

Information on the processing of personal data for the data subject: Ilmastorahasto Oy's customers and stakeholders

1. Controller

Name: Ilmastorahasto Oy (Climate Fund)
Business ID: 2777483-1
Address: Porkkalankatu 1
Postal code: 00180
City: Helsinki
Telephone number: +358 401527570
Email address: info@ilmastorahasto.fi

2. Data Protection Officer

Address: As the controller
Email: privacy@ilmastorahasto.fi

3. Purpose of processing

The personal data is used to enable measures related to the Climate Fund's funding operations, stakeholder work and communications, as well as for the development of the above. This covers, among other things, investment proposal and customer portfolio management, the preparation and implementation of projects and the fulfilment of the related customer due diligence obligations, insider information management and stakeholder management. Data can also be used for the implementation of communications, events or surveys, or for collecting feedback or other opinions. Such use can include communication and the sending of event invitations or questionnaires.

Customer due diligence data and other personal data requested for the purpose of fulfilling the customer due diligence obligation can be used to prevent, detect and investigate money laundering and terrorist financing and such crimes as were committed to gain the assets or proceeds of crime subject to money laundering or terrorist financing. The Climate Fund does not have the right to use customer due diligence data and other personal data obtained solely for the purpose of preventing and detecting money laundering and terrorist financing may not be used for purposes incompatible with this purpose.

4. Basis of processing

The Climate Fund processes the personal data on the following bases, depending on the purpose of processing:

- The performance of a contract between the Climate Fund and the data subject.
- Compliance with a legal obligation (with regard to the processing of personal data related to fulfilment of the customer due diligence obligation).
- The data subject's consent.
- The Climate Fund's legitimate interest, related depending on the purpose of the processing to:
 - o customer relation, dealflow and stakeholder management;
 - o the preparation of investment decisions;
 - o potential cooperation with the organisation represented by the data subject;
 - o communications on the operations of the Climate Fund; or
 - o the improvement of services and operations.

5. Data processed

The personal data processed concern the representatives of the Climate Fund's potential customers, coinvestors, consultants and other stakeholders, as well as people who participate in the Climate Fund's events, give feedback or take surveys. The categories of personal data processed depend on the purpose of the processing. The categories typically processed by the Climate Fund include the data subject's name, contact details, organisation and job title or other position in the organisation. The Climate Fund can also process data related to, for example, the data subject's work history, education and prior cooperation and contact with the Climate Fund, information on the receipt of insider information, as well as the personal identity code where necessary. Data such as information on dietary restrictions can be processed in connection with organising events.

Several types of data concerning the various representatives of potential customers, such as nationality, identification card copies, information on political influence and possible sanctions imposed on the individual, corporate connections, media attention and payment default information, are processed in order to comply with statutory customer due diligence obligations.

6. Regular sources of data

The aforementioned personal data are collected, where applicable, from the data subjects themselves, the organisation represented by the data subject, the Climate Fund's stakeholders and communications partners, as well as from public sources. In addition to the aforementioned sources, customer due diligence data, including payment default information, can be collected from official registers and lists (e.g. the Trade Register, register of beneficial owners and sanctions lists) and credit information registers, such as through the services of Suomen Asiakastieto Oy or the Climate Fund's external consultant, from the credit information service used by the consultant.

7. Data storage period

Personal data will be stored for as long as required for the purpose for which they were collected or for as long as required by regulations. For example, the law generally requires that customer due diligence data be stored for five years from the end of the customer relationship.

8. Disclosures of data

Personal data can be disclosed when necessary. Data can be disclosed within the Climate Fund. To the extent necessary, data can also be disclosed to, for example, external consultants, communications partners and event organisers, the vendors of software used by the Climate Fund, the auditor and internal audit. Information on event participants can be disclosed to other participants. Personal data can also be disclosed to the authorities, such as to the Financial Intelligence Unit when required by law. Personal data can also come to the knowledge of IT support personnel in the course of their duties.

8. Transfers of data outside the EU or EEA or to international organisations The data processed in the Climate Fund's main data management system are stored within the EU. Some of the service or software providers used by the Climate Fund may process data outside the EU or EEA. Transfers of personal data outside the EU or EEA are subject to data protection regulations and are only carried out within the limits permitted by them.

9. Protection of personal data

The Climate Fund employs appropriate technological and organisational safeguards to ensure the secure processing of personal data. Physical access to data is prevented by access control and other security measures. The storage of electronically processed data is secured with technological safeguards. Access to data requires sufficient access rights and authentication with a username and password. Unauthorised access is also prevented with, e.g., firewalls and technological protection. Climate Fund personnel have a secrecy obligation.

10. Automated decision-making

The Climate Fund does not use the aforementioned personal data for automated decision-making (such as profiling) that would have a significant impact or legal effects on data subjects.

11. Rights of the data subject

You have certain rights if the Climate Fund is processing your personal data.

- You have the right to know whether the Climate Fund is processing personal data that concern you. If the Climate Fund is processing personal data that concern you, you have the right to obtain a copy of such data unless the Climate Fund has a lawful basis for refusing your request.
- You have the right to know for which purposes and in what way the Climate Fund is processing your personal data. This information is provided in this document. If you have any questions, you may contact the Climate Fund's Data Protection Officer. The DPOs contact details can be found in section 2.
- If the Climate Fund is processing your personal data based on your consent, you have the right to withdraw that consent at any time by notifying the Climate Fund of this. However, this will have no effect on the Climate Fund's right to process your personal data before the withdrawal of consent or on another lawful basis.
- If your personal data being processed by the Climate Fund is inaccurate, you can ask the Climate Fund to rectify the data. If the Climate Fund rectifies data on the basis of your request, the Climate Fund has an obligation to notify all parties to whom it has previously disclosed the data of the rectification where possible. You can also have incomplete personal data completed by submitting additional information to the Climate Fund.
- If you consider that the Climate Fund is processing inaccurate personal data concerning you or the data is being processed unlawfully, or if you have objected to the processing of your personal data on a specific basis, you can request that the Climate Fund restrict the processing of your personal data. In such cases, the Climate Fund will only have the right to process your data based on your consent or if the data is necessary for the establishment, exercise or defence of legal claims, for reasons of public interest or in order to protect the rights of another. If the Climate Fund restricts the processing of data based on your request, the Climate Fund

- has an obligation to notify all parties to whom it has previously disclosed the data of the restriction where possible.
- In some cases, you have the right to request the erasure of your personal data. However, the Climate Fund may not be required to erase your data, for example if the processing is necessary for complying with a statutory obligation or for the establishment, exercise or defence of legal claims. If the Climate Fund erases your data on the basis of your request, the Climate Fund has an obligation to notify all parties to whom it has previously disclosed the data of the erasure where possible. With certain exceptions, you have the right to request the erasure of your data in the following situations:
 - o The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
 - o The processing of personal data is based solely on your consent, which you have withdrawn.
 - o The Climate Fund is processing your personal data unlawfully or the data have to be erased for compliance with a legal obligation to which the Climate Fund is subject.
 - o You object to the processing of your personal data for direct marketing purposes.
 - o You object to the processing of your personal data and there are no overriding legitimate grounds for the processing.
- You have the right to object to the processing of your personal data by the Climate Fund on certain bases. You can do so at any time on grounds relating to your particular situation. In such cases, the Climate Fund may no longer process your personal data unless there are compelling legitimate grounds for the processing which override your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims. You have the right to object at any time to the processing of your personal data for direct marketing purposes.
- You have the right to lodge a complaint with the competent supervisory authority, i.e. the Data Protection Ombudsman, if you consider that the Climate Fund is processing your personal data in violation of data protection regulations.

