



# GRK'S PRIVACY STATEMENT

## Introduction

This Privacy Statement concerns all the GRK Group companies, GRK Infra Oy, GRK Rail Oy, GRK Road Oy, GRK Infra AB, GRK Rail AB and GRK Infra AS (hereinafter referred to as "GRK").

We always process your personal information reliably, securely and transparently. GRK always complies with the valid data protection legislation and regulations, such as the EU's General Data Protection Regulation, to ensure data protection and safeguard the transparency of related aspects for our customers, personnel and other stakeholders. Personal data processed by GRK is grouped into different personal data registers on the basis of the purpose of use of the personal data.

## Grounds for the processing of personal data

The processing of personal data may be based on an agreement, a controller's statutory obligation, a person's consent or GRK's legitimate right.

We collect and process personal data only on the basis of a legal and justified purpose and only data required for the purpose of use. Personal data in each register is retained for a fixed period, after which the data is erased.

## Regular sources of personal data

Personal data is collected from the data subject personally, by telephone, online, by email or in another similar manner. In addition, personal data is received from the authorities, such as the Tax Administration.

Cookies are used on GRK's website. Cookies are small text files saved on the user's computer which help to identify a computer that visits the page often and facilitate frequent use of the website. If you don't want your information to be collected by cookies, you can disable cookies in the browser settings. The website may not function properly if the cookies are disabled.

## Privacy statements

Privacy statements have been prepared for all personal data registers. The privacy statements define the more detailed facts about the processing of personal data for the data subjects. The privacy statements concerning GRK's employees are available on GRK's intranet and the privacy statements concerning GRK's customers and other stakeholders are available on the company's website.

## Data processing and processors

We use personal data to implement our obligations based on the legislation and agreements, maintain and develop business operations, maintain customer relationships and carry out



communication related to our business. The purpose of use of each personal data register is clarified in the register's privacy statement.

GRK has outsourced the processing of personal data to domestic service companies. These companies operate on behalf of GRK as the processors of personal data and statutory personal data processing agreements have been signed with these service companies. We have, on our behalf, ensured that our partners and subcontractors comply with the personal data processing procedures pursuant to the legislation and the EU's General Data Protection Legislation and GRK's data protection policy. In addition, personal data is disclosed to the authorities, such as payroll data to the Tax Administration and the Social Insurance Institution of Finland. Personal data is not transferred or disclosed outside the EU or EEA area.

GRK's employees processing personal data have received training in data protection and information security and undertaken to safeguard data processing and protection with their own actions in accordance with GRK's internal instructions and the legislation. Our employees have access only to personal data absolutely necessary for carrying out their duties. Admin logins and rights are only granted to a GRK employee or service provider acting on behalf of GRK whose position and tasks concerning the access right and processing of personal data are related.

We have appointed a Data Protection Officer who acts as the stakeholders' contact person at GRK in matters related to data protection and monitors the compliance with the data protection legislation. You can contact the Data Protection Officer by sending email to [tietosuoja@grk.fi](mailto:tietosuoja@grk.fi).

## Rights of the data subjects

In terms of the personal data processed by GRK, the data subject has the following rights:

1. **Right to receive information about the processing of their personal data.** GRK processes personal data transparently in relation to the data subject and informs the data subject of the data processing principles. For communication purposes, GRK has prepared, in addition to this document, register-specific privacy statements which state the purposes for the processing of personal data, legal grounds, processing periods, possible disclosures, data acquisition and rights of the data subjects. In cases of doubt, GRK's Data Protection Officer provides more information about the processing of personal data.
2. **Right to access their data.** This right can be exercised by sending a free-format email to GRK's Data Protection Officer at [tietosuoja@grk.fi](mailto:tietosuoja@grk.fi). The data access request must state the name and contact information of the requesting party as well as the information subject to the access request. The data will be provided to the requesting party in an agreed manner and the requesting party's identity will be verified before disclosing the data.
3. **Right to rectify their own data.** If incorrect or outdated data about the data subject has been saved in the register, the data subject may ask the rectification of the data by contacting GRK's Data Protection Officer.
4. **Right to restrict the processing of their data** in situations defined in the Data Protection Act.
5. **Right to transfer data from one system to another.**
6. **Right to withdraw their consent** if the processing of personal data is based on consent.



7. **Right to object to the processing of their data** if the processing is not based on an agreement, controller's statutory obligation or legitimate interest.
8. **Right not to be subject of automated decision-making.** Automated decision-making is not applied to GRK's processing of personal data.
9. **Right to request the erasure of their personal data** in cases when the controller's statutory obligation no longer necessitates the processing or retaining of the data.
10. **Right to lodge a complaint with a supervisory authority** if the data subject deems that their personal data is processed incorrectly.

## Safeguarding personal data

Personal data is only processed by GRK's employees whose duties require the processing of personal data. Personal data in each register is safeguarded with appropriate and up-to-date means. Special attention has been paid to protecting the information systems containing personal data. Furthermore, appropriate facilities and methods are used to process and store printed personal data. GRK's employees are trained to protect personal data as required by their confidentiality.

If we observe any data protection breaches, we will report the breach to the authorities in accordance with the data protection legislation. Data protection breaches are investigated and processed in accordance with separate instructions.

## Reporting to the personnel, data subjects and stakeholders

Changes in the data protection policy are communicated in the intranet, where the latest version of this document is available. You can also find the up-to-date privacy statements of our registers as well as the terms and conditions and privacy statement of our website on the intranet and our website.

## Contact details

You contact GRK's Data Protection Officer by sending email to [tietosuoja@grk.fi](mailto:tietosuoja@grk.fi).