Description of personal data directories at BTB Plaza Ltd

1. **List of personal data directories at BTB Plaza Ltd**

    a. Client directory
    b. Personnel Directory
    c. Chat feature on the website
    d. Contact form on the website

2. **What we save**

    a. <u>Client directory,</u> potential customers, partners

        i. Information about the company

            1. Company name
            2. Company address
            3. Company website
            4. Company's general email address
            5. Company's phone number
            6. The company's business area (manufacturer, end-user, electricity company, EPC, etc.)

        ii. Information about people at the company

            1. Name
            2. Department if any
            3. Title/Position
            4. E-mail address
            5. Phone number
            6. Subscriber to newsletter, opt-in opt-out

    b. <u>Personnel directory</u>

        i. Personal data
            1. Name
            2. Personal identity number
            3. E-mail address
            4. Home address
            5. Bank account number

    c. <u>Chat on website</u>
        i. If the visitor wants to state his/her
            1. Name
            2. Company name

3. E-mail address
4. Phone number
5. Free text for the inquiry

    d. <u>Contact form</u> on the website

       i. Required fields
         1. E-mail address
         2. Free text for the inquiry

      ii. Optional information
         1. Name
         2. Company name
         3. Phone number

3. Why we have saved this personal information

    a. Client directory, potential customers, partners
      i. To communicate via email or phone with existing clients, suppliers and partners.

      ii. To try to obtain a client relationship with potential customers who have shown interest in our services and goods.

      iii. To send out newsletters and inform about our services for different business areas.

    b. Personnel directory

      i. For work contracts
      ii. For payroll payment (the information is forwarded to the accounting firm JBB, Jakobstads Bokföringsbyrå Ab, which is responsible for payroll payments and is our service provider).
      iii. For occupational health services (information has been forwarded to Jakobstads Arbetshälsovårdsförening r.f. who is our service provider).

    c. Chat feature on the website
      i. To contact the person who wants to be contacted by us.

    d. Contact form on the website
      i. To contact the person who wants to be contacted by us.

4. Where is the data saved and how is it protected?

    a. Client directory

       i. SuiteCRM system hosted by JNT, Jakobstads Nejdens Telefon Ab, Jakobstad, Finland on a dedicated server.
     ii. All traffic is encrypted with an SSL certificate
   iii. Access through personal login for those who have access to it with a username and password

   b. Personnel directory

       i. Excel database
     ii. Only available internally on the company's internal server in a dedicated space, to which only selected persons have access
   iii. Located behind a physical firewall accessible only through VPN tunnel connection

   c. Chat on website
       i. Any information provided by the visitor is sent as an email to info@btbplaza.com and the chat officers.

          1. The e-mail box is a so-called IMAP box, hosted by JNT, Jakobstads Nejdens Telefon Ab, Jakobstad, Finland.

     ii. Also saved as a history at the supplier Chatra, Roger Wilco LLC, on their server www.chatra.io

          1. The contracting party is Roger Wilco LLC, Arlington, USA

   iii. All information is reached through personal login of employees or the administrator who has access to the system as chat officer.

   iv. All data traffic is encrypted with an SSL certificate, forced https: traffic

   d. Contact form on the website
       i. All information is sent as an e-mail to info@btbplaza.com

          1. The e-mail box is a so-called IMAP box, hosted by JNT, Jakobstads Nejdens Telefon Ab, Jakobstad, Finland.

5. Who has access to the data, what are the roles and how are changes and posts logged, how long is data saved?
   a. Client directory
       i. Administrator (Kristian Östman)

          1. Can create new users for the CRM system.
          2. Can create new contacts and change/delete existing contacts.

          3. Can send e-mail messages such as newsletters etc.

        4. All additions and changes are logged and are filed with information about who made them and when.

        5. The data is usually not deleted before an active contact requests this.

        6. Contacts that we have not had any communication with are deleted manually after 5 years of inactivity. This is done twice a year by the administrator.

        7. For the newsletters, it is the subscriber himself who cancels the subscription with the opt-out feature, but the administrator will be able to see who has chosen to cancel the subscription.

    ii. Other employees (Jim Stenman, Thomas Forsman, Joakim Rönngård)

        1. Can create new contacts and change/delete existing contacts.

        2. All additions and changes are logged and are filed with information about who made them and when.

b. Personnel directory

    i. CEO

        1. Maintains the directory with correct information for payroll payments, occupational health services etc.

        2. Deletes the data of persons whose employment contracts have ceased, when this is permitted by existing legislation.

c. Chat on website

    i. Administrator (Kristian Östman)

        1. Can view and delete history

        2. Can create new users / chat officers

        3. There is no logging other than the history

        4. The history is saved until the administrator or a chat officer deletes it.

    ii. Chat officers (Thomas Forsman, Kristian Östman)

        1. Can view and delete history

        2. There is no logging other than the history

d. Contact form on the website

    i. The employees who have access to the info@btbplaza.com email box (Kristian Östman)

    ii. There is no logging

iii. The e-mails are deleted continuously, at least twice a year, by employees who have access to the e-mail box.

6. **Persons responsible**
   a. Client directory
      i. Kristian Östman, ph. +358 50 550 9921, kristian.ostman@btbplaza.com
   b. Personnel directory
      i. Jim Stenman, CEO, ph. +358 40 584 1558, jim.stenman@btbplaza.com

7. **Extracts from the directory, changes and deletions**

   a. Client directory
      i. Extracts from CRM are generated as a PDF file at the request of the administrator or another employee and sent by email to the address we have registered.
      ii. The request for changes is made by the registered person himself by e-mail from the address we have registered and performed by the administrator or other employees.
      iii. The request for deletion of data is made by the registered person himself by e-mail from the address we have registered and performed by the administrator or other employees.
      iv. Subscription to newsletters can be initiated and terminated by the customer himself via a so-called double opt-in or opt-out.

   b. Personnel directory

      i. Extract from the personnel register is obtained after a personal request to the CEO.
      ii. Only data that is not required for payroll payment, occupational healthcare etc. can be deleted.
      iii. However, when work contracts expire, saved data is deleted according to current legislation regarding what data must be saved and for how long.

8. **How we collect personal data**

   a. Client directory
      i. The saving of a contact has been preceded by some kind of personal contact between an employee at BTB Plaza Ltd and the person in question or with the company that the person in question works at (e.g., switchboard operator or general email address).
      ii. All contacts that are saved have also been contacted and verified in one way or another;

         1. Through personal contact with an employee from BTB Plaza Ltd on e.g., trade fairs (business cards)
         2. Through personal contact by phone

       3. Through personal contact by email

    iii. As of 25.5.2018, all contacts entered into the CRM system will first end up in so-called quarantine and also receive an automatic email requesting them to confirm their e-mail address as well as agree to their contact information being saved.

        1. Those who give their consent are automatically transferred from quarantine to the client directory
        2. Those who do not give their consent are automatically deleted when they select that option
        3. Those who do not respond will be deleted automatically if they do not answer within 14 days despite repeated reminders

    iv. Existing contacts from before 25.5.2018 will be provided with information about how we handle customer data as well as information on how to see what information we have saved about them and how to proceed if they want to delete or change something.

9. Collection of other data of a non-personal nature

    a. Cookies on the website

      i. To determine who visits our website, we use cookies to create demographic and user-related statistics.
     ii. Cookies are used to remember the visitor's language choice
    iii. We save information about how much visitors spend on our website, which pages they read, if they have visited us before, which browser they use and what the operating system is etc.
    iv. The cookies we send to visitors are saved for different amounts of time. The date of deletion will be moved forward each time a visitor returns to our website. Cookies are automatically deleted when the deadline expires.
     v. We inform visitors about how we use cookies as well as how to delete cookies sent from their computer and what they should do not to receive cookies.

    b. Cookies on the chat feature on the website

      i. For both anonymous users of the chat function (where the visitors do not want to provide any information about themselves) and for those who provide their name and contact information, the information submitted to a chat officer as well as the chat officer's response is saved.
     ii. To determine which page a visitor is on when using the chat feature, cookies are used.
    iii. The cookies we send to visitors are saved for different amounts of time. The date of deletion will be moved forward each time a visitor returns to our website. Cookies are automatically deleted when the deadline expires.

iv.   We inform visitors about how we use cookies as well as how to delete cookies sent from their computer and what they should do not to receive cookies.