

Privacy policy: Stakeholders and Partners



PRIVACY POLICY

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Updated 14 MArchl 2025

Alko Oy (Alko) is committed to protecting your privacy and processing your personal data transparently and in accordance with current legislation and best practices. This privacy policy concerns the processing of personal data by Alko in order to support its business operations – namely, the processing of the contact information of its stakeholders, partners and suppliers. This data is used for maintaining the stakeholder and partner network and for related communications. This privacy policy applies to the processing of personal data on all Alko stakeholders, partners and suppliers.

In this privacy policy, we detail exactly how Alko is committed to collecting, processing and protecting your personal data during and after your cooperative relationship with us.

Below you will find more detailed definitions of the concepts we have used in this privacy policy.

"Personal data"	Personal data means all information concerning an identified or identifiable person. For example, name, social security number, location data, network identification information, and address details.
"Processing of personal data"	Processing of personal data means all data processing operations, whether automatic or manual, that concern personal data. Examples of processing personal data include collecting, saving, storing, editing, altering, erasing or destructing data.
"Data subject"	An identified or identifiable natural person whose personal data is being processed. For example, a customer or employee.
"Controller"	A natural person, legal person, authority, agency or other body that, either together or with another party, specifies the purposes and methods for processing personal data.
"Processor"	A natural or legal person, authority, agency or other body which processes personal data in accordance with the instructions of the controller and on its behalf.

1. The use and processing of personal data

Personal data may be processed on the basis of an agreement you make with Alko, our statutory obligations, or a legitimate interest associated with our operations. We collect and process personal data only to the extent that is required to support our business for the following purposes:

Contractual obligations or preparation of a contract

- Processing of contact information for suppliers and potential suppliers to support procurement processes and contract execution, as well as for reporting and monitoring business operations
- Processing contact information of the supply chain partner network and service partners for communication purposes in order to provide services
- Measures related to the work of administrative bodies (arranging meetings, ac-



cess to information, tools)

Statutory obligations

- Determining and maintaining the contact information and commitments of members of Alko's administrative bodies
- Maintain contact information for stakeholders and politically influential individuals to comply with the requirements of the Transparency Register Act (Avoimiusrekisterilaki).

Legitimate interest*

- Maintaining contact information for media and decision-makers for media and decision-maker communication purposes
- Maintaining information on potential partners in Alko's services
- Developing the competence of suppliers, potential suppliers and service providers (e.g. pick-up point entrepreneur training)
- Developing business operations and organising support events as well as drafting surveys
- Implementing the Quality Control process for products
- Clarifying and maintaining the close associates' interests of Alko's governing bodies

The data we collect consists of the contact details provided and maintained by our partners, and we use the contact data for communication purposes. We primarily collect personal data from the data subjects themselves, the employers of the data subjects and from public data sources online.

The purpose for the processing of personal data will define what information we collect at any given time and for what purpose. We will only process the following personal data about you on the legal grounds specified below:

- **To support business operations, for the purpose of communication between partners and the rest of the partner network, and to attend to, maintain, develop and report cooperation relationships:** name, phone numbers, email address, address, personal photos, supplier number, other information provided by the contact which is relevant and necessary for communication
- **Developing the competence of suppliers, potential suppliers and service providers:** name, email address, responses, information related to training and business location/employer
- **To plan and develop business operations and to draft surveys in support of business operations:** name, organisation, information on participation, survey responses
- **Measures related to the work of administrative bodies and assessment of conflict of interest grounds:** name, address details, email address, phone number, personal ID, bank details, close associates' information of spouses.
- **Activities related to the Transparency Register Act (Avoimiusrekisterilaki):** name, organisation

* "Legitimate interest" refers to data processing that forms an essential aspect of the controller's business and that the customer can reasonably assume to be part of the controller's operations. The controller often has to process personal data in order to carry out business-related tasks. In this context, the processing of personal data cannot necessarily be justified on the basis of a statutory obligation or contractual grounds. However, the processing of personal data may be justified on the basis of a 'legitimate interest'. Before personal data is processed on the basis of a legitimate interest, the controller must always ensure that conducting business in accordance with this legitimate interest will not seriously violate the data subject's rights and freedoms.



2. Sensitive data

Alko does not process sensitive personal data concerning its partners or suppliers.

3. Data disclosure and transfer

Alko is committed to ensuring confidentiality when processing your personal data. In the case of erroneous listings, the contact information of partners can be disclosed to the National Supervisory Authority for Welfare and Health Valvira. In addition, we disclose information as necessary to our contractual partners in order to fulfil contractual obligations. Alko will not otherwise disclose data on partners and suppliers to third parties.

Personal data on the members of administrative bodies will be disclosed in accordance with legal obligations.

When processing the data we have collected, we use subcontractors and service providers to assist us in areas such as technical system maintenance and customer service. These partners have the right to process your personal data only to the extent that is necessary in order to provide the services in question. This means that they cannot use your data for their own purposes. Our contractual terms and conditions require our partners to comply with data processing legislation and ensure adequate data security.

If necessary, your personal data may be transferred outside the EU or EEA in accordance with the provisions of data protection legislation. Such transfers of personal data with partners will be agreed using the standard contractual clauses of the European Commission.

4. Data security

Alko has implemented appropriate technical and organisational data security measures to prevent the loss and misuse of your personal data, as well as any other similar unlawful access to data. These measures include, for example, firewalls, encryption and IT area security.

The processing of your personal data is also restricted by access control and the management of user rights. Your personal data will only be processed by employees who have the right and need to do so in order to carry out their work duties.

5. Access to data and exercising your rights

You have the right to check what data we have collected about you and influence how we use such data. You can decide whether you wish to receive email communications from us. In certain circumstances, you have the right to have your data erased or request your data to be transferred to another controller. In this section, we will detail your rights under current legislation and how to exercise them:

- **Right to withdraw consent**

When your personal data is being processed on the basis of personal consent



from you, you have the right to withdraw this consent at any time. For example, you may at any time end your subscription to our newsletter by withdrawing your consent.

- Right to check and rectify data

You have the right to check what data we have collected about you, or to receive assurance that no data about you is retained in our filing system. If there are any errors, inaccuracies or other deficiencies in your data, you can request us to rectify or add information.

- Restricting or objecting to the processing of data

If your data is incorrect in some respect (for example, it is outdated), you have the right to request a temporary restriction on the processing of your data until we have verified its accuracy. Whenever the processing of your personal data is based on the controller's legitimate interest, you have the right to object to the processing of your personal data. We will then no longer be able to process your personal data, unless we can present a compelling justifiable reason for the processing, which can be considered weighty enough to supersede your rights. We will also be allowed to continue processing your data if we need it to prepare, present or defend a legal claim.

- Right to have data erased (Right to be forgotten)

In certain circumstances, you have the right to be forgotten. In that case, we will erase all the data we have collected about you, unless this data is still required for the purposes it was originally collected for (such as to investigate misuse). Unless there are other justifiable grounds for processing your data, we will also erase your data if you object to the processing of your personal data, or if the processing of your personal data is based on your personal consent and you withdraw this consent. However, please note that we may have statutory legal obligations to retain your personal data for a certain period of time.

- Right to data portability

You may request your personal data to be transferred, in which case we will send your personal data to you in machine-readable format, so you can either retain it yourself or transfer it to another controller. Where technically feasible, we will also transfer your data directly to another controller at your request. This is only possible in situations where we are processing your personal data on the basis of your personal consent or contractual grounds, and this only applies to data that you personally provided to us.

- Right to lodge a complaint

In addition to the aforementioned rights, you also have the right to lodge a complaint with the supervisory authority with regard to the processing of your personal data.

How can I submit a request to check personal data?

You can submit a request to review your information by sending an email to tieto-suoja@alko.fi.

Before disclosing personal data, we will need to verify your identity, so that we do not disclose your data to the wrong person. We will provide more detailed instructions on how to verify your identity when we receive your request.

6. Data retention



We will retain your personal data for the period required in order to carry out the purpose for processing your data, for as long as we are required to do so by law, or until you request us to erase your data.

After this, your data will either be erased or made unidentifiable by irreversibly converting it into a format from which individual persons can no longer be identified.

The retention period is determined by the duration or nature of the cooperative relationship. The data on our partners and suppliers is mainly so-called corporate data (B2B data) and data on the representatives of these organisations. We retain personal data on our partners and suppliers until the contact person requests that such data be erased from the register, unless legislation prevents its erasure. If the contact person changes, you can contact us and inform us of the change.

You can also request rectification of your data by contacting tietosuoja@alko.fi.

7. Amendments to this privacy policy

We will regularly update this privacy policy as we develop our data protection practices and as necessary due to legislative changes. We recommend that you review our privacy policy from time to time in order to be aware of any changes.

A summary of the latest changes to our privacy policy can be found at the beginning of this document to make it as easy as possible for you to monitor the processing of your personal data.

8. Controller and contact details

Controller	Contact person in matters related to the register
<p>Alko Oy Arka-diankatu 2 P.O. Box 99, 00101 HELSINKI Tel. +358 20 711 11 Fax +358 20 711 5386 Business ID: 1505551-4 Domicile: Helsinki, Finland</p>	<p>Alko, customer service, Arkadiankatu 2 P.O. Box 99, 00101 HELSINKI tietosuoja@alko.fi +358 20 692 771 (local network rate)</p>

