

Your privacy at a glance

As a customer of the Estlander Capital group or merely a casual visitor on this website, this privacy notice applies to you. It contains important information on how your personal data is being processed and how you can exercise your rights relating to such data.

If you are a customer, you have a client relationship with at least one of the companies belonging to the Estlander Capital group. From a privacy perspective and depending on the circumstances, Estlander Capital Ltd, Estlander & Partners Ltd and/or Estlander & Partners Fund Management Company Ltd act as controllers. The website is provided by Estlander & Partners Ltd, who acts as controller in relation thereto.

How and why we use your data

Data protection laws require that we only process and use your data for certain predetermined reasons and only, if we have a legal basis to do so.

We process personal data for:

- conducting and developing our business, i.e. the provision of investment services and fund related services as well as thereto related auxiliary services and investment products on a contractual basis
- customer relationship management, customer service and marketing
- fulfilling our legal obligations
- within the group only to the extent permitted by law, such as fulfilling our contractual obligations, managing our customer relationship with you or other legitimate interest.

The processing is based on at least one of the following legal grounds:

- **Contract:** Processing your data may be based on a contract that you have with a company within the Estlander Capital group, or because we have asked you to take specific steps before entering into such a contract, for example for a fund subscription.
- **Consent:** you have given your clear and unambiguous consent for us to process your personal data for specific purposes (like direct marketing).
- **Legal obligation:** Laws, decrees and orders by authorities require us to process personal data to meet our obligations, for example customer identification and anti-money laundering procedures.
- **Legitimate interest:** Processing your data may be required for our legitimate interest or the legitimate interest of a third party, provided those interests are not outweighed by your rights and interest. It might concern for example business development, marketing or managing legal claims.

Types of data we collect:

- Basic identification data (name, social security number/date of birth)
- Contact details (name, phone, e-mail and domicile)
- Financial information, which is needed to fulfill our regulatory requirements when providing our services
- Data on the customer relationship (e.g. client category, service language, contract information, marketing consent, transaction details)
- Data required by law (e.g. tax domicile, tax number, data relating to know your customer procedures and customer identification, including information on beneficial owners)
- Data on how you use the website estlanderpartners.com, if you have enabled cookies

When and how we collect data?

We collect data from you at the commencement of your customer relationship to us as well as during it to administer and take care of what is necessary for your client contract and your customer relationship.

We may also collect data within the group and from third parties, with whom we co-operate to provide you with our services and manage your customer relationship. In addition, we may collect data from publicly available sources provided by authorities (for example the population register centre, commercial registers, and supervisory authorities) and international organizations like EU and UN.

We also automatically collect certain technical data, when you visit our webpage at estlanderpartners.com.

We use cookies

We only use necessary cookies to provide the webpages, improve their functionality, follow up the use of and improving safety of the webpages. The data is not used for identifying individual visitors. You can turn off cookies, but that may impact the functionality of the webpages and that they may not necessarily be available as intended.

Your Rights

As a registered person you have several rights. You can exercise your rights by sending us an email at privacy@estlanderpartners.com

Right to access data that we hold on you

You have the right to access the personal data that we hold on you. We may not at all times be able to meet your request to provide you with your information as your right might be restricted based on law or e.g. the need to protect the integrity of another person.

Right to withdraw your consent

To the extent that processing your personal data is based on consent, for example direct marketing, you are entitled to change your mind at any time and withdraw your consent by notifying us per e-mail on or by unsubscribing to newsletters sent to you.

Right to request correction of inaccurate or incomplete data

If you note that the information we have on you is incorrect or incomplete, you have the right to request correction thereof by submitting a written request.

Right to object to processing

You have the right to object to the processing of your personal data based on legitimate interest and for marketing, including profiling.

Right to request limitation of the processing

You have the right to request that the processing of your personal data is restricted if

- you deny that they are correct
- the processing is illegal but you anyhow object to a deletion
- we do not longer need the data but you need it to manage a legal claim
- you have objected to the processing and the matter has not yet been clarified.

The processing is then restricted only to storing the data and, as applicable, managing legal claims.

Right to port your data

You may ask to have the data that you have provided to us and that is processed automatically transferred in a machine-readable format to yourself or another service provider designated by you. We will not transfer data to the extent that it includes data on another individual.

You have the right "to be forgotten"

You may request the deletion of any personal data we hold about you. This does not necessarily mean that all your personal data is erased, if there is another legal ground for keeping them, e.g. our legal obligation.

You have the right to lodge a complaint

If you are not happy with how we process your personal data, we do hope that you first contact us and give us the opportunity to sort things out.

You may naturally also contact the supervisory authority, the Finnish Data Protection Ombudsman, directly.

How secure is the data we collect?

Protecting your personal data is key to our business and part of our compliance and risk management. We have taken appropriate organizational and technical measures to ensure that your data is safely kept and protected from unauthorized processing and loss.

How long do we store your data?

We store your data as long as needed for the purpose for which they were collected or required by law.

Third parties to whom your personal data is transferred

Personal data processed in relation to your customer relationship is only transferred to our co-operation partners to the extent necessary for providing our services to you and executing your client contract or you have consented thereto. Such co-operations are based on written agreements that ensures that your personal data is protected.

We also transfer personal data to the authorities as far as we have a legal obligation to do so.

Transfer of data outside EU/EEA

For the conduct of our business we partly use services, such as e.g. cloud services, where the service provider is a company located outside the EU or the EEA or that belong to such a group. Transfer of data to such organizations is possible, if there are sufficient protective measures for the transfer in question, which fulfill the requirements of data protection laws. Data may also be transferred in situations when it is required for the execution of your contract or you have provided your consent thereto.

How to reach us

If you have questions or comments on privacy matters or the way in which personal data is being processed by us, please contact:

Estlander & Partners Ltd/Estlander & Partners Fund Management Company Ltd

Alatori 1 A, FI-65100 Vaasa
Tel.: +358 207 613 300

You may also contact our Compliance Officer per e-mail privacy@estlanderpartners.com. If you prefer to correspond via mail, please send your letter to the above address and mark the envelope "Compliance".

Information about this document

This document has been created in compliance with the applicable data protection laws, including the EU General Data Protection Regulation (GDPR). The document was published first on May 25th, 2018. This document is updated as needed.