

PRIVACY STATEMENT	FOR-TITU-002	<b>forchem</b> RESPOL GROUP
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## FOR-TITU-002 PRIVACY STATEMENT

### 1 THE PROCESSING OF PERSONAL DATA

Forchem Oyj (hereinafter referred to as “Forchem”) is dedicated to protecting personal data and privacy. It is important for Forchem that all personal data received during the course of daily operations will be protected. The processing of personal data is carried out according to the provisions of Finnish data protection laws and General Data Protection Regulation (Regulation (EU) 2016/679). The directions and recommendations of the Finnish Data Protection Ombudsman are also taken into consideration. The aim of this Privacy Statement is to explain why Forchem collects personal data and to provide information on how to contact Forchem with regard to any questions about the collecting of personal data.

### 2 CONTROLLER

Forchem Oyj  
Business ID: 2512058-6  
P.O. Box 16, FI-26101  
Rauma, Finland  
Visiting address: Maanpäätie 3, 26820 Rauma, Finland

### 3 CONTACT PERSON IN MATTERS CONCERNING THE REGISTER

Nora Koivu, Assistant to the Directors  
Phone: +358 44 7317 211  
E-mail: [nora.koivu@forchem.com](mailto:nora.koivu@forchem.com)

### 4 THE PURPOSE OF COLLECTING AND PROCESSING OF PERSONAL DATA

Personal data means information that allows the identification and contacting of the individual. The majority of personal data is provided voluntarily or on a contractual basis. If you decide not to provide personal data, Forchem may not be able to provide all services available or cannot provide services at all.

Personal data in the Register is mainly collected on the grounds of client relationship, employer obligations and partnership. In addition, using the websites and other social media or contacting Forchem provides Forchem with personal data, such as name, address phone number and e-mail address. The access control system used in Forchem premises may also store personal data about visitors. Forchem may occasionally receive personal data from superiors or colleagues as well.

Depending from the source of information, website, social media channel, service, application or other context of usage the information may be used for:

- making announcements
- customer service and operational development
- fulfilling contractual and public authority requirements
- compilation of statistics and education
- controlling the security of Forchem premises
- observing user activity on the websites
- developing user experience on the websites

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The processing of personal data carried out by Forchem is based on consent and complying with the requirements provided by law. The purpose of processing personal data is to protect client interests as well as legitimate interests of Forchem. These interests of Forchem are, including but not limited to, ensuring the safety of the data system and operational environment, developing product and service quality, company management and marketing.

## 5 YOUR RIGHTS RELATED TO DATA

### Right of access

You are entitled to obtain information as to what personal data is being processed in the Register. Right of access may be denied under conditions provided for by law. As a principal rule, right of access shall be provided for free.

### Right to restriction of processing

You are at any time entitled to deny the processing of personal data or ask the processing of personal data to be restricted provided that Forchem does not have reasonable grounds for processing personal data. However, please note that the right to restrict the processing shall not apply where the processing of personal data is necessary due to mandatory or statutory requirements.

### Right to erasure ('right to be forgotten')

You are entitled to the rectification of inaccurate personal data, the completing of incomplete personal data and the erasure of personal data concerning you. However, right to erasure shall not apply where the processing and storing of personal data is necessary due to mandatory statutory requirements.

### Right to data portability

Provided that certain conditions are met, you are entitled to receive your personal data which you have provided to us and to transmit this data to another controller.

### Right to opt out of direct marketing

You are at any time entitled to object the processing of personal data concerning you for direct marketing.

### Right to lodge complaint

You are entitled to lodge a complaint with the competent supervisory authority if you feel that Forchem has not appropriately followed the applicable data protection rules and regulations.

### Other rights

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Provided that the processing of personal data is dependent on your consent you are entitled to revoke the consent at any time. The revoking of consent is done by way of notifying the controller as specified in section 6.

## 6 CONTACTING FORCHEM

All communication and requests concerning your rights related to data must be of a written form or be sent by e-mail to the address specified in section 3.

Forchem may ask you to specify the request and to verify your identity before processing the request. Forchem may refuse to fulfil the request provided that such refusal is based on applicable law.

Forchem shall provide the information within one month of receipt of the request. The period may be extended only on specific reasons.

## 7 CATEGORIES OF PERSONAL DATA

Information about the company's and its subcontractors' personnel, contact persons of clients, companies and partners as well as users of the Forchem website may be stored in the Register. The data collected may vary depending on the method of communication, choices you have made regarding privacy settings and the applications used. Forchem may collect and process, including but not limited to, following information:

- Name and title of the person (data subject)
- Contact information (phone number and e-mail address)
- Name, contact information and line of business of the company
- Information regarding online behavior
- Information stored based on technical surveillance
- Technical information and information regarding cookies

## 8 ACCESS TO PERSONAL DATA

In Forchem, the processing of personal data is limited so that only appropriate staff members, based on their role and duties in the company, have access to personal data. The marketing and sales professionals have access to personal data in matters regarding client relationship, whereas other administrative personnel have access to personal data in matters related to employment, contracts and transactions.

## 9 COOKIES

Forchem uses cookies on its websites. Cookies are small text files stored in the computer or other device of the user. Cookies do not harm the device.

Cookies may be disabled in browser settings. However, disabling cookies might affect the websites in that they slow down or that access to them is denied.

## 10 DISCLOSURE AND TRANSFER OF PERSONAL DATA

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Forchem may use subcontractors and service providers to assist with maintenance of the production line, customer service, administrating and analyzing user information, research, client communication and campaigns. Personal data may be disclosed or transferred to subcontractors and service providers but only to the extent that these parties are involved in production or administrative processes of Forchem.

Third parties are not allowed to use personal data for purposes other than those mentioned in this Privacy Statement or specifically defined by Forchem. It is required of these third parties that personal data remains confidential and that adequate measures are taken to ensure protection and privacy of personal data disclosed or transferred.

Personal data may be processed by third party service providers. Provided that the service provider has access to personal data from outside the EU or EEA area, Forchem ensures that the processing is carried out in an appropriate manner and according to applicable data protection laws.

Personal data may be disclosed or transferred to authorities as requested for by competent authorities or by law.

## 11 DURATION OF PROCESSING PERSONAL DATA

Forchem stores personal data only to the extent that it is necessary for the attainment of purposes specified in this Privacy Statement. Personal data may be stored longer where required for by applicable law.

Forchem has taken adequate measures to ensure all personal data is relevant by way of deleting unnecessary information and updating personal data. Information in the Register is stored as it is received and updated Forchem is notified about the changes in personal data.

## 12 AUTOMATED DECISION-MAKING AND PROFILING

Profiling means automated processing of personal data to assess the characteristics of individuals. Forchem does not use personal data for automated decision-making or profiling.

## 13 CHANGES TO PRIVACY STATEMENT

Forchem may change this Privacy Statement as the services and operations develop. Changes may also occur due to changes in the regulatory framework. Any changes will be announced on the websites or in another appropriate manner. Forchem recommends everyone to review the latest Privacy Statement on a regular basis. In addition, this policy is part of ISO management documentation and is reviewed accordingly.

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Version	Date	Change
4	15.02.2024	Periodic inspection, no changes