

## **Privacy Statement for Partner Portal**

Protecting your privacy is very important to Mirka Oy ("Mirka") – we want to keep your personal data secure, including registration data provided by you to us through our partner portal (the "Portal"). This policy sets out the basis on which any personal data we collect from you, or that you provide to us, through the Portal will be processed by us.

This document contains the following information:

1. Overall description of our data processing practices
2. Responsible data controller and data processors
3. What data is processed in the Portal, for what purpose, and how long is it stored
4. Data transfers
5. What are your rights
6. Changes to the Privacy Statement
7. Use of non-personal data

### 1. Overall description of our data processing practices

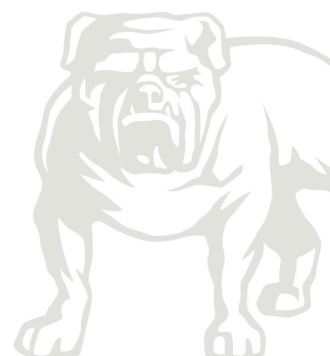
Mirka Oy, as the data controller, collects and processes personal data under this Privacy Statement and in accordance with applicable national legislation, including the EU General Data Protection Regulation. The term "personal data" refers to personal identifiable information that directly or indirectly identifies you, such as your name, physical address, e-mail address, IP number or other contact details. Personal data processing refers to any action that we or a third party that we have engaged takes with the personal data, such as collection, registration and storage. This Policy describes how we process personal data in connection with the Portal. We aim to process personal data that is adequate, relevant and not excessive in relation to the purpose for which it has been collected. We only collect and process personal data where we have lawful grounds to so.

### 2. Responsible data controller and data processors

The data controller for personal data collected and processed in connection with the Portal is Mirka Oy. Mirka also transfers data, and provides access to data to other Mirka Group companies, in particular local subsidiaries, in order to fulfil orders and to manage clients and partners. These Mirka Group companies act as processors on the basis of a written data processing agreement. For inquiries relating to personal data at Mirka, please contact: [privacy@mirka.com](mailto:privacy@mirka.com).

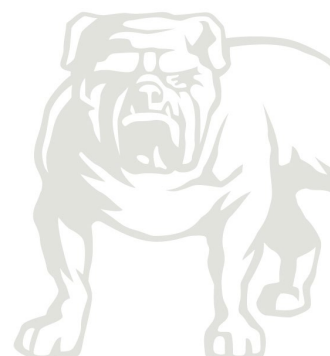
Mirka also uses other data processors to provide the Portal, particularly a cloud service provider (currently SAP), a maintenance and development provider (currently KPS), shipping and payment service providers, and an analytics company (currently Hotjar). Data is processed by all of these processors subject to a written data processing agreement with Mirka.

Furthermore, Mirka partner organisations with access to the Portal ("Partner") may notify user contact information to Mirka in order to use the Portal. In this regard, the Partner(s) act as data processors subject to a written data processing agreement with Mirka.



### 3. What data is processed in the Portal, for what purpose, and how long is it stored

Category of personal data	Legal basis	Purpose of processing	Duration of processing
Name, contact details of users of the Portal	Performance of contract between user and Mirka (GDPR Article 6(1)(b))	Identifying the user profile to give access to the Portal, and to ensure orders can be made through the Portal	6 months after the ending of the agreement between Mirka and the Partner the user works for or 1 months after the user no longer works for the Partner, whichever is sooner  However, with regards to information included in invoices or other material subject to statutory accounting and tax obligations, the data will be retained for 2 years or a longer period as described above
Name, contact details of Partner's representatives	Performance of contract between Partner's representatives and Mirka (GDPR Article 6(1)(b))	Identifying the Partner's representative's profile for administering Partner's users and their rights, as well as communications regarding the Partner Program	6 months after the ending of the agreement between Mirka and the Partner the representative works for or 1 months after the representative no longer works for the Partner, whichever is sooner
Contact details of Partner's representatives and users of the Portal	Legitimate interests of Mirka Oy (GDPR Article 6(1)(f))	Marketing Mirka Group services and products to users and representatives of Partners – subject to separate consent for direct marketing. Carrying out surveys concerning the Portal's usability or Mirka goods/services	6 months after the ending of the agreement between Mirka and the Partner the user/representative works for or 1 months after the user/representative no longer works for the Partner, whichever is sooner



Category of personal data	Legal basis	Purpose of processing	Duration of processing
User's/Partner representative's IP address	Performance of contract between user/Partner's representative and Mirka (GDPR Article 6(1)(b)); legitimate interests of Mirka (GDPR Article 6(1)(f))	Error detection and repair in order to ensure the Service can be used as intended	6 months after the ending of the agreement between Mirka and the Partner the user/representative works for or 1 months after the user/representative no longer works for the Partner, whichever is sooner
User's/Partner's representative's IP address, activity on the Portal	Legitimate interests of Content Licensee (GDPR Article 6(1)(f))	Information collected/processed via Hotjar concerning Portal usage in order to develop the Portal and new Mirka goods/services  Anonymising certain personal data to create statistics concerning Portal usage	6 months after the ending of the monitored session  Anonymised data may be retained for longer periods of time

Data is collected into the Portal mainly from users/representatives through a registration form, although some user data may also be added from Mirka's CRM system or by Partners' representatives. Access to the Portal requires providing personal data, in particular the user's/representative's name and contact information.

#### 4. Data transfers

For data subjects in the EU/EEA/UK, the Portal's servers will be hosted in the EU. However, personal data may be accessed (and therefore processed) from outside the EU/EEA/UK or in some cases transferred outside the EU/EEA/UK, in particular by local Mirka subsidiaries in order to provide services to Partners and fulfill orders. All transfers/processing of personal data outside the EU/EEA is carried out on the basis of an adequacy decision by the EU commission (GDPR Article 45), or subject to standard contractual clauses (GDPR Article 46), complemented by sufficient supplementary safeguards in order to ensure that the rights of data subjects can be fulfilled. You can request a copy of the standard contractual clauses, including a description of the transferred data, by using the contact details provided for Mirka above.



## 5. What are your rights

Since we process your personal data, you can exercise certain rights during specific circumstances under the applicable data protection legislation as follows:

- **Right to access and rectification:** You have the right to request access to the personal data relating to you. This includes e.g. the right to be informed whether or not personal data about you is being processed, what personal data is being processed, and the purpose of the processing. You also have the right to request that inaccurate or incomplete personal data be corrected.
- **Right to restriction of processing:** You are entitled to restrict the processing of personal data in certain situations.
- **Right to be forgotten:** You may also request that your personal data be erased if e.g. the personal data is no longer necessary for the purposes for which it was collected, the processing is unlawful, or the personal data has to be erased to enable us to comply with a legal requirement.
- **Right to Data Portability:** If personal data about you that you yourself have provided is being processed automatically with your consent or in accordance with a contract between you and Mirka, you may request that the data is provided in a structured, commonly used and machine-readable format and you may also request that the personal data is transmitted to another controller, if this is technically feasible.
- **Opt-out from marketing:** We will also give you the opportunity to opt out of future marketing whenever we send you marketing material, you can also opt out at any time by contacting us. In such event, please contact Mirka via the contact details listed below.
- You are also entitled, at any time, to lodge a complaint with the relevant supervisory authority if you consider that your personal data has been processed in contravention of applicable data protection legislation. The supervisory authority for Mirka's domicile is the Finnish Data Protection Ombudsman: <https://tietosuoja.fi/en/home>

## 6. Changes to the Privacy Statement

Mirka reserves the right to amend this Privacy Statement from time to time. We will post any changes to on this page and, where appropriate, notify you by e-mail. Please check back regularly to see any updates or changes to our Privacy Statement.

## 7. Use of non-personal data

Mirka also collects and processes data that does not directly or indirectly identify individual users, or Partner's representatives. Furthermore, certain data is anonymised or collected into general statistics containing on personal data, which may then be used for developing Mirka goods or services, or analysing usage of the Portal. In particular, Mirka uses cookies, as well as Google Analytics and Google Tag Manager in order to analyse Portal usage and traffic; more information concerning cookie practices can be found in our Cookie Statement.

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