

This general privacy policy describes how Snellman Group processes personal data of the users of its online services and other individuals connected to Snellman Group (“Data Subject”), the principles for personal data processing and the rights of the Data Subject with respect to their personal data.

Snellman Group processes personal data in accordance with this privacy policy, good data management and data processing practices, applicable national data protection legislation and the General Data Protection Regulation of the EU (EU 2016/697). We kindly ask you to read this privacy policy carefully.

1. Joint controllers

This privacy statement applies to all Snellman Group companies in Finland that act as joint controllers when processing personal data as part of their online services and customer service. Joint controllers include the following Snellman Group companies:

- a) Name: Oy Snellman Ab
Business ID: 0181676-5
Address: Kuusisaarentie 1, 68600 Pietarsaari
Telephone: +358 6 786 6111
Email: tietosuoja@snellman.fi

- b) Name: Snellmanin Lihanjalostus Oy
Business ID: 2212340-7
Address: Kuusisaarentie 1, 68600 Pietarsaari
Telephone: +358 6 786 6111

- c) Name: Snellmanin Kokkikartano Oy
Business ID: 1554059-5
Address: Jäspilänkatu 27, 04250 Kerava
Telephone: +358 6 786 6111

- d) Name: Figen Oy
Business ID: 2126615-8
Address: Pykärintie 15, 62395 Petterinmäki
Telephone: +358 6 786 6111

- e) Name: Snellman Petfood Oy
Business ID: 3580283-9
Address: Kuusisaarentie 1, 68600 Pietarsaari
Telephone: +358 6 786 6111

Party (a) is hereinafter referred to as the “**Parent Company**” and Parties (b) to (e) are hereinafter referred to as the “**Subsidiaries**”. The Parent Company and the Subsidiaries are hereinafter collectively referred to as “**Snellman**”.

2. Contact details of Snellman Group’s data protection officer

Company: Oy Snellman Ab
Name: Rose Lindell
Telephone: +358 40 680 9020
Email: tietosuoja@snellman.fi

3. Roles of joint controllers in the processing of personal data

The Parent Company and the Subsidiaries act as joint controllers when processing personal data as part of their online services and customer service. The Parent Company sees to the general

guidelines and principles governing online services and customer service and supervises the operation of the websites. The Parent Company ensures that the processing of personal data carried out by Snellman complies with data protection legislation and Snellman's general data protection guidelines.

The Subsidiaries are responsible for the processing of personal data for the purpose of developing and marketing their own operations, products and services.

4. Purposes and legal basis of personal data processing

Snellman processes personal data for the purpose of improving product safety and satisfaction with the products as well as for the purpose of business development. This includes collecting and responding to customer feedback and any complaints. The processing is based on Snellman's legitimate interest based on a factual connection between Snellman and the Data Subject emerging when the Data Subject buys Snellman's products or is interested in or otherwise interacts with Snellman.

Snellman processes personal data for direct marketing purposes when the Data Subject subscribes to Snellman's newsletter or orders other marketing material. The processing of personal data for direct marketing purposes is based on the consent of the Data Subject when the marketing is targeted at consumers. We may carry out direct marketing to organisations (such as retail stores), unless the organisation in question has specifically prohibited this.

Subject to the Data Subject's consent, we may also collect personal data through Snellman's online services about the Data Subject's use of the online services. For more information on the use of cookies, see section 10 below.

5. Data content of the register

Snellman processes only the personal data that is necessary and essential for each processing event. Snellman processes the following categories of personal data, for example:

- **Personal identification and contact information:** Data Subject's first and last name, postal address, e-mail address and telephone number.
- **Feedback and complaints:** information about the Data Subject's feedback and complaints, including any photo attachments
- **Consents given by the Data Subject:** consent to or prohibition on direct marketing and the use of cookies
- **Information collected through cookies:** IP address, terminal device, operating system, browser type, time, web address from which the Data Subject came to the website, time spent on the site, language settings

6. Data retention period

Snellman processes personal data only for as long as necessary for the purpose of the processing and only to the extent required.

Personal data shall be stored as follows:

- a) Customer feedback and complaints, as well as personal data processed as a result of them, is deleted 12 months after the submission of the feedback or complaint, if the matter is not pending or otherwise requires further investigation.
- b) Direct marketing data will be processed until the Data Subject wishes to cancel the subscription.
- c) Personal data may be retained on the basis of Snellman's legitimate interest for as long as this is necessary to protect Snellman's legitimate interest. The retention periods will then be

based on the duration of the pending official or other legal proceedings, as well as on the time limits for bringing actions and statute of limitations under the relevant legislation.

7. Regular sources of information

Snellman collects personal data only from the Data Subjects themselves when they use Snellman's online services (website forms) or in connection with other transactions by telephone or e-mail. Calls may be recorded to improve customer service.

8. Recipients of personal data and regular disclosure of information

The personal data of the Data Subject is processed by those Snellman employees who have a need to process personal data to carry out their duties. Personal data may be transferred inside Snellman on the basis of a legitimate interest.

In certain circumstances, Snellman may disclose personal data to third parties. For example, Snellman may use third-party service providers to process personal data on Snellman's behalf and in Snellman's name. In these situations, we will properly ensure that the processing of personal data is carried out in accordance with Snellman's data protection practices and in accordance with the agreements concluded with the service providers.

Snellman may disclose personal data in connection with a possible business acquisition.

9. Transfers of personal data outside the EU or the European Economic Area

As a rule, we process personal data within the EU/EEA. However, we may transfer personal data outside the EU/EEA when a third-party service provider used by Snellman operates wholly or partly outside these territories. In these cases, we always ensure the legality of the transfers by complying with the standard contractual clauses adopted by the EU Commission and by ensuring that an adequate level of data protection is guaranteed in the third country.

10. Use of cookies

We use cookies on our website. A cookie is a small text file that is sent to and stored on the user's computer, which allows the webmaster to identify frequent visitors to the site, to make it easier for visitors to log on to the site, and to enable the creation of aggregate information about the visitors. This feedback enables us to continuously improve the content of our website. Cookies do not harm users' computers or files. We use them in a way that enables us to provide our customers with information and services that meet their individual needs. Please note that cookies may be necessary for the proper functioning of some of the pages we maintain and the services we provide. We have the right to store cookies on your device if absolutely necessary for the operation of the website. We always ask for your consent to the use of non-essential cookies. You have the right to withdraw your consent at any time.

11. Security of the register

Your information is stored on Snellman's own or our service provider's servers, which are protected in accordance with standard industry practices. Access to personal data is protected by a firewall and user-specific user IDs, user rights and passwords. The personal data collected and processed by Snellman will be kept confidential, and only Snellman employees who need the data for their duties will have access to the data.

12. Automated decision making

Automated individual decisions such as profiling (Article 22 of the EU General Data Protection Regulation) are not made.

13. Data Subject's rights

Privacy policy

Snellman Group's general privacy policy

The Data Subject has the right to access their personal data and to check what data concerning them has been stored in the personal data file. The Data Subject has the right to request rectification of inaccurate or outdated information and to request its completion. The Data Subject may request the erasure of their personal data in situations pursuant to Article 17 of the EU GDPR and the transfer of data from one system to another. They also have the right to restrict or object to the processing of their data in accordance with Articles 18 and 21 of the EU GDPR.

The Data Subject has the right to withdraw their prior consent to the processing of their data at any time. The Data Subject may withdraw their consent to direct marketing in connection with each direct marketing message.

The Data Subject is requested to submit requests concerning the Data Subject's rights by e-mail to Snellman's data protection officer (tietosuoja@snellman.fi).

If the Data Subject considers that Snellman's processing of personal data violates the EU GDPR or other provisions on data protection, the Data Subject has the right to lodge a complaint with the supervisory authority (the [Data Protection Ombudsman](#) in Finland) concerning the processing of their personal data.

14. Other

Snellman may update this privacy policy as our operations evolve or legislation changes.

Privacy policy

Snellman Group's general privacy policy