



Musti Group
Data Protection Policy

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Public

Introduction

Data protection is a key part of Musti Group's compliance, risk management and responsibility principles. This data protection policy defines Musti Group's principles with regards to the handling of personal information in order to comply with the EU and national legislation in processing of personal data in all operations and operating countries of Musti Group. This policy applies to all Musti Group's business operations, company employees, contractors, consultants and service providers in all countries within Musti Group and its affiliates.

Objective of the data protection policy

Data protection encompasses individual's right to private life and the processing of their personal information.

The objective of this data protection policy is to define the principles to safeguard the rights of Musti Group's customers, employees and other stakeholders in relation to the use and processing of personal data. Special focus in implementing data protection is given onto non-disclosure of personal data and ensure that all access and processing operations are properly authorized.

Data protection activities are executed in relation to Musti Group's information security policy.

Lifecycle and use of personal information

Privacy and data protection principles are built into Musti Group's company compliance. This is ensured by adopting the necessary legal requirements, practices and the best possible technical and organizational measures into Musti Group's data systems and procedures. Musti Group does its best to ensure that all these legal, technical and organizational measures are applied already at the early stage of processing, i.e. when collecting Personal data.

All employees shall apply Musti Group's internal specific instructions and guidelines concerning data protection and data security.

At Musti Group, the following principles shall be applied when processing Personal data.

1. Lawfulness, fairness and transparency

At Musti Group Personal data is being processed lawfully, fairly and in a transparent manner in relation to the data subject in question. The data subjects are informed transparently of the processing by providing the information on processing transparently, such as, what kind of personal data is processed, for which purposes the data is processed, from where the data is collected and where the data is transferred or disclosed to.

Privacy Notices are maintained for each of our data registers, and such Privacy Notices include the above mentioned information and other necessary details under the articles 13 and 14 of the GDPR. The updated Privacy Notices are available at Musti Group's group website (customers, partners and suppliers) and in Musti Group's internal info channels (employees).

The collecting and processing of Personal data is always based on a legal basis according to the GDPR, such as the current legislation, performance of a customer contract, Musti Group's legitimate interests or the data subject's consent.

2. Respecting the rights of the data subject

The data subject's rights in relation to the controller include e.g. the right to request access to and rectification or erasure of Personal data, restriction of processing and to object to processing as well as the right to data portability.

When processing is based on the data subject's consent, the data subject has the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. The data subjects are informed in detail about their rights in Musti Group's register specific Privacy Notices.

3. Purpose limitation

Personal data stored in Musti Group's registers are collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with the initial purposes for which the data has been collected. Musti Group might use anonymized data for the development of its services.

4. Data minimization

Musti Group does its best to make sure that the Personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which the data is processed. Data that is unnecessary in relation to these purposes is destroyed without undue delay.

5. Storage limitation

Musti Group takes care of the storage limitation and do not process Personal data any longer than is necessary for the purposes for which the personal data are processed. In addition, Musti Group applies special time limits considering storage periods set out in the special legislation.

When the use of personal data for the purposes they are processed is no longer necessary, the data will be deleted from the electronic communication services and other electronic filing systems. Some data may be stored in Musti Group's backup copies and such data is regularly erased in accordance with the backup copy schedule.

6. Integrity and confidentiality

Musti Group does its best to protect Personal data it processes by applying appropriate and updated technical and organizational measures in accordance with best practices and standards in the digital industry.

Musti Group's Information Security Policy defines the framework for information security management by stating the objectives, responsibilities, roles and principles with which information security is managed, monitored, improved and sustained.

Data is used only for the purposes defined and described at the time of collection and within the limits set by applicable law. Data may be transferred outside the EU/EEA provided that the transfer is only to: (a) countries for which the Commission has decided that they have an adequate level of data protection or transfer is made only to (b) parties, which use standard contractual clauses or other appropriate safety measures as they are described in article 46 of the General Data Protection Regulation.

Data protection responsibilities

Implementation of data protection is the responsibility of each function in Musti Group and its subsidiaries.

Every employee of Musti Group shall be aware of the data protection regulation and risks related to processing of personal data within their role and function. There are roles in the organization providing centralized guidance and instructions in implementing data protection.

Each function is responsible for processing of personal data in their processes. Functions are also responsible to ensure there are all necessary agreements, controls and practices in place for outsourcing data processing activities. Outsourcing services shall always require a written agreement and the function is responsible for keeping such agreement up to date. Functions shall also document and keep up to date the processing activities in a group privacy and personal information management solution.

Maintaining data protection knowledge and understanding

Data protection is part of the induction for new personnel and every person receives training on the matter. Privacy awareness is maintained and developed by regularly informing personnel of matters related to the area.

Access to all information systems containing personal data is controlled according to the group's identity and access management policy and maintained by solution or otherwise defined and documented procedures.

In case data protection is suspected of being compromised, such matters are investigated with high priority and without delay. Confirmed cases are reported to the relevant data protection authorities and - when applicable - affected data subjects without delay.

Each function acting as a data owner assesses and monitors the execution of data protection in their processing activities. Group roles providing data protection guidance and instructions perform periodic audits of processing activities as part of their normal operations.

Violations of data protection policy

Any action that violates the law or this policy when processing personal information, is considered a compromise in data protection. In case the violation is identified to influence data subject's rights or has any other external effects, such as external unauthorized access, relevant authorities will be informed. All cases may result in a reminder, warning or even termination of employment.

Informing personnel about the policy

The whole Musti Group personnel must familiarise themselves with the principles defined in this privacy policy and ensure that they comply with them. Musti Group personnel is informed regularly about the Data Protection Policy and its updates on Musti Group's internal communication channels. Data Protection Policy is also published on Musti Group's public website. Additional instructions and guidelines for executing data protection are provided internally for Musti Group's personnel.

Roles and responsibilities

The roles and responsibilities related to information security and data protection are defined in a separate document.

Other policies

In addition to this policy Musti Group has made more detailed instruction for the handling of personal information. Musti Group has also an information security policy that supports this policy.

Approval and confirmation

This Data Protection policy has been reviewed and approved by the management of Musti Group.