

1.1

How do we protect your privacy?

Fortum, as controller, is committed to protecting your privacy and will process your information in accordance with data protection laws and good data processing practice.

When providing and developing the service, we only process data which is necessary for the purposes defined in this Privacy Notice.

In addition to limiting the data we collect, we do our best to keep the data we have on you secured at all times. The data we process on you is, for example, protected against unauthorized access by both standard security mechanisms and organizational measures. Additionally, the SmartLiving application supports requirements set out in data protection laws such as the European Union General Data Protection Regulation.

1.2

For which purposes do we use the information about you?

We use information on you to provide the SmartLiving application (the "Service") to you. By providing Fortum with information on you and by accepting the collection and processing of personal data on you, you make it possible for us to provide the Service to you, develop the Service and ensure that you are able to use all the functions of the Service.

For example, in order for you to be able to view and control certain sensors in your apartment and, as a result, use certain features of the Service, we need to connect your account with your apartment's data. Due to this, we process information such as data on your apartment's temperature and humidity, and your apartment's consumption data and alarm services in order to provide features of the Service to you.

Additionally, as part of providing the Service to you, we process information on you in order to maintain and further improve the Service and other smart living solutions, and to provide customer service to you regarding the Service.

To summarize, we process data on you for the following purposes:

- To provide support and service on your demand;
- To carry out customer communication;
- For product and service development, including feedback and surveys;
- To secure technical functionality of the Service; and
- For optimization of the Service.

All such personal data processing related to the Service is based on Fortum's legitimate interest and our need to process such personal data due to the customer relationship between you and Fortum.

For more information on the SmartLiving service itself, please turn to your housing company or to Fortum's customer service.

1.3

What kind of information do we collect about you?

We collect personal data directly from you, from the sensors installed into your apartment, and from your use of the Service. The information we process may include:

- Your basic account and contact details
When you register as a user of the Service, you provide us with your name, e-mail, phone number, and a user password and pin code selected by you as a user.
- Apartment and house data
We process information on your apartment for support and maintenance purposes. Such information may include the apartment number and address, and the size of your apartment, to be used in energy visualization for heating.
- Consumption data from your apartment
We process information automatically collected from meters in order to provide you as a user with an understanding of your energy usage. Such information may include electricity (power and accumulated energy), hot water (energy and accumulated volume) and district heating (power and energy).

As an option to collecting the above information, you can provide your household size and energy goal. By doing so you we will be able to compare your usage with an average household of your type.

- Data from your apartment
We process information collected through the components installed in your apartment. The information collected includes information on your apartment's energy consumption, solar power generation, and set parameters such as dim level and temperature, in addition to a fire alarm, flooding alarm and burglary alarm.
- Technical information from the device
We process information from devices, such as firmware, MAC-address, SmartLiving GW IP-address (private IP), software version, battery charge level and other configurations on the device used.
- Information on how you use the Service
We may automatically receive and store certain type of information using Google Analytics SDK whenever you interact with the Service. For example, Google Analytics may track how often you use the application, what features you use, and how long you use them for. Google provides this information to Fortum anonymously with no personal, identifying information associated with it. We use this anonymous data to understand how the Service is used and to further improve the user experience. More information is available on Google's website: <https://policies.google.com/privacy/partners>.
- Information derived from your use of our services
With the help of the personal data you give us and the information we collect on how you use our Service, we may use analytics to build up a profile based on your routines and preferences.
- Information added by you as a user on your smart home
We store data you add on your smart home and the devices we have installed. Such information may include, for example, names of rooms, light sources and sensors. This is for your ease of use and for you to be able to easily navigate and use your smart home.

1.4 Do we share information on you to others?

Only a selected group of authorized users are given access to our data systems. As a result, access to personal data is highly limited.

We may disclose and transfer your personal data within the Fortum group of companies. These Fortum group companies may process the personal data only in accordance with this Privacy Notice.

In addition, we use third parties, such as service providers, to collect, store and process personal data on our behalf. Such service providers are only allowed to process your personal data to the extent necessary for them to provide the services we have requested from them. In order to protect your privacy, we require that all our service providers keep the personal data we provide them confidential and adequately secure. In most cases the personal data is provided to third parties only in encrypted form and is not readable to such parties. Regardless of what form the personal data is provided to them, third parties are required to abide by data processing agreements and applicable data protection legislation. As a main rule, they are not allowed to use your personal data for the benefit of their own business.

Fortum does not regularly disclose personal data outside the Fortum group of companies. However, we may disclose data to third parties if such disclosures are necessary due to mandatory law, or are reasonable based on our careful consideration.

Apart from limited individual situations, we do not transfer information on you outside of the European Union or European Economic Area.

1.5

How long do we store information on you?

We process your information only to the extent and as long as is necessary to meet the purposes set out in Section 1.2 above. Fortum sets out and regularly re-evaluates data type specific retention periods for the personal data it holds. Once personal data is no longer necessary, we delete it or anonymize it as soon as possible.

1.6

What are your rights related to personal data processing?

As a user of our Service, you may access and amend your preferences and other profile information at any time by contacting SmartLiving customer service by sending an e-mail to smartlivingsupport@fortum.com or calling +46 771-411001.

You have the right to access the personal data we have collected on you and request that we erase or rectify any erroneous, unnecessary, incomplete or obsolete personal data. You also have the right, in certain situations, to object to the processing of your personal data and

ask Fortum to stop processing your personal data. In limited situations you may also have the right to request that we delete data on you and/or transfer such data to third parties. We will review all such requests from you and get back to you with our answer as soon as possible.

In situations where you have given us your consent to a certain type of data processing, you have the right to withdraw the consent to or otherwise opt-out of such personal data processing. This is especially relevant with respect to possible profiling, direct marketing and the collection of location data.

You may use the rights described above and/or express any concern you might have about our use of your personal data by contacting us via the contact details provided below in Section 1.8 (Contact).

We will do our best to resolve any issue you might have related to our processing of your data. However, if you are not satisfied with our answers or actions, you may always turn to your national data protection authority.

1.7

Changes to our privacy notice

Fortum reserves the right to amend this Privacy Notice. Possible amendments to the Privacy Notice will be notified about on our website.

Amendments may be necessary due to the development of our services or, for example, changes in the relevant laws.

1.8

Contact

Questions, comments and requests regarding this Privacy Notice are welcomed and should be addressed using the contact details below.

Fortum Markets Sweden AB
SmartLiving Customer Service:
Mail: smartlivingsupport@fortum.com,
Phone: 0771-411001