

Grano's data protection policy

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Revision history

version	date	revised by and description
0.9	18 February 2021	PH, initial version submitted for commenting
0.9.1	8 March 2021	PH, first round of revisions based on comments
0.9.2	18 March 2021	Revised version by an external expert
0.9.3	18 March 2021	PH revised version
0.9.4	22 March 2021	PH revised version, revisions approved
0.9.5	24 March 2021	TL revisions
1.0	25 March 2021	Board, first approved and published version
1.0.1	7 May 2021	Fixes for translation

Data protection policy

Introduction

Data protection is part of Grano's risk and continuity management and responsible operating principles. This data protection policy defines how the lawful processing of personal data and a high level of data protection are ensured in all the functions and countries of operation of the Grano group (hereinafter Grano).

The scope and objectives of the data protection policy

Data protection encompasses the protection of private life and other rights concerning the protection of privacy in the context of the processing of personal data.

The purpose of this data protection policy is to safeguard the personal data of Grano's customers, employees and other stakeholders and to ensure that the obligations of processors are complied with.

The aim of Grano's data protection principles is to ensure that personal data is

- processed lawfully, appropriately and transparently from the perspective of the data subject
- collected and processed for specific, explicit and lawful purposes
- collected only to the extent necessary for the purpose of processing
- updated whenever necessary: inaccurate and incorrect personal data must be deleted or corrected without delay
- stored in a form that makes the data subject identifiable only for as long as is necessary for the purpose of the processing
- processed confidentially and securely.

Data life-cycle and use

The processing of personal data is based on the consent of the data subject or some other basis defined in legislation. Personal data are only processed for justifiable purposes and only to the extent and as long as necessary for the specified purpose. Every effort is made to ensure the correctness of processed data, and the data is updated based on information received from the data subject themselves or reliable sources. Once storing the data is no longer necessary for the specified purpose of processing, the data are appropriately destroyed.

Data are used for the purposes described during their collection within the boundaries of relevant laws and regulations. Data are disclosed only for specified reasons or reasons mentioned in legislation and only to specified recipients or recipients defined in legislation. Data may be transferred out of the country in which the controller is located, provided that there is a legitimate reason for the transfer and that it is

allowed by relevant legislation. Any data transfers are carried out in compliance with procedures defined in the legislation of the relevant countries, where applicable.

Informing of the data subjects

The controller is a company that is a part of Grano and for whose purposes the personal data is collected. The controller prepares the documentation necessitated by legislation for each personal data file. The data subjects are provided with the information defined in legislation or other necessary information regarding the processing of their personal data during collection and by other means, where possible, such as via the controller's website, for example.

Responsibilities and organisation

The parties responsible for the realisation of data protection are the management team and business management. All personnel must be aware of and manage the data protection regulations relevant to their areas of responsibility and related risks. Grano has a dedicated data protection team that steers and develops the realisation of data protection principles and provides guidance on data protection matters.

At Grano, the unit that owns the data is responsible for its protection, even when the processing of the data is outsourced. When the processing of data is outsourced, the relevant unit is responsible for ensuring that the chosen partner complies with this data protection policy. The outsourcing of the processing of personal data is always subject to a written agreement that defines the responsibilities and obligations of the parties.

Ensuring data protection

Data protection matters are part of the orientation of new employees, in addition to which all employees are provided with regular data protection training.

New employees complete a training unit on data protection as part of their orientation. After this, the training is completed once a year. The completion rate of the training is monitored and a register is maintained of its completion.

All persons who process personal data are bound by professional secrecy as defined by legislation or separately agreed upon and documented. Grano's entire personnel have signed non-disclosure agreements.

Access to information systems that contain personal data is controlled with Grano's user management solution or by other documented methods. Grano maintains access logs the level of detail of which is separately defined in legislation or that are otherwise sufficiently detailed for all personal data files.

Procedure in the event that data protection is compromised

We consider conduct that compromises data protection to include all actions that violate legislation concerning the processing of personal data, the EU's General Data Protection Regulation, this data protection policy and the instructions issued based thereon. Any conduct that compromises data protection that in our assessment meets the criteria for punishable conduct will be reported to the authorities for further investigation. If the conduct does not meet the aforementioned criteria, but still compromises data protection, the conduct can be used as grounds for a reprimand, a warning or termination of employment or contract.

If data protection is suspected or found to have been compromised, the matter is investigated, the risks are assessed and the data protection incident is documented without delay. Furthermore, the matter is communicated without undue delay to the data subjects whose data protection was compromised, provided that this communication is necessary for carrying out remedial actions or limiting the damage. Every controller must assess and oversee the realisation of data protection in their own operations.

Communication with personnel, data subjects and stakeholders

This data protection policy and any changes thereto are communicated to Grano personnel via the company intranet. Grano also issues internal instructions concerning data protection matters. The currently valid data protection policy is also published on the grano.fi website. The data protection policy is reviewed annually.