

# Privacy Policy

On this page, you can familiarise yourself with Juustoportti's privacy policies concerning its customer and marketing register, job applicant register, and customer feedback register .

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## Privacy policy: 20.8.2024

20.8.2024 Updated the wording of the privacy policy to reflect current systems.

17.6.2021 Updated the privacy policy to include a statement regarding the social media management system.

May 8, 2018 Created

This document contains privacy statements for the systems used by Juustoportti to store information about customers, corporate customers, and stakeholders. Information on corporate customers is stored for the purposes of daily business operations, as well as for contact and marketing purposes. Consumer customer data is processed and stored for the purpose of processing customer feedback and for marketing purposes.

## Data protection statement for the enterprise resource planning system

### Data controller

Juustoportti Oy

Business ID: 2065563-7

Meijeritie 3, 61600 Jalasjärvi

In addition, the following companies belonging to the Juustoportti Group act as joint controllers where applicable:

Juustoportti Food Oy, Business ID 2104605-9

Juustoportti ILO Oy, Business ID 0957083-5

Kasvis Galleria Oy, business ID 1527898-8

### Data processors

Data is processed by employees of the group whose work requires the use of the data in question. Access to data is restricted in the systems by means of user IDs and access rights. In addition, the data is accessible to employees of system suppliers and other partners who work on development or maintenance work necessary for the project.

### Purpose and grounds for processing personal data

The purpose of processing personal data is to manage the business operations of Juustoportti Oy (2065563-7) and its subsidiaries, in particular Juustoportti Food Oy (2104605-9), Juustoportti ILO Oy (0957083-5), and Kasvis Galleria Oy (1527898-8), as well as the order delivery process. Orders, invoicing, and accounting are created in the system. Only customers registered in the system can place orders. In addition, the data is used to communicate with corporate customers.

The grounds for processing are:

- Consent of the data subject: The data is obtained either directly from the customer or from central retail organisations, which transfer the information responsible for the operations to the system. The data

stored for communication purposes is stored on the basis of consent related to the agreed operating method or separately requested consent.

- Billing and the storage of bank details are necessary for the performance of the contract. Orders cannot be delivered or invoiced without billing information.
- The processing of data is necessary to safeguard the legitimate interests of the controller, such as the right to invoice for goods delivered.

The processing of personal data does not include automated decision-making or profiling.

## Data to be registered and retention period, description of sensitive information and justification

The register only contains information on companies and individuals, including their contact details, who are current or potential customer companies of the Juustoportti Group's food business or contact persons for those companies.

Information related to customer relationships and sales promotion may be stored about the data subject, for example:

- Company name for billing purposes
- Name of the person as a reference or contact person for managing the customer relationship
- The person's role for the purpose of targeting potential contacts or responsibilities
- The person's phone number for contact purposes
- The person's email addresses
- The system does not contain any sensitive information

The information is stored for the duration of the customer relationship and the customer's existence in the case of corporate customers. Personal data is stored until new contact details are obtained or until their deletion is requested, and there is no obstacle to the deletion of the data that would jeopardize any aspect of the agreement.

## Regular sources of data

The collection of registered data is based on the customer relationship or other connection to the Juustoportti Group. The data in the register is collected at different stages of the customer relationship. Data concerning the data subject is typically obtained from the person themselves or from the data subject's employer as follows:

- Central retail organisations provide their suppliers with up-to-date information on their retailers in accordance with the agreed procedure.
- The customer order portal, through which customers can order products, stores order information in the system. Access to the ordering system is managed with user IDs.

Personal data may also be purchased for one-time marketing use from registers outside the Juustoportti Group and collected from public sources.

## Technical and organizational measures for the protection of personal data

Personal data is stored in a server environment that can only be accessed by persons performing necessary maintenance and development tasks. Interactions with the systems is restricted by technical means to only those necessary for operations.

Access to the systems is granted using personal user IDs, and rights within the system are granted on the basis of roles only for functions that are essential to operations. Exporting data from the system is prohibited.

The system collects log data, which can be used by the system administrator and supplier to investigate any actions taken. Maintaining log data is important for ensuring the integrity of the system and tracing any problems that may arise. The system controls the data used in the company's statutory tasks, so the data must be traceable and trackable.

## Verification and accuracy of personal data, and deletion and disclosure of data

Personal data is checked regularly in connection with invoicing and communications. In addition, central retail organisations automatically send updates to contact persons' contact details, on the basis of which the data is stored in the system and old data is deleted. The accuracy of personal data in the system is ultimately determined by the person entering the data, but the sender is responsible for the accuracy of the data they send.

If personal data stored in the register is to be deleted and its deletion does not jeopardize any interests agreed upon in a contract or otherwise protected, the data will be deleted from the system at the separate request of the data subject or a person authorized by the customer. Data will also be deleted if it is found to be incorrect or when a person leaves the customer's service and the data reaches a person within the Juustoportti Group who maintains the data.

The data will not be disclosed to third parties. Data can be transferred from the enterprise resource planning system via an interface, but personal data will not be transferred outside the system.

The data will not be transferred outside the EU.

## Other rights of the data subject

If they wish, the data subject may request more detailed information about the register or its maintenance via the contact form on Juustoportti, as described at the end of the privacy policy. Persons outside the group are not granted access to the system for the purpose of checking data.

## Risk assessment

The data recorded is not sensitive, and the telephone numbers are owned by the corporate customer.

The risk of data leaks is minimized through both technical and administrative measures. At Juustoportti, system development and procurement are guided by defined cybersecurity processes, which suppliers are also required to comply with. Juustoportti also regularly audits the security of its systems and network environments.

To manage risk, the system can only be accessed with personal user rights, and access to the server on which the system is located is restricted.

## Customer data register privacy policy

### Register controller

Juustoportti Oy

Business ID: 2065563-7

Meijeritie 3, 61600 Jalasjärvi

Tel. 06-4566800

In addition, the following companies belonging to the Juustoportti Group act as joint controllers where applicable: Juustoportti Food Oy, Business ID 2104605-9

Juustoportti ILO Oy, Business ID 0957083-5

Kasvis Galleria Oy, Business ID 1527898-8

## Data processors:

Data is processed by employees of the group whose work requires the use of such data. Access to data is restricted in the systems by means of user IDs and access rights. In addition, the data is accessible to employees of system suppliers and other partners working on development or maintenance tasks necessary for the project.

## Purpose and grounds for processing personal data

The purpose of processing personal data is for Juustoportti Oy (2065563-7) and its subsidiaries, in particular Juustoportti Food Oy (2104605-9), Juustoportti ILO Oy (0957083-5) and Kasvis Galleria Oy (1527898-8)) to engage in customer contact, marketing, sales, service quality development, customer relationship management, and customer communication.

The basis for the processing of personal data is legitimate customer relationship management in terms of marketing. Based on their consent, registered persons are sent customer satisfaction surveys and electronic direct marketing messages.

The specific grounds for processing are as follows:

- Consent of the data subject: The data is obtained either directly from the customer or from central retail organisations, which send personal data concerning the persons responsible for the operations to the system. The data stored for communication purposes is stored on the basis of consent related to the agreed procedure or on the basis of separately requested consent.

The processing of personal data does not include automated decision-making or profiling.

## Data to be registered and data retention period, description of sensitive data and justification

The register only contains information on companies and individuals with contact details who are current or potential customer companies of the Juustoportti Group's food business or contact persons for those companies.

Information related to customer relationships and sales promotion may be stored about the data subject, for example:

- A company name for communication and sales targeting
- A person's name for reference or as a contact person for customer relationship management
- The person's role for targeting potential contacts or responsibilities
- The person's phone number for contact purposes
- Customer history (e.g., contacts with/from the customer, service changes, representative visits, campaigns)
- Information related to marketing and sales promotion, such as targeted marketing measures and participation in them (e.g., participation in events)
- Targeted marketing measures and participation in them (e.g., participation in events)
- The system does not contain any sensitive data

Personal data recorded in the register is checked regularly and deleted when there is no legal basis for its storage.

## Regular sources of data

The collection of data subjects' data is based on a customer relationship or other connection to the Juustoportti Group. The data in the register is collected at different stages of the customer relationship. Data concerning the data subject is regularly obtained from the person themselves or from the data subject's employer as follows:

- Central retail organisations provide their suppliers with up-to-date information on their merchants in accordance with the agreed procedure.
- Information available from public sources, such as company websites

Personal data may also be purchased for one-time marketing use from registers outside the Juustoportti Group and collected from public sources.

## Regular disclosure of data

Data may be transferred within the Juustoportti Group.

## Technical and organizational measures for the protection of personal data

Personal data is stored in a server environment that can only be accessed by persons performing necessary maintenance and development tasks. Interactions with the systems are restricted by technical means to only those necessary for operations.'

Access to the system is granted with personal user IDs, and rights within the system are granted on a role basis only for functions that are essential for operations. Exporting data from the system is prohibited.

The system collects log data, which can be used by the system supplier to investigate any actions taken. Maintaining log data is important for ensuring the integrity of the system and for tracing any problems that may arise. The system controls the data used in the company's statutory tasks, so the data must be traceable and trackable.

## Verification and accuracy of personal data, and deletion and disclosure of data

Personal data is checked regularly when contact is made. In addition, central retail organisations automatically send updates to contact persons' contact details, on the basis of which data is stored and old data is deleted. The accuracy of personal data in the system is ultimately determined by the person entering the data, but the sender is responsible for the accuracy of the data received.

If personal data stored in the register is to be deleted and its deletion does not jeopardize any interests agreed upon in a contract or otherwise protected, the data will be deleted from the system at the separate request of the data subject or a person authorized by the customer. Data will also be deleted if it is found to be incorrect or if the person leaves the customer's service and the data reaches a person in the Juustoportti Group who maintains the data.

Data may be disclosed within the Juustoportti Group, but will not be disclosed to external parties.

The data will not be transferred outside the EU.

## Other rights of the data subject

If they wish, data subjects may request more detailed information about the register or its maintenance from Juustoportti via the contact form, as described at the end of the privacy policy. Persons outside the group will not be granted access to the system for the purpose of checking data.

## Risk assessment

The data recorded is not sensitive, and the telephone numbers are owned by the corporate customer.

The risk of data leaks is minimized through both technical and administrative measures. At Juustoportti, system development and procurement are guided by defined cybersecurity processes, which suppliers are also required to comply with. Juustoportti also regularly audits the security of its systems and network environments.

To manage risk, access to the system is restricted to personal user rights, and access to the server on which the system is located is limited.

## Mass communication system privacy policy

### Data controller

Juustoportti Oy

Business ID: 2065563-7

Meijeritie 3, 61600 Jalasjärvi

Tel. 06-4566800

In addition, the following companies belonging to the Juustoportti Group act as joint controllers where applicable:

Juustoportti Food Oy, business ID 2104605-9

Juustoportti ILO Oy, business ID 0957083-5

Kasvis Galleria Oy, business ID 1527898-8

Juustoportti Catering Oy, business ID 2104606-7

Station Juustoportti Oy, business ID 2102948-6

Juustoportti Käsämäki Oy, business ID 2808916-6

Juustoportti Kuopio Oy, business ID 2956859-9

### Data processors:

Data is processed by employees of the group whose work requires the use of such data. Access to data is restricted in the systems by means of user IDs and access rights. In addition, the data is accessible to employees of system suppliers and other partners working on development or maintenance tasks necessary for the project.

## Purpose and grounds for processing personal data

The purpose of processing personal data is for Juustoportti Oy (2065563-7) and its subsidiaries, in particular Juustoportti Food Oy (2104605-9), Juustoportti ILO Oy (0957083-5) and Kasvis Galleria Oy (1527898-8)), to engage in customer contact, marketing, sales, service quality development, customer relationship management, and customer communications.

The basis for the processing of personal data is legitimate customer relationship management in terms of marketing. Registered persons will be sent, on the basis of their consent customer satisfaction surveys and electronic direct marketing messages. The grounds for processing are as follows:

- Consent of the data subject: The data is obtained directly from the customer or from central retail organisations that send the personal data of persons responsible for operations into the system. The data stored for communication purposes is stored on the basis of consent related to the agreed operating method or separately requested
- The register may contain email addresses that have been collected, for example, at trade fairs, and to which the person has given their consent.

The processing of personal data does not include automated decision-making or profiling.

## Data to be registered and data retention period, description of sensitive data and justification

The register only contains information on companies and individuals, including their contact details, who are current or potential customer companies of the Juustoportti Group's food business or contact persons for those companies.

Information related to customer relationships and sales promotion may be stored about the data subject, for example:

- A company name for communication and sales targeting
- A person's name as a reference or contact person for customer relationship management
- The person's role for targeting potential contacts or responsibilities• The person's phone number and email address, for contact purposes
- Customer history (marketing messages sent to the data subject)
- Information related to marketing and sales promotion, such as targeted marketing measures and participation in them (e.g., participation in events)
- Targeted marketing measures and participation in them (e.g., participation in events)
- The system does not contain any sensitive data

Personal data entered in the register is checked regularly and deleted when there is no legal basis for its storage.

Each data subject also has the option to remove themselves from the mailing list by using the button provided in marketing communications to unsubscribe from the newsletter.

## Regular sources of data

The collection of data subjects' information is based on information collected from the data subjects themselves. Data concerning the data subject is regularly obtained from the person themselves or from the data subject's employer as follows:

- Primarily by participating in trade fairs, giving their consent to marketing communications and thus showing interest in Juustoportti's products
- By subscribing to the newsletter on Juustoportti's website

## Regular disclosure of data

Data may be disclosed within the Juustoportti Group.



## Technical and organizational measures for the protection of personal data

Personal data is stored in a server environment that can only be accessed by persons performing necessary maintenance and development tasks. Access to the systems is restricted by technical means to only those necessary for operations.

Access to the system is granted with personal user IDs, and rights within the system are granted on a role basis only for functions that are essential for operations. Exporting data from the system is prohibited.

The system collects log data, which can be used by the system supplier to investigate any actions taken. Maintaining log data is important for ensuring the integrity of the system and for tracing any problems that may arise. The system controls the data used in the company's statutory tasks, so the data must be traceable and trackable.

## Verification and accuracy of personal data, and deletion and disclosure of data

Personal data is checked regularly when contacting customers. Each registered person also has the option of removing themselves from the mailing list by clicking on the "Unsubscribe from newsletter" link in the marketing message.

If personal data stored in the register is to be deleted, the data will be deleted from the system. upon separate request by the data subject or a person authorized by the customer. Data will also be deleted if it is found to be incorrect.

Data may be disclosed within the Juustoportti Group, but it will not be disclosed to external parties.

The data will not be transferred outside the EU.

## Other rights of the data subject

If they wish, the data subject may request more detailed information about the register or its maintenance from Juustoportti via the contact form, as described at the end of the privacy policy. Persons outside the group are not granted access to the system for the purpose of checking data.

## Risk assessment

The data recorded is not sensitive.

The risk of data leaks is minimized through both technical and administrative measures. At Juustoportti, system development and procurement are guided by defined cybersecurity processes, which suppliers are also required to comply with. Juustoportti also regularly audits the security of its systems and network environments.

Access to systems containing personal data is restricted within the Group by means of personal user IDs, which are only issued to necessary individuals and partners.

# Customer feedback system privacy policy

## Data controller

Juustoportti Oy

Business ID: 2065563-7

Meijeritie 3, 61600 Jalasjärvi

Tel. 06-4566800

In addition, the following companies belonging to the Juustoportti Group act as joint controllers where applicable:

Juustoportti Food Oy, Business ID 2104605-9

Juustoportti ILO Oy, Business ID 0957083-5

Kasvis Galleria Oy, Business ID 1527898-8

Juustoportti Catering Oy, business ID 2104606-7

Station Juustoportti Oy, business ID 2102948-6

Juustoportti Käsämäki Oy, business ID 2808916-6

Juustoportti Kuopio Oy, business ID 2956859-9

## Data processors:

Data is processed by employees of the Group whose work requires the use of such data. Access to data is restricted in the systems by means of user IDs and access rights. In addition, the data is accessible to employees of system suppliers and other partners who work on development or maintenance tasks necessary for the project.

## Purpose and grounds for processing personal data

The purpose of processing personal data is to enable Juustoportti Oy (2065563-7) and its subsidiaries, in particular Juustoportti Food Oy (2104605-9) Juustoportti ILO Oy (0957083-5), and Kasvis Galleria Oy (1527898-8), to contact customers, develop service quality, manage customer relationships, and communicate with customers.

The grounds for processing personal data for marketing purposes is legitimate customer relationship management. Registered persons may be contacted on the basis of their communications, such as customer feedback.

More specifically, the grounds for processing are:

- Consent of the data subject: The data is obtained directly. The data stored for communication purposes is stored on the basis of consent related to the agreed operating method or on the basis of separately requested consent.

The processing of personal data does not include automated decision-making or profiling.

## Data to be registered and data retention period, description of sensitive data and justification

The register only contains information about individuals and their contact details who contact Juustoportti themselves via the contact form on the website.

Information related to customer relationships and sales promotion may be stored about the data subject, such as:

- A person's name for customer relationship management
- The person's phone number and email address for contact purposes
- The person's purchase history for the product being complained about

- The system does not contain any sensitive information

Personal data entered in the register is checked regularly and deleted when there is no legal basis for its storage.

## Regular sources of data

The collection of data subjects' information is based on information collected from the data subjects themselves. Information concerning data subjects is regularly obtained from the individuals themselves.

- By contacting Juustoportti via the contact form

## Regular disclosure of data

Data may be disclosed within the Juustoportti Group.

## Technical and organizational measures for the protection of personal data

Personal data is stored in a server environment that can only be accessed by persons performing necessary maintenance and development tasks. Access to the systems is restricted by technical means to only those necessary for operations.

Access to the system is granted with personal user IDs, and rights within the system are granted on the basis of role solely for functions that are essential for operations. Exporting data from the system is prohibited.

The system collects log data, which can be used by the system supplier to investigate any actions taken. Maintaining log data is important for ensuring the integrity of the system and for tracing any problems that may arise. The system controls the data used in the company's statutory tasks, so the data must be traceable and trackable.

## Verification and accuracy of personal data, and deletion and disclosure of data

Personal data is checked regularly when contact is made.

If personal data stored in the register is to be deleted, the data will be removed from the system at the separate request of the registered person. Data will also be deleted if it is found to be incorrect.

Data may be disclosed within the Juustoportti Group, but it will not be disclosed to external parties.

The data will not be transferred outside the EU.

## Other rights of the data subject

If they wish, data subjects may request more detailed information about the register or its maintenance from Juustoportti via the contact form, as described at the end of the privacy policy. Persons outside the group are not granted access to the system for the purpose of checking data.

## Risk assessment

The data recorded is not sensitive.

The risk of data leaks is minimized through both technical and administrative measures. At Juustoportti, system development and procurement are guided by defined cybersecurity processes, which suppliers are also required to comply with. Juustoportti also regularly audits the security of its systems and network environments.

Access to systems containing personal data is restricted within the group by means of personal user IDs, which are only given to necessary individuals and partners.

## Website privacy policy

Juustoportti's website uses cookies. These small text files are stored on your device when you visit the site, collecting information about how you use the site. Cookies are not harmful and do not cause any damage to your computer, files, or internet usage.

Cookies are used for a variety of purposes, such as site functionality, analysis, and marketing.

The website is monitored by third-party analytics and tracking services, in this case with Google Analytics. The service collects statistics on, among other things, the number of users, website browsing habits, and devices used. This information is used to monitor and improve the functionality of the website.

The website contains cookies from third-party marketing services, such as Facebook and Google AdWords. Cookies collect information, including user interests, age, and location, which helps us better target our marketing to reach people who are interested in Juustoportti and what we do.

Cookies also collect the following information:

- the user's IP address
- the time
- pages visited
- browser type
- from which web address the page was accessed
- from which server the page was accessed
- from which domain the page was accessed.

It is impossible to identify individual persons from the analytics data. Cookies are also used for page registration and login purposes, among other things.

More information about Google's cookie practices

More information about Facebook's cookie policy

More information about cookies in general

Deleting and blocking cookies

Users of the website can block cookies from the Google Analytics web analytics service by installing an add-on in their browser. Other cookies can be deleted or blocked in the settings of the browser used. Please note that some functions require cookies. The website provider will not be able to offer full functionality of the website if the use of such cookies is blocked on the website.

## Contact

If they wish, the data subject can ask Juustoportti for more info about the register or how it's managed on <https://www.juustoportti.fi/juustoportti/yhteystiedot/palaute/> using the contact form available at the address. When disclosing information stored about the data subject, the identity of the data subject will be verified before the data is disclosed. Persons outside the Group will not be given access to these systems for the purpose of checking personal data. No other personal data will be disclosed to persons outside the Group.