

Privacy Policy – Suppliers and contractors

Last update: 12 June 2025

Introduction

We value your fundamental right to privacy. As a company based in the European Union, we adhere to our obligations under the General Data Protection Regulation (GDPR). In this document, we inform you about our processing of your personal data if you're our supplier or contractor (or a representative one).

For clarity, we have divided the privacy policy into two parts:

- **Part 1** contains general information about personal data processing.
- **Part 2** applies to the processing of your personal data specifically.

If you have any questions or concerns regarding the processing of your personal data, please don't hesitate to contact us:

Gubbe Sydänystävä Oy

Privacy team

Erottajankatu 1–3 A 8, 00130 HELSINKI, FINLAND

Tel: +358 44 724 6007

Email: privacy@gubbe.com

Data Protection Officer: Susanna Laanikari (contact details as above)

We may update our privacy policies from time to time. The date of the last update is shown above. Minor changes will be shown in this document, and we ask that you review it regularly. Changes that significantly affect your

rights and freedoms will be communicated to you by email or notification if we have your contact details.

Part 1: General information

Categories of personal data

As you are our supplier or contractor (or a representative of one), we regularly process certain categories of your personal data. These depend on the various purposes that we process your data for. A detailed list of the various purposes and categories of data that we process is shown in Part 2 of this privacy policy.

Some categories of personal data are mandatory in the sense that without certain data, we cannot provide our services to you or carry out other critical processes related to our business relationship. In some cases we may also have a legal duty to process certain categories of your personal data. We have marked clearly, which categories of personal data are mandatory for a given purpose.

Sources of personal data

We primarily process personal data that you give us, for instance when we discuss our business matters or sign a contract, or when you subscribe to your company newsletter.

However, in some cases we may receive personal data relating to you from other sources. These are:

Source	Examples
Public records	Before signing a contract, we may check company registers and business data services to see if you are authorised to sign the contract for your company.

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	We may also check certain public background data, such as official sanctions registers and insolvency information to manage our due diligence obligations and legal and financial risks.
Your company or organisation	Many times we receive your contact details and information updates from the company or organisation that you represent, rather than directly from you.
Social media and the internet	Often we look for your company information using social media and the internet. Sometimes this information may contain your personal data.
Technical sources	We use cookies and similar technologies on our website and other platforms. These often collect and process certain technical personal data, such as your IP address and device identifiers.

Retention periods of personal data

When processing your personal data, we adhere to the principle of storage minimisation. That means we only keep your personal data as long as necessary for the purposes that we describe more in detail in Part 2, and only as long as we have a legal basis set out in the GDPR to process the data.

As soon as no relevant purpose or legal basis applies, we will either erase your personal data or anonymise it in an irreversible manner.

Sharing your personal data with third parties

As a provider of commercial services, we like most other companies have to outsource some of the processing of your data to our trusted partners. Because of that, we share certain categories of personal data with third parties.

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We always make sure that all disclosures are protected by a contractual arrangement between us and our trusted partners to protect your personal data, as required by the GDPR.

Our trusted partners can be categorised as follows:

Category of recipient	Examples
Supplier and contractor management Data storage and information management services	<p>We use cloud-based data storage and information management systems provided by our trusted partners to store and manage various types of documents and other data. Many of these documents and other data include also your personal data.</p>
Billing, accounting and taxation	<p>We use payment processing services and banks to process our payments. When we pay your invoices or otherwise process payment information involving your company, your personal data (such as name and contact details) may be shared with them.</p> <p>We also use external accounting software, accountants and auditors to handle our bookkeeping and other financial matters. They have a legally mandated access to our financial documentation, which may include your personal data.</p>
Communications	<p>We use hosted emailing and other communications systems (such as instant messaging platforms) provided by our trusted partners. When we communicate with you, or when we include your personal data in our communications with others, your personal data passes through these systems.</p>
Website and other platforms	<p>We use hosted website and content delivery network systems, as well as cookie management tools provided</p>

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	by our trusted partners. When you use our website and other platforms, these systems process your personal data (such as your IP address and device identifiers) through technical sources.
Professional advisers	From time to time we use external consultants and advisers to help us with various things. These may be for example business consultants, financial advisers, and legal advisers who, depending on the circumstances, may need to access various types of information, including our customer data.
Public authorities	If we are legally required to hand over information about our business transactions or other things to public authorities, this may include your personal data.
Mergers and acquisitions	If we are ever subject to a merger or acquisition by another company, all of our data, which naturally includes customer data, may be legally transferred to that company.

Transfers outside the EU/EEA

We normally process your personal data exclusively within the European Union and European Economic Area. In some cases, we or our trusted partners process your personal data outside these areas. If that happens, we will make sure through various safeguards that your personal data will be processed in a compliant way.

Some of your personal data are transferred to the following countries:

Country	Safeguards
United States	We and our trusted partners make sure that transfers are protected under the EU-US Data Privacy Framework approved by the European Commission. If not, we and

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	our trusted partners make sure transfers are protected by contractual arrangements using the Standard Contractual Clauses (SCC) issued by the European Commission. Should we be unable to take any of these precautions, ultimately we'll ask for your consent for the transfer.
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If you wish to learn more about the ways we protect your data when transferring outside the EU/EEA, please contact us using the contact details above.

Your rights

According to the GDPR, you have various rights as we process your personal data. These are:

Type of right	Description
Right of access	<p>You may ask us whether we process any personal data about you, and if we do, you have a right to request a copy of some or all of the data. You also have a right to ask for more information regarding the third-party recipients of your personal data as well as our protective measures applicable to the transfers of your data to our trusted partners and outside the EU/EEA.</p> <p>If you request a copy of your data, we will send it to you electronically. In most cases we will be glad to accommodate your request, but if we receive repeated or manifestly unfounded requests from you, we may have to refuse or charge a reasonable administrative fee to process your request.</p>
Rectifying incorrect or incomplete personal data	If you consider that some of your personal data that we process is incorrect or incomplete, you may ask us to correct or complete the data. We will investigate your

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	request without undue delay, and accommodate it if we can be sufficiently certain that the request is justified.
Erasing personal data (“the right to be forgotten”)	If you don’t want us to process your personal data, you may ask us to erase a part or all of it. We will do our best to accommodate your request, but in some cases we may have to refuse or postpone the request. This may happen e.g. if we have an on-going business relationship with you and we need your personal data to perform our contractual obligations, or if we have a legal duty or a legitimate interest to retain some of your data (we have described these in more detail in Part 2).
Restricting the processing of personal data	<p>If you consider that our processing of your personal data breaches the GDPR or other laws, you may ask us to restrict the processing (i.e. to stop the processing for the time being). We will accommodate your request as well as possible while we investigate the matter.</p> <p>You may also ask us that we do not erase or otherwise process your personal data if you need the data e.g. in a legal dispute and the erasure or other processing would jeopardise your interests in that regard. We will aim to accommodate your request as well as possible.</p>
Objecting to processing of personal data	As explained in detail in Part 2, we sometimes process your data on the basis of our or someone else’s legitimate interest. If that’s the case, you may object to our processing of your data on that basis due to a reason relating to your particular circumstances. We will aim to accommodate your request as much as possible, however in some cases the legitimate interests in question may be so important that they outweigh your interest to object.

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	If in that case we cannot accommodate your request, we will let you know about our reasons for not doing so and inform you about your right to lodge a complaint with the relevant data protection authorities.
Withdrawing consent	As explained in detail in Part 2, we sometimes process your personal data on the basis of your consent. If that's the case, you may, at any time, withdraw your consent for that processing. We will accommodate your request without undue delay, however we may continue the processing if we have another legal basis to do so. Please note that withdrawing consent will not affect the prior processing of your personal data.
Right to lodge a complaint	If you consider that our processing of your personal data breaches the GDPR or other laws, you may at any time lodge a complaint with the relevant data protection authorities. In Finland, you can contact the Data Protection Ombudsman: www.tietosuoja.fi

To exercise any of your above rights, please contact us using the contact details shown at the beginning of the document. We'll be glad to assist you.

Cookies and tracking

Like most other companies and organisations, we use cookies and similar technologies on our website, online services and in marketing. We will adhere to applicable laws regarding the prerequisites for the processing of your personal data in such ways.

We have described in detail the types of cookies and similar technologies we use as well as their purposes in our [cookie policy](#).

Part 2: Processing of your data

As you are our supplier or contractor (or act as a representative of one), we process your personal data in certain ways in the context of our business relationship. Here we describe the purposes of processing your personal data together with the appropriate legal bases for the processing, as well as the categories of personal data processed together with their retention periods.

Purposes and legal bases of the processing of personal data

According to the GDPR, all processing of personal data must be justified using a legal basis found in the law. First, here is a short description of the legal bases that we use:

Legal basis	Description
Contract (including contract preparation)	As you are our supplier or contractor (or represent one), to perform our contractual obligations we need to process certain categories of your personal data.
Legal obligation	As a commercial company, we have a number of legal obligations to fulfil. For instance, we must keep financial records of our transactions, which may include your personal data.
Consent	In some cases, we may ask for your consent to process your personal data. If we receive your consent, we may process your data on that basis within the limits of the consent. For instance, we use cookies for statistical

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	purposes, which may only be done if we receive your consent.
Legitimate interest	In some cases, we may process your personal data if it's justified for our or someone else's legitimate interest. We only do so after having assessed your rights and freedoms against the importance of the legitimate interest (we conduct a so-called "balancing test").

Here is a complete overview of our purposes of processing and the corresponding legal bases:

Purpose	Legal basis	Examples
Receiving supplies and services	Contract	In order to purchase and receive goods and services as contracted, we need to process some of your personal data.
Managing contractual relationship	Contract	Apart from performing our services, we do a number of things to maintain our contractual relationship with you. We may for instance take notes of our business interactions with you.
	Legitimate interest	To improve the ways we run our business, we may take notes and conduct case studies about our supplier and contractor relationship internally. These may contain some of your personal data.
Billing and debt collection	Contract	As we receive supplies and services from you, we pay your invoices as agreed in our contract. To pay an invoice, we may need to process some of your personal data.

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Accounting and taxation	Legal obligation	We have a legal duty to keep records of our business transactions. For instance, we must collect and retain invoices for a number of years, which may contain your personal data.
Communications and PR	Legal obligation	Sometimes the law requires that we notify you about e.g. changes to our business relationship. If that's the case, we process your personal data to contact you.
Managing risks and protecting interests	Legitimate interest	<p>To manage risks and to protect various business interests, we process certain categories of personal data. For instance, we keep records of our contractual relationships and business dealings for a number of years in case a legal dispute arises.</p> <p>Also, we keep records of the usage of our name, brand and other intellectual property by our partners. These notes may contain your personal data, e.g. regarding social media posts that you have published as a representative of your company.</p>
Technical functioning and security	Legitimate interests	In some cases you may use our tools and services, which collect and process personal data for technical reasons. For instance, to allow you to use our internal reporting tools safely, we need to ensure the proper technical functioning and security of the platform. This often includes processing of personal data such as necessary technical identifiers.

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	Consent	In some cases the tools and services that you use have functions that collect and process your personal data for purposes that are not strictly necessary for safety and technical functioning (e.g. in case of cookies used to improve the visual appeal of an internal reporting platform). If that is the case, you will be asked for your consent to process the data.
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Categories of personal data processed and their retention times

The below table contains a detailed description of the categories of personal data that we process for our various purposes. If a certain category is mandatory by law or contract (e.g. if we need the information to fulfil our legal obligations or to serve you as our customer), we've mentioned that in the table.

The table also contains a list of our retention times for different categories of personal data under a given purpose. Once a specific retention period runs out, we will erase the relevant personal data or anonymise it irreversibly, unless a different purpose with a longer retention period applies.

For instance, we keep personal data for the purposes of communications (like e-mails containing your name and e-mail address) for 1 year. Once the retention period runs out, we will erase the relevant data unless we need to keep it for the purposes of risk management for 3.5 years. If so, we will continue to retain the data until the 3.5-year retention period runs out.

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Purpose	Categories of personal data	Retention period(s)	Examples
Receiving supplies and services <i>All personal data for this purpose are mandatory to facilitate our contractual relationship.</i>	Name, contact details, position	1 year from the end of order and delivery.	To purchase and receive goods and services from you, we need to process your personal data. We will retain the data in case there are for instance immediate issues that have to be fixed.
	Messages and correspondence		
	Delivery information, deliverables		
	Service time		
Managing contractual relationship <i>Personal data marked with (*) are mandatory to facilitate our contractual relationship.</i>	Name, contact details, position (*)	1 year from the end of customer relationship.	To set up, maintain and develop our business relationship with you, we process your personal data. We will retain essential data in your partner dossier, and if the customer relationship ends (or you no longer represent your company or organisation towards us), we will retain the data for an
	Messages and correspondence (*)	5 years maximum however.	
	Signature (*)		
	Preferences and activity (e.g. to give you a corporate gift)		
	Delivery issues, quality shortcomings		

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			additional safety period.
Invoice payments <i>All personal data for this purpose are mandatory to facilitate our contractual relationship as well as to fulfil our legal obligations.</i>	Name, contact details	5 years after the current financial year	As you bill us for your supplies and services, we process your personal data to pay your invoices and keep it in our transaction records. We'll retain that information to keep our business records up to date.
	Invoices, receipts, delivery history		
Accounting and taxation <i>All personal data for this purpose are mandatory to facilitate our contractual relationship as well as to fulfil our legal obligations.</i>	Name, contact details, position	5 years after the current financial year.	As part of our bookkeeping, we collect and retain relevant personal data in our accounting platform as well as financial books and accounts. Some information, such as invoices and receipts, must be retained for a legally prescribed period. During that period, we
	Invoices, receipts	However 6.5 years minimum for information prescribed by financial reporting laws.	

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			will only retain personal data that is contained in those legally prescribed documents.
Communications and PR <i>Personal data marked with (*) are mandatory if you wish to get in contact with us, or if we need to send important notices or updates to you.</i>	Name, contact details, position (*)	2 years from the communication.	We retain personal data from our communications with you, to make sure proof of our correspondence won't be lost too soon, or to make sure that you'll receive any information and updates to matters that are relevant for you.
	Messages and correspondence (*)		
Risk management and protecting interests	Name, contact details, position	3.5 years from the end of active processing.	To manage our risks and to protect your and our legitimate interests, we retain some personal data from the end of active processing in accordance with the other purposes described in this chart.
	Messages and correspondence related to the following		
	Invoices, receipts, delivery history related to delivery issues, quality shortcomings		

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	Contract disputes		<p>For example, once you deliver your supplies or services to us, we retain essential information about any delivery issues or quality shortcomings, disputes, complaints etc., and our messages and correspondence with you relating to those. We do so so that for instance in case of a legal dispute about our contract or the service, any critical evidence will not have been lost.</p>
	Supplier/contractor complaints		
<p>Technical functioning and security</p> <p><i>Personal data marked with (*) are mandatory to the extent that we have a justified interest in</i></p>	Strictly necessary technical identifiers (*)	See our cookie policy	<p>We collect, process and retain technical identifiers in our digital platforms and tools in case we need to address a technical or security issue.</p>

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<p><i>ensuring the technical functioning and security of our electronic services or we have a legal duty to obtain your consent.</i></p>	<p>Not strictly necessary technical identifiers</p>		<p>If we use cookies and similar technologies to collect and process personal data for purposes that are not strictly necessary for the technical functioning and security of the website, we ask for your consent.</p> <p>We record your consent (or denial) in our cookie management tool, which retains the information as described in our cookie policy.</p>
	<p>Consents and prohibitions</p>		