which we have specified the purposes and the legal bases for processing of your personal data.

We may collect, use, retain and transfer your personal data, which we have grouped as follows:

- A. **Identification data** means information such as your name or date of birth.
- B. **Company data** means the name, business ID, address, and industry of the company you represent as well as your position in the company.
- C. **Contact details** mean email, telephone number and address.
- D. **Transaction data** means the products or services which you have purchased from us, information about the products and services offered to you, details of the

contracts we have concluded, the payments we have made to you and the payments you have made to us.

- E. **Profile data** means information about your purchases, interests, preferences, feedback given by you, your responses to surveys, your communication language, and your participation in competitions.
- F. **Video and audio recordings** mean photographs, videos, or audio recordings of you or other recordings that can be attributed to you.
- G. **Statements** mean statements and other information about you site or the company you represent.
- H. **Technical data** means your IP address, login information, browser information (type and version), time zone and location, browser version and extensions, operating system and platform, and other technical devices.
- I. **Usage data** means information that reflects your interaction with our marketing and services. The information collected may include, for example, information on how you have arrived on our website or how you have reacted to our marketing. Usage data also means information generated when you use our order management software or customer service portal.
- J. **Marketing and communications data** means your preferences regarding the receipt of marketing from us and our partners as well as your communications settings.
- K. **Phone call data** means information and recordings of phone call conversations you have had with us. Information stored about the phone calls include when the call has taken place, which customer service representative has answered the call, which number the call has been made to, and the phone number from which the call has originated from.

In principle, the information is collected directly from you when you purchase, use or consider purchasing our products or services, when you request our newsletter or other marketing from us, or when you otherwise interact with us. If you are a company representative, we may collect this information from your employer. We may collect and update your information from public authorities and companies that provide services related to personal data.

When you use our website, our ordering software or our services, we may automatically collect technical data and usage data from the devices you use, and from your browsing and browsing behaviour in the statistical tracking of the number of visitors to the services, and for the purpose of measuring the effectiveness of advertising. We collect this information by using cookies and other similar technology. You can read more about our use of cookies at <https://www.abloy.com/global/en/privacy-centre/cookie-policy>.

### 3. PURPOSES AND LEGAL BASES FOR PROCESSING OF PERSONAL DATA

We will only process your personal data to the extent permitted by law. We process your personal data mostly in the following situations:

- i. The processing is necessary for the performance of **a contract** to which we have entered into or are entering into with you in accordance with Article 6(1)(b) of the General Data Protection Regulation ("**GDPR**").
- ii. The processing is necessary for compliance with **a legal obligation** pursuant to Article 6(1)(c) of the GDPR or for the establishment, exercise or defence of legal claim pursuant to Article 9(2)(f) of the GDPR.
- iii. You have given us your **consent** to the processing of your personal data in accordance with the GPDR pursuant to Article 6(1)(a) or 9(2)(a) of the GPDR.

- iv. The processing is necessary for the purposes of the **legitimate interests** pursued by us or a third party, except where your interests requiring the protection of personal data or your fundamental rights and freedoms override such interests in accordance with Article 6(1)(f) of the GDPR.
- v. We may process data relating to your personal identification number in accordance with Section 29 of the Data Protection Act or where there is a legal basis for doing so identified in (i), (iii) and (iv) above. We may disclose your personal identification number where it is of decisive importance for uniquely distinguishing you or where a public authority requires its disclosure.

In the table below we have described the purposes for which we will use your personal data and the legal bases on which we process your data. We have also described our legitimate interests where processing is based on this legal basis.

Purpose	Data type	Legal basis for processing, including the justification for the legitimate interest
<p>Entering into contracts with business customers and managing these contracts and the customer relationship, including:</p> <ul style="list-style-type: none"> <li>Registration of a new customer and a customer representative</li> <li>Buying our services</li> <li>Management and collection of payments for our products and services, debt collection</li> <li>Providing customer benefits and customer service</li> <li>Managing the complaints process</li> </ul>	<p>A. Identification data</p> <p>B. Company data</p> <p>C. Contact details</p> <p>D. Transaction data</p> <p>G. Statements</p>	<p>Entering into <b>a contract</b> with you or taking action at your request before entering into a contract</p> <p>Compliance with <b>legal obligation</b> (accounting, auditing, and taxation)</p>
<p>Consumer customer management, including:</p> <ul style="list-style-type: none"> <li>Managing contacts and product orders</li> <li>Managing the product complaint process</li> </ul>	<p>A. Identification data</p> <p>C. Contact details</p> <p>D. Transaction data</p>	<p><b>Contract</b> between the data subject and the controller</p>
<p>Customer representative dealings in order management software (excluding CORE, for CORE see <i>Customer representative contacts and dealings in the ABLOY CORE service portal</i>), including:</p> <ul style="list-style-type: none"> <li>Managing users and access rights</li> <li>Processing, delivering and archiving orders</li> </ul>	<p>A. Identification data</p> <p>B. Company data</p> <p>C. Contact details</p> <p>D. Transaction data</p> <p>H. Technical data</p>	<p><b>Legitimate interest</b> of the controller to fulfil its rights and obligations under customer contracts and orders placed through order management software</p> <p>Cookies related to order management software: <b>consent</b></p>

<ul style="list-style-type: none"> <li>• Management, support and maintenance of order management software</li> <li>• Optimisation and customisation of order management software</li> </ul>	I. Usage data	
Online store customer's data related to Yale personnel online store	A. Identification data B. Company data C. Contact details D. Transaction data	<b>Contract</b> between the data subject and the controller
Dealings with partners and other stakeholders in locking projects (such as architects, building companies, and builders) <ul style="list-style-type: none"> <li>• Execution of the planning, design and sales process for assignments</li> <li>• Access rights management in the door environment design tool</li> </ul>	A. Identification data B. Business information C. Contact details G. Statements	<b>Legitimate interest</b> of the controller to fulfil its rights and obligations under the customer contracts
Sending newsletters and other marketing, and maintaining a marketing prohibition register	A. Identification data B. Company data C. Contact details E. Profile data J. Marketing and communications data	<b>Consent</b> and, in addition, we have a <b>legitimate interest</b> to send you relevant marketing  We send you marketing by email or via other relevant electronic communication channels if you have given us your consent, or if we are otherwise entitled to do so under the Act on Electronic Communications Services  We maintain a register of customers who have prohibited marketing. The register is necessary for ensuring that the customer will not be transferred back to marketing lists
Organising events and activities	A. Identification data B. Company data	<b>Consent</b>

	C. Contact details  E. Profile data  J. Marketing and communications data	
Providing customer service and various competitions and draws for customers and potential customers	A. Identification data B. Company data C. Contact details E. Profile data J. Marketing and communications data	We have a <b>legitimate interest</b> to communicate with you and to enable your participation in competitions and draws
Analysis and development of data subject's interest and business processes	A. Identification data B. Company data C. Contact details D. Transaction data E. Profile data	We have a <b>legitimate interest</b> to analyse and develop our business, products, and services
Use of references and reference stories for advertising, marketing, communication, and similar purposes	A. Identification data B. Company data C. Contact details F. Video and audio recordings G. Statements	<b>Consent</b>
Use of images, video and audio material produced during filming for advertising, marketing, communication, and similar purposes	A. Identification data B. Company data C. Contact details F. Video and audio recordings G. Statements	<b>Consent</b>

Phone call data and recordings	K. Phone call data	<b>Legitimate interest</b> to improve and develop customer service, for training purposes and to ensure the content of the parties' agreement. The calls will not be used for any other purpose
Conducting export control and sanctions screening in a third-party risk assessment tool that includes EU and UN approved sanctions lists	<p>A. Identification data</p> <p>B. Company data</p> <p>C. Contact details</p> <p>If your name appears on export control and sanctions lists, we may also screen your personal data in relation to criminal convictions and offences</p>	<p><b>Legitimate interest</b> to comply with applicable legal obligations and to reduce risks to third parties outweighs the interest of the data subject in not having the personal data processed for this purpose</p> <p>In cases where personal data relating to criminal convictions and offences are archived, the processing is based on Abloy's legal obligations under export control and sanctions laws</p>
ABLOY ACADEMY training participant information	<p>A. Identification data</p> <p>B. Company data</p> <p>C. Contact details</p> <p>As well as information related to course performance</p>	<b>Legitimate interest</b> to fulfil the rights and obligations under the customer contracts
Authorisation card personal data	<p>A. Identification data</p> <p>B. Company data</p> <p>C. Contact details</p> <p>F. Video and audio recordings</p> <p>As well as the following information related to the authorisation card:</p> <ul style="list-style-type: none"> <li>• Tax number of the person</li> <li>• Courses required for the authorisation card</li> <li>• Reason for applying for an</li> </ul>	<b>Legitimate interest</b> to fulfil the rights and obligations under the customer contracts

	<p>authorisation card</p> <ul style="list-style-type: none"> <li>• Previous employer, in case of an authorised locksmith</li> <li>• Copy of the security card</li> <li>• Validity of the authorisation card</li> </ul>	
<p>Customer representative contacts and dealings on the ABLOY CORE service portal, including:</p> <ul style="list-style-type: none"> <li>• Customer relationship management</li> <li>• Buying our services and products</li> <li>• Management and collection of payments for our products and services, debt collection</li> <li>• Providing customer benefits and customer service, including chat conversations and other customer communications</li> <li>• Managing the complaints process</li> <li>• Organising training courses</li> <li>• Issuance of authorisation cards</li> <li>• Managing access rights to order management software, service portals and other information systems</li> <li>• Processing, delivering and archiving orders</li> <li>• Management, support, and maintenance of the CORE service portal</li> </ul>	<p>A. Identification data</p> <p>B. Company data</p> <p>C. Contact details</p> <p>D. Transaction data</p> <p>G. Statements</p>	<p>Entering into a <b>contract</b> with you or taking action at your request before entering into a contract</p> <p>Compliance with <b>legal obligations</b> (accounting, auditing, and taxation)</p> <p><b>Legitimate interest</b> of the controller to fulfil its rights and obligations under customer contracts and orders placed through the CORE service portal</p>
<p>Consumer customer contacts on the ABLOY CORE service portal, including:</p>	<p>A. Identification data</p> <p>C. Contact details</p>	<p>Compliance with <b>legal obligations</b> (accounting, auditing, and taxation)</p>

<ul style="list-style-type: none"> <li>• Buying our services and products</li> <li>• Management and collection of payments for our products and services, debt collection</li> <li>• Processing, delivering and archiving orders</li> <li>• Providing customer service</li> <li>• Management, support, and maintenance of the CORE service portal</li> </ul>	D. Transaction data  G. Statements	<b>Legitimate interest</b> of the controller to fulfil its rights and obligations under customer contracts and orders placed through the CORE service portal
End customer contacts on the ABLOY CORE service portal and communication concerning the customer or services	A. Identification data  C. Contact details  D. Transaction data	<b>Legitimate interest</b> of the controller to fulfil its rights and obligations under the customer contracts

To the extent that the processing of personal data is based on our legitimate interest, we have carried out a legitimate interest balancing test. The purpose of the balancing test is to carefully weigh our interests against the rights and interests of data subjects, and to evaluate whether we are able to process personal data lawfully on this legal basis. If you would like more information about the balancing tests we have carried out, you can contact us using the contact details in section 1.

#### 4. SHARING COLLECTED DATA

We may share your personal data to third parties in the following circumstances:

- When necessary for the purposes listed in section 3.
- To public authorities, tax authorities or enforcement authorities, or as otherwise required by law.
- To an audit firm for the purposes of carrying out an audit.
- When you pay on our website, your payment is managed by a payment service provider acting as an independent data controller.
- Your information may be shared with a person or entity that acquires all or most of our company, shares, or assets, or with whom we are merging.
- When we believe in good faith that disclosure is necessary to exercise our rights or defend against legal claims, protect your safety or the safety of others, investigate fraud, or respond to a government request.
- To service providers we appoint to provide us with the services we need for export control and sanctions screening and related services.

We may share your information within the ASSA ABLOY group where necessary to fulfil the purposes set out above. This processing is based on our legitimate interest to transfer data within the group for internal purposes. Such internal purposes include, but are not limited to, the use of a centralised IT system and the alignment of business and its strategies.

We share information, including personal data, with trusted third-party service providers. These service providers provide us with services for processing personal data and process



personal data on our behalf and based on our instructions. Such services include, for example, marketing automation and customer management system providers, customer relationship management service providers, sales presentation tool providers, sales service providers, website maintenance and content maintenance services, debt collection service providers, auditing service providers, product delivery service providers, marketing service providers, distributors, and other similar partners. Third-party service providers may have access to or the ability to process personal data in order to provide the above services to us. Third parties may not use your data for purposes other than those related to the services they provide. We have entered into data processing agreements with these third parties.

## **5. DATA TRANSFERS TO THIRD COUNTRIES**

We will not transfer your data to countries outside the European Union or the European Economic Area unless we have verified that the transfer meets the requirements of Chapter V of the GDPR.

Some of the third-party service providers we use are located outside the European Economic Area. For software support purposes, the personal data contained in support requests is available to ASSA ABLOY EMEA software support in Poland and India. In addition, the content of websites (e.g., [www.abloy.com](http://www.abloy.com) and [www.abloy.fi](http://www.abloy.fi)) and the personal data processed in forms and marketing tools on the websites are accessible by ASSA ABLOY's partner in India to the extent necessary for the provision of the services. The data of the Abloy.com website is also processed by local Abloy sales companies in the following countries or by ASSA ABLOY companies in their respective territories: Australia, Canada, England, Spain, China, Kazakhstan, Latvia, Lithuania, India, Poland, France, Singapore, South Africa, Czech Republic, Turkey, Ukraine, United States and Estonia. To ensure that your personal data is adequately protected, we have ensured that in such situations adequate safeguards are in place to ensure secure transfers. Such safeguards include, for example, adequacy decisions of the European Commission or standard contractual clauses specifically approved by the Commission. These measures are deemed to give the data an equivalent level of protection as they enjoy in the EEA.

If you would like more information about the processors of your personal data established outside the European Economic Area and the security measures we have taken to ensure the continuity of data transfers, you can contact us at using the contact details in section 1.

## **6. RETENTION PERIODS**

We will retain the collected personal data for as long as we have a continuing legal basis for such retention. When the basis for processing ends, we will delete or anonymise your personal data.

Data collected for marketing purposes will be deleted from the register after the person has withdrawn their consent. The consent will be valid for a maximum of six (6) years and will expire when you withdraw it. In the case of an inactive email address in the marketing register, personal data will be retained for a maximum of one (1) year.

For data necessary for the use of the services, the data will be retained for a maximum of five (5) years from the date of the last purchase of products or services by the customer.

In the case of customer feedback containing personal data, the data is stored for as long as necessary for the purpose for which it was collected, i.e., to process the feedback provided by the customer. The feedback will be deleted once necessary action has been

taken as a response and the customer has been given a reasonable time to respond to any contact made with them.

Identification data, contact details and transaction data related to the customer relationship are retained for the duration of active cooperation. After the end of active cooperation, Abloy will retain the personal data in the register for as long as the data is needed for the purpose for which it was collected, or for as long as required by applicable law.

In the ABLOY CORE service portal, the Customer representative's identification data, contact details, and transaction data are retained by Abloy for the duration of active cooperation and thereafter Abloy retains the personal data in the register for as long as the data is required for the purpose for which it was collected, or for as long as required by applicable law.

For consumer customers, Abloy will retain data about the product complaint process regarding Yale products for as long as the data is needed for the purpose for which it was collected, or for as long as required by applicable law. For end customers, Abloy will retain data about the end customer for the duration of the contract or until the representative deletes the information.

Chat conversations on the ABLOY CORE service portal are retained for one (1) year after the chat conversation has been closed.

The personal data on the authorisation card issued by Abloy to an employee of an authorised locksmith will be kept for three (3) calendar years after the expiry of the last authorisation card. Data regarding requests for an authorisation card will be retained for six (6) months from the date of closure of the processed authorisation card request.

Identification data, contact details, and transaction data of consumer customers and private persons in connection with a complaint process regarding a Yale product will be retained for as long as the data is needed for the purpose for which it was collected, or for as long as required by applicable law. Customer representative data related to the ONESHOP online store will be retained for the duration of active use of the online store. Log data relating to the optimisation, administration, support and maintenance of the online store will be retained for as long as the data is needed for the purposes for which it was collected or for as long as required by applicable law.

For promotional games or other draws, identification data will be retained until the prize is delivered.

Online store customer data in connection with the Yale personnel online store is retained for as long as the data is needed for the purpose for which it was collected, or for as long as required by applicable law.

Data may also be retained for longer periods if we are under a legal obligation to retain the data or if retention is necessary for the establishment, exercise or defence of legal claims in legal proceedings.

For references and reference stories, we retain the data for as long as the reference agreement is in force.

Personal data collected for export control and sanctions screening purposes will be retained for as long as necessary to ensure compliance with applicable export control and sanctions laws and as required by law.

## **7. HOW CAN YOU EXERCISE YOUR DATA PROTECTION RIGHTS?**

You have several different rights in relation to your personal data. Below you will find a summary of these rights and information on how you can exercise these rights and the restrictions that apply to these rights.

If you meet certain conditions, you have the right to:

- Request access to your personal data. This right allows you to obtain a copy of any personal data we retain about you and to ensure that we are processing that data lawfully.
- Request for your personal data to be rectified. This right allows you to ask us to rectify information about you that is incomplete or incorrect.
- Request for your personal data to be erased. This right allows you to ask us to erase your personal data when there is no longer an appropriate legal basis for processing.
- Object to the processing of your personal data where there is a legitimate interest on our (or a third party's) part and you have a ground for objecting to the processing based on a particular personal situation. In addition, you always have the right to object to the processing of your personal data for direct marketing purposes.
- Request to restrict the processing of your personal data. This right allows you to ask us to stop processing your data, for example, for a period of time so that you can verify the accuracy of the data or the basis for processing.
- Request the transfer of your personal data from one system to another.
- If the processing is based solely on your consent, you have the right to withdraw that consent at any time. However, withdrawal of consent does not affect the lawfulness of the processing of personal data carried out on the basis of consent before the withdrawal of consent.

If you wish to exercise any of the above rights, you can contact us using the contact details provided in section 1. Following your contact, we will carry out your request as required by law.

You have the right to notify the national data protection authority if you are dissatisfied with the way we process your personal data. In Finland, you can notify the Office of the Data Protection Ombudsman at <https://tietosuoja.fi/en/notification-to-the-data-protection-ombudsman>.

## **8. CHANGES TO PRIVACY POLICY**

This privacy policy may be updated as necessary to reflect changing legal and operational requirements. We recommend that you visit our website regularly to be informed of our updated privacy policy.

In the event of significant changes to this privacy policy, registered customers will be informed of the changes by email before they take effect.

Date of drafting of the privacy policy: 21.5.2018

The privacy policy has been updated on 27.8.2020, 15.10.2020, 31.3.2021, 25.8.2022, 3.10.2022, 30.12.2024.