

25 May 2018

Privacy notice - Consumers

In our updated privacy notice, you can read more on how we treat your personal data. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

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The data controller

This privacy notice addresses personal data handling, which is being done by Fortum Markets AB 556549-0678 (below described as "Fortum", "we", "our" and "us"):

Contact information for Fortum can be found in the section "Contact" at the end of this document.

How does Fortum process your personal data?

We need to treat your personal data for many different purposes and in several ways. Common for all our personal data processing is that it is carried out with appropriate safeguards taken into account and in accordance with the fundamental principles in data protection legislation.

In this information, we have compiled the different data types, purposes and legal bases on which we rely for our data processing. In case of significant changes, we will inform you appropriately, see below at the end of the information text.

What kind of data does Fortum collect?

Fortum collects and process personal data in various categories, including :

- **Contact data** - such as your name, address, phone number, user name, customer number, password and if appropriate your image
- **Agreement and service data** – such as information about our services which you are using, agreement period, termination notice, and other information related to your agreement with us.
- **Transactional and consumption data** - such as data about your purchase of our products and consumption of our services
- **Financial and invoicing data** – such as *your invoice address, payment terms, credit card number, bank account information*
- **Ticket data** - such as information about your contacts with Fortum's customer service, information about installations, support tickets, complaints etc.
- **Behavioural data** - such as customer segment, how you react to our offerings to you and how you use our products, services and web sites
- **Device data** - such as IP number and other information from cookies
- **Permission data** - such as marketing permissions.

Fortum collects data that is necessary for the relationship you have with us and the purposes for which the data are used. All our data processing of personal data has legal basis.

What sources are the personal data obtained from?

The personal data which we process about you comes from different sources:

- We receive information from yourself, when you order our services, when you fill in a form of interest or send in your personal data to us. We will then inform about the necessary and mandatory data which is needed for us to provide you that service.

- We receive information as part of our relationship with you as our customer, such as consumption data, ticket handling, device data or behavioral information.
- We receive information from public sources, such as public address registers or from third parties, which we are cooperating with, such as credit information provider, debt collection services, installation partners, marketing partners.

What are the purposes for processing personal data?

We process personal data only for predefined purposes. The purposes for which we process personal data are:

- **Customer relationship management and Customer satisfaction surveys**
To be able to manage a professional relationship with our customers, and to for example, provide customer service by phone, email and through our digital channels, we need your personal data. We deal with customer complaints by collecting information and preparing answers. We communicate with customers via email, phone and our digital channels regarding the relationship we have with our customers.
- **Contract and product management, Delivering and Maintaining service and Consumption reporting**
We need a contract with all our customers to fulfil our contractual obligations to you. Therefore, we collect personal data to create and manage contracts, and to deliver our products and services. We communicate with our customers, e.g. contract related notifications. We update our customer data, collect data of customers' consumption and of the related services, to offer our customers the best solution.
- **Billing and debt collection**
We process personal data to be able to invoice our customers for the energy consumption, for our products, goods or services. We create invoices based on customer data, contract information and information on delivered energy/goods/services. We handle payments made by our customers, respond to change requests and we archive invoices and contracts.
- **Sales and Marketing and Product and Service development**
In order for us to communicate with our current customers about our services, new products or other topical issues, we use our customers' email addresses for newsletters, and marketing messages. For prospective customers, we process personal data, which we receive through online surveys and activities, in events, etc.
- **Public authority reporting.**
We are sometimes required to report some personal data to authorities, such as the tax authorities.

On what legal basis do we process your personal data?

We rely on several legal bases when processing your personal information:

- Your specific and freely given consent. If we rely on your consent as the legal basis for processing your data, you may withdraw your consent at any time,
- The processing is necessary to fulfill an agreement between us and you or necessary to conclude such an agreement,
- The processing is necessary to fulfill a legal obligation that is owed to us (for example, we are required by law to store certain data for a certain period of time) and / or to determine, enforce or defend Fortum against legal claims or claims,
- The processing is necessary for purposes pertaining to the legitimate interests of our or third parties, which consider the registrant's interests and fundamental rights and freedoms (ie, balance of interests). Our legitimate interests in such treatments are:
 - Conduct cost-effective and relevant business activities
 - Develop, improve and sell our products and services as well as to maintain a good customer contact, including customer feedback and customer surveys
 - Maintain correct, relevant and unified records and tasks
 - Receive payment for completed or delivered products and services
 - Provide effective support and case management to customers
 - Provide relevant and effective direct marketing in relation to existing customers, including profiling and segmentation for marketing purposes (see further information below)

How do we treat your data for marketing purposes?

Within Fortum, we value effective and transparent marketing towards you as our customer. Processing your personal data for marketing purposes is necessary for our legitimate interest in developing, improving and selling our products and services, and maintaining a good customer relationship.

In all our communication, you are given the opportunity to oppose and to refuse any further marketing outlets.

We will for example conduct market analyzes, compile statistics and evaluating, develop and inform you about our services and products. You can receive monthly newsletters or general information about customer benefit for example, unless you actively oppose such communication. We can also send you targeted offers based on your purchases, your service / product holdings and / or your behavior in communicating with us. Such targeted offers aim to offer you relevant offers for products and services that we believe you are interested in. Targeted offers require that we divide our customers into different groups (eg segmentation or profiling) based on your interactions with us.

How does Fortum use personal data in automated decision-making?

We may make decisions about you through automated decision making e.g. automated credit checks during contract period, which may affect your ability to use our services. We use automated decisions to have efficient, digital, predictable and legally secure decision and business processes. We will normally give you more detailed and specific information about such automated decision making processes in connection to the start of the application/decision, including information about the logic behind as well as the consequences of the handling.

If an automated decision is not necessary for entering an agreement between you and us, we will collect your consent to an automated decision making in advance.

If we have made a decision about you solely on the basis of an automated process (e.g. through automatic profiling) and that affects your ability to use the services or has another significant effect on you, you can ask to not to be subject to such a decision unless we can demonstrate to you that such decision is necessary for entering into, or the performance of, a contract between you and us.

How long do we store the personal data?

Fortum seeks to limit the period for which the personal data are stored to a minimum. Thus, Fortum processes your personal data only to the extent and as long as is necessary to meet the purposes of the data processing. Generally, we store your personal data during the entire customer relationship and, for the purpose of trying to recruit you back as our customer, during a period of 12 months after the relationship has ended.

For some personal data, there are legal requirements which set the retention period. For example, personal financial data, connected to consumption, needs to be stored for 7 years according to the Accounting Act (Bokföringslagen) (1999:1078). Personal data relating to metering data (including energy consumption and production data) will be retained for 10 years from the date that the metering date was obtained, in accordance with the Electricity Act (Ellagen) (1997:857).

Who processes your personal data?

Principally, we do not sell, trade or license any personal data to third parties. Companies belonging to the Fortum group of companies may process personal data in accordance with existing privacy laws. Personal data may be disclosed to our authorized employees or affiliates to the extent necessary for the purpose of processing. The data will never be available to all employees but to a limited number of authorized persons.

We also use third parties as our data processors to help process personal data on our behalf. When a third party processes personal data on our behalf, we always ensure via contractual arrangements that the processing of personal data is always conducted safely and in accordance with privacy laws and data processing best practices.

List of categories of the third parties processing data (=data processors):

- Service providers, such as printing services, debt collection services, installation partners , credit information provider,
- IT service providers, Cloud service
- Sales and marketing partners

In addition, personal data may be disclosed to authorities and external parties, which are processing personal data for their own purposes. These parties include:

- Tax authorities, to fulfil our legal obligations according to the tax regulations
- Nordea, to handle payments
- Post Nord, to deliver invoices and other communication
- Bring City Mail, to deliver invoices and other communication

Does Fortum transfer personal data to third countries?

Principally, Fortum does not transfer personal data outside the European Union or the European Economic Area (EEA). However, if personal data is transferred outside the EU or the EEA, Fortum uses appropriate safeguards in accordance with existing privacy legislation, such as the standard contractual clauses provided by the European Commission. If you wish to receive a copy or more information about the standard contractual clauses and Fortum's transfer/processing of personal data outside of the EU/EES, please contact our Data Protection Officer. You find the contact information at the end of this privacy notice.

How does Fortum protect the personal data?

Fortum fulfils the necessary technical and organizational measures, which ensure and demonstrate that privacy laws are being followed in the processing of personal data.

These measures include the monitoring of access rights so that only the authorized persons have access to the personal data, using firewalls, pseudonymisation of data, detailed instructions and training for personnel on protection of personal data and careful consideration when selecting our service providers that are involved in the processing of personal data on our behalf.

How do we handle personal data from cookies and similar technologies?

When you use our services or visit our websites, Fortum can collect data about your devices through cookies and other tracking techniques.

Cookies are a small text file that we use to identify and count the browsers and devices that visit our websites. This information may then be used by us or third parties for marketing purposes.

Our use of cookies differs depending on which of Fortum's websites you visit. You can get more information about which cookies we use on a particular website by reading the specific information about cookies on the current site.

What are your rights when it comes to your personal data?

You have as registered a number of rights by law:

- **Right of access** - You have the right to access your personal data, which means that you have the right to confirm whether your personal data are processed and, if so, also receive a copy of the personal data that is processed by Fortum (so-called registry extracts) and further information about the processing carried out by Fortum.
- **Data Portability Right** - You are entitled to data transfer, which means that you may, under certain circumstances, have the right to have the personal data transmitted to another controller.
- **Right to rectification**- You are entitled to receive incorrect information about you corrected or supplemented.
- **Right to erasure** - You have the right to have your data erased, if
 - the data are no longer necessary for the purposes for which they are processed;
 - you revoke your consent for some treatment and thereafter there is no legal basis for Fortum to process the data,
 - your data has been processed illegally, or
 - the processing of your data is not necessary to comply with applicable legal requirements in order to determine, enforce or defend legal claims and / or for archival, research or statistical purposes.
- **Right to revoke consent** - If you have given special consent to certain treatment, you are always entitled to withdraw your consent.
- **Right to object to processing of personal data** – When processing is carried out on the basis of the legitimate interests pursued by Fortum or by a third party, you have the right to object at any time to processing of personal data concerning you. Unless Fortum can demonstrate compelling legitimate grounds for the processing, Fortum shall no longer process the personal data.
- **Right to object to direct marketing** - You are entitled to object to the processing of personal data pertaining to you for direct marketing at any time. Then we will no longer process personal data for such purposes.
- **Right to restriction** - You are entitled to limit your data during the time we investigate and check your request.
- **Right not to be subject to automated decision** - If we have made a decision about you based entirely on an automated process and the decision has legal consequences or otherwise significantly affects you, you may request that the decision be reviewed by us through renewed and individual assessment. This applies if we cannot prove that an automated decision is necessary to conclude or implement an agreement between you and us.
- **Right to complain to the supervisory authority** - You are entitled to complain to the Data Inspection Authority or other competent regulatory authority if you believe that we treat your personal data in violation of applicable data protection legislation.

If you wish to exercise any of your rights above, please send a written and self-signed request to the address stated at the end of this information text.

Changes to our privacy notice

Fortum reserves the right to amend this Privacy Notice, for example due to changes in the legislation or if we change our services in a way which affects the way we process personal data.

Possible amendments to the Privacy Notice will be notified in an appropriate way, depending on the changes and the impact it has on you as registered. Information may be communicated via email, via Mitt Fortum, in connection to our other communication with you, on our web site or via another suitable channel.

Contact

If you have questions regarding this privacy notice, or if you would like to execute your rights, you are welcome to contact us on the following address:

Fortum
Integritet
115 77 Stockholm

E-post: privacy@fortum.com

Please, note that requests for exercising your rights regarding your personal data (such as accessing your personal data) will not be handled through email.