

DESCRIPTION OF DATA PROTECTION**Mandatory information given to data subject according to the EU General Data Protection Regulation (GDPR)***Personal data is gathered directly from the data subject*

Controller	Zenito Oy (2573467-6) Döbelninkatu 2 E 29 FI-00260 Helsinki puh. 09 171 0040 info@zenito.fi
Data Protection Officer / Person in charge of register matters	Henrik Kynnäräinen, head of administration Contact information above, direct: +358 40 590 0128, firstname.lastname@zenito.fi
Data subjects	Persons, having / had with Zenito Oy 1) a client relationship or an application thereto, and 2) to a client relationship linked part, duty or other right to agreement, service or order such as potential beneficiaries or persons with proxy
The aim and the legal basis for processing personal data	Aim of processing personal data: 1) managing assignments and services and client relationships regarding investment services, making and managing agreements, identification and personification of data subjects, managing collective data, risk management 2) client communication 3) managing duties related to registering, custody, reporting and other duties based on legislation, regulation and directives given by authorities Processing of personal data is needed (legal basis): 1) for the implementation of an agreement, wherein the data subject is a party, or for implementation of measures, at the request of the data subject, before making an agreement, 2) for being in compliance with statutory obligation of the controller 3) for potential legal proceedings
Basis for gathering personal data	Basis for gathering personal data is legally statutory and a prerequisite demand for making an agreement and maintaining a client relationship. In case the controller does not receive the necessary information from the data subject, the controller shall refuse to open or continue the client relationship with Zenito Oy.
Legitimate interest for processing personal data	The legitimate interest in personal data processing is based on a relevant and proper relationship between the controller and the data subject, the data subject is e.g. a client of the controller.
Receivers of personal data	Tax authorities, authorities supervising concession based operations (Financial Supervisory Authority, National Bureau of Investigation Central for Investigating Money Laundering, Enforcement office, Office of the Data Protection Dataombudsman), concession based co-op partners supervised by authorities such as fund companies, investment firms, credit and payment institutions, acceptable counterparties, and additionally provider of solutions regarding recordable phone calls, provider of IT-maintenance, accounting firm and auditors, and co-op partners performing internal supervision

	All receivers mentioned above are part of the process for implementing different kinds of client relationships and to comply with legitimate obligations.
Contents of personal data	<p>The register contains following data regarding data subject:</p> <ul style="list-style-type: none"> - personification and contact information (official name, address, telephone numbers, e-mail, place of birth, citizenships, domicile, states of residence, language), social security number or date of birth, position in organization, tax countries, ground for taxation or other connection, foreign tax identifiers (TIN), name and social security number of representant, political activity of client / representant, remark if data subject is working at controller or is an insider <p>Other data:</p> <ul style="list-style-type: none"> - branch or field <p>Data regarding services:</p> <ul style="list-style-type: none"> - bank connection information - agreements, power of attorneys, account information (linked account, custody, transfer account) - orders, journals and sessions - identification document information <p>Information, defined by legislation and directives given by authorities, regarding identification, classification, assessment of suitability and appropriateness of client:</p> <ul style="list-style-type: none"> - investor information (investment experience and knowledge, investment aims incl. risk tolerance and risk profile) - client's financial status (education, profession, family status, regular money transfers, the origin of the transferred wealth, beneficial owners^{^)}) incl. loss tolerance <p>The register contains the following data regarding the clients using the <i>web service</i> :</p> <ul style="list-style-type: none"> - user id created by the user (e-mail address) and password, ip -address, information regarding subscription, subscription periods and subscription payments <p>Register data regarding <i>transmission of fund orders</i> :</p> <ul style="list-style-type: none"> - personification and contact information (official name, address, telephone numbers, e-mail, place of birth, citizenships, domicile, states of residence, language), social security number or date of birth, position in organization, tax countries, ground for taxation or other connection, foreign tax identifiers (TIN), beneficial owners^{^)}, account information, financial status, origin of means, investment aims, name and social security number of representant, political activity of client / representant, main branch, remark if registered is working at registrar or is an insider, identification document information <p>^{^)} <i>name, Finnish social security number or date of birth, citizenships, tax countries as states of residence, share of ownership, political activity, address, place of birth, foreign tax identifiers (TIN)</i></p>
Regular sources for data	<p>The data is gathered from the data subject itself or the representants of the data subject.</p> <p>Possibly, if necessary, from commonly available public registers maintained by authorities, and population register centre for ensuring accuracy of the information</p>
Automatic decision making	The controller does not utilize the gathered data for automatic decision making, such as e.g. within profiling. The data is gathered from the client

	<p>or the representants of the client, by the representative of the controller, and the data is assessed on a case-by-case basis. For the web service only technical user information is gathered.</p>
Retention period for personal data or defining criterias	<p>A prerequisite legal demand for processing data is applied on the controller. This means, that the obligations of the investment firm demand retention of personal data after the client relationship has ended, at least a minimum of normally five (5) years, and seven (7) years based on separate demand by the Financial Supervisory Authority, considering also a possible indemnity claim (retention 10 years). Accounting material is retained a minimum period of time from creation, according to relevant legislation.</p>
Transfer of data to third countries	<p>The data is stored in Finland.</p> <p>Data is transferrable to third countries (i.e. countries outside the EU and the EES) only according to the principles set out in the GDPR and by using legitimate security measures.</p>
The principles regarding protection of personal data	<p>Manual material:</p> <ul style="list-style-type: none"> - defined as confidential - data is stored in locked facilities - defined user privileges regarding access to data <p>Electronic customer data:</p> <ul style="list-style-type: none"> - defined as confidential - data is stored in locked facilities - stored securely, protected by firewalls and passwords - access to data is restricted based on defined user privileges and user rights
Processing personal data based on consent	<p>The client can give its consent for direct marketing performed by e-mail, or the client can deny or withdraw consent to direct marketing performed by e-mail, at any time.</p> <p>The client can give its consent for direct marketing performed by mail, or the client can deny or withdraw consent to direct marketing performed by mail, at any time.</p> <p>Consent to or denial of marketing is possible to give either electronically, by phone in a customer service session or in conjunction with other customer service occasion.</p> <p>The client is, however, always given the necessary customer correspondence in order to manage the client relationship and to produce the service.</p> <p>Zenito Oy does not have a direct marketing register.</p>
Cookies	<p>Cookie is a tiny textfile, which is stored by the browser on the user's device. Cookies contain a unique identifier, by which the users can be identified.</p> <p>Zenito Oy utilizes cookies on its web site zenito.fi, in order to produce, develop and simplify the use of services.</p> <p>Zenito Oy utilizes a cookie in its online service zenostock.com, in order to produce services, for authentication of the username and password, enabling users to log in to the service.</p> <p>A user can't be identified solely based on cookies. Cookies and the information gathered by them, are used to analyze the usability and usage of the zenito.fi web pages, enhance security, track usage and for</p>

	<p>development of web pages.</p> <p>By using the web pages of Zenito Oy, ie. zenito.fi and/or the online service zenostock.com the user accepts that cookies are utilized.</p> <p>The user can accept that cookies are utilized or deny it from the browser settings. Cookies are necessary for some services to operate, i.e. Zenito Oy can't guarantee correct functionality of all services, in case cookie functionality is disabled.</p> <p>Releasement of data to third party, please see section 'Receivers of personal data' above.</p>
<p>Data subject's rights</p> <ul style="list-style-type: none"> - <i>The right to access personal data</i> - <i>The right to rectify data</i> - <i>The right to deletion of data</i> - <i>The right to limit the processing</i> - <i>The right to transfer data from one system to another</i> - <i>The right to object</i> - <i>Submitting a request to the controller / Data up-to-date</i> 	<p>The data subject's right to receive transparent information regarding processing personal data is implemented through this description of data protection.</p> <p>Below is presented an extract regarding the rights of the data subject related to the processing and how the data subject can exercise his/her rights.</p> <p><u><i>The right to access personal data</i></u></p> <p>The data subject is entitled to receive a copy of the personal data related to him/her. Acces to some data is, however, restricted in order to prevent and investigate crime.</p> <p>The request must be made in writing, by mail or electronically. In case controller has a legitimate reason to doubt the identity of the person making the request, the controller may ask for further information in order to confirm the identity of data subject.</p> <p>If the request is made electronically, the controller shall submit the information in electronic form, unless otherwise requested by the data subject. The execution of the request is on free-of-charge basis, however, under certain conditions, the controller can charge the administrative costs incurred as a result of executing the requested action or refuse to execute the requested action if the request is apparently unfounded or unreasonable. In such case, it is the controller's responsibility to prove that the request is apparently unfounded or unreasonable.</p> <p>Deadline for delivering the data is one month, which may be extended by up to two months, considering the complexity and number of requests. The data subject shall be informed with reference to any possible extensions of the deadline and the reasons thereto.</p> <p>The data protection officer, who manages the request process and is responsible for informing, responds to requests made by data subjects.</p> <p><u><i>The right to rectify data</i></u></p> <p>The data subject has, with certain exceptions, the right to rectify data. The data subject has the right to demand the controller to rectify, without undue delay, inaccurate and incorrect personal data. Considering the purposes for which personal data were processed, the data subject has a right to complete incomplete personal data by e.g. providing the controller with additional information.</p> <p><u><i>The right to deletion of data</i></u></p> <p>The data subject has, with certain exceptions, the right to deletion of data without undue delay, i.e. the right to be "forgotten". E.g. to withdraw the consent to, on which the processing has been based, and there is no other legitimate reason for processing. In case the controller on a legitimate base is obliged to process data, deletion of data is</p>

possible to execute only when the obligation has expired, e.g. obligations of an investment firm to comply with a defined legitimate minimum retention period for personal data after the client relationship has ended, i.e. five years (up to seven years based on separate demand by Financial Supervisory Authority) after the client relationship has ended, additionally considering for possible indemnity claims (retention 10 years).

The controller is obliged to notify other controllers processing personal data that the data subject has requested a deletion of links to personal data or copies or duplicates of the personal data.

The right to limit the processing

The data subject has the right to limit the processing. The data subject has in different circumstances the right to limit active processing, e.g. in case when data subject submits request regarding rectifying or deletion of data and hence denies the correctness of personal data, or processing is illegal and data subject refuses deletion of personal data and instead demands limitation of processing, the controller does not need such data for processing personal data, but the data subject needs it with reference to a legal claim.

The controller may still retain the data, but not handle it in any other way, without the consent of the data subject. The controller may process personal data of the data subject with reference to setting up, present or defend against legal claim or for reasons relating to important interests of a member country. Before the limitation is removed, the data subject has to be informed on such matter by the controller.

Measures to limit processing of personal data can be e.g. transfer of certain data to another processing system or disable the access of users to certain personal data. Limitation of processing has to be clearly expressed and technically secured.

The controller has to inform every receiver, to which personal data has been released, about rectification and deletion of personal data, or limitation of processing, except if it seems impossible or requires unreasonable effort. The controller has to inform the data subject about such receivers, in case the data subject asks for it.

The data subject's right to deletion of data and limitation of processing is limited.

The right to transfer data from one system to another

The data subject has the right to transfer personal data he/she has given to the controller, from the current controller to another, without any objections from the current controller. The data shall be transferable in structured, commonly used and machine-readable form. The data subject has the right to have the personal data transferred directly from a controller to another, if it is technically possible.

The data subject has the right to transfer, only in case processing is based on consent or agreement, and if processing is performed automatically.

This matter does not concern Zenito Oy as controller. Gathering of data is performed on legal basis, and is not based on consent.

The right to object

The data subject has the right to object to the processing of his/her personal data, with reference to only a part of the processing grounds. The right covers processing, based on performing a task relating to

common interest or controller utilizing its public power and execution of controller's or third party's legitimate interest. Additionally the right to object covers processing for direct marketing purposes and in some circumstances processing relating to particular studies.

When the data subject exercise his/her right to object, the controller may basically not process personal data any further, except if the controller can indicate there being a remarkably important and justifiable reason for processing, replacing the data subject's benefits, rights or liberties or if it is necessary in order to set up, present or defend against a legal claim.

In case personal data is processed for direct marketing purposes, the data subject has the right to anytime object to processing of his/her personal data with reference to such marketing, incl. profiling when it relates to such marketing. In this case data may not be processed any further for such purposes.

The controller is obliged to inform the data subject of his/her right at latest, when contacting the data subject for the first time. Information regarding the right must be expressed clearly and separate from other information. When using technical services the data subject must be able to automatically exercise his/her right to object utilizing technical features.

This matter does not concern Zenito Oy as controller of personal data. Zenito Oy does not possess any registers for direct marketing purposes.

Submitting a request to the controller / Data up-to-date

A request is submitted in writing and the signed request is sent to the address given by the controller (see above; mail/e-mail), marked with 'Request regarding personal data'. The request shall contain name, social security number, postal address, e-mail address and phone number. The response to the request is delivered to the client's address, confirmed from the population information system.

The data subject may according to his/her rights update and change personal data by meeting with representant of controller, by phone through distance identification or in writing with a signed request (address see above).

It is the data subject's responsibility to inform the controller regarding changes in contact and personification information. Check if data is up-to-date is performed in conjunction with meetings and received orders.

Right to make a complaint to supervising authority

The data subject has the right to make a complaint to the supervising authority, in case he/she deems that his/her rights based on GDPR are violated, due to that the processing of his/her personal data has not been performed in compliance with GDPR.

A possible lawsuit against controller or processor of personal data has to be filed in court of that member country, where the controller or processor has an office. Such lawsuit can also be filed in court of that member country, where the data subject has his/her place of residence or work.

In case a person is caused material or immaterial damage because of breach of GDPR, the person is entitled to damages from the controller and the processor for inflicted damage. Each controller participating in the processing of data, is responsible for the damage, inflicted by the processing breaching GDPR. A processor is held responsible for inflicted damage caused by processing, only if it has not complied with the

obligations set out in GDPR regarding processors or it has operated outside or against the legitimate instructions given by the controller.