

ALLER'S PRIVACY POLICY

Last updated April 6, 2023

Controller's contact information

In this Privacy Policy, we explain how we process your personal data if you are a customer or potential customer of Aller, a website visitor, a representative of our partners or a representative of our other interest groups.

Aller Media Oy (business ID: 0872238-2) and the group members belonging to the same group with it each time [hereinafter referred to as the "Controller"]

Address: Lintulahdenkuja 10 A, 00500 Helsinki, Finland

Tel.: +358 75 328 5102

E-mail: tietosuoja@aller.com

What do we mean by the different terms?

Data protection is a fundamental right for everyone. It ensures that your rights are upheld when we process your personal data. Data protection determines when and under what conditions personal data can be processed.

We use the following terms in the policy: "personal data", "data subject", "customer", "potential customer" and "interest group".

"Personal data" means the data related to any identified or identifiable natural person. Such data include names, telephone numbers, e-mail addresses, usernames, telephone records, cookie information, customer information and direct marketing choices. Personal data may also include information that does not directly point to a specific individual. Such data include data collected through cookies on websites, for example.

"Data subject" refers to the person whose personal data we process.

"Customer" refers to the consumers as well as the contact persons of companies and organizations who we have a customer or interest group relationship with.

"Potential customer" refers to consumers and company contact persons who we aim to establish a customer relationship with.

"Interest group" refers to consumers and company contact persons we are partnering with (e.g. representatives of companies that produce services for us) or are connected to by other means (e.g. societal decision-makers connected to our community relations).

WHAT PURPOSES ARE MY PERSONAL DATA PROCESSED FOR AND WHAT GROUNDS ARE MY PERSONAL DATA PROCESSED ON?

We process personal data for the following purposes

- delivering products and services,
- invoicing and accounting,
- customer and partner communications,
- managing and developing customer and interest group relationships,
- organizing lotteries and competitions,

- organizing events,
- developing and analyzing products and services,
- ensuring information security,
- preventing and investigating misconduct,
- demonstrating that we comply with legal obligations and defending rights,
- sales,
- marketing,
- and research (for our own products and services and, in some cases, third-party products and services).

Aller processes the personal data of the data subjects for the following purposes (for one or more purposes simultaneously):

Delivering products and services

We process your personal data to deliver products and services and to carry out invoicing if you or the company you represent have, for example, purchased a product or service from us, registered to use our digital services, ordered our content to your e-mail or participated in our events. When you order products by invoice and pay for purchases with a card, we use the strong identification that our partner provides for business-consumer transactions. The processing of personal data is based on implementing and enforcing the rights and obligations that are outlined in an agreement or other commitment between us. We are legally required to process and store data related to invoicing in accounting.

Consumer and business customer communications

We process your personal data in our customer communications to send you customer notifications related to products and services and to send you notifications about potential changes. We may also process your personal data to request feedback related to your customer relationship. The processing of personal data for this purpose is primarily based on our legitimate interests that are related to customer or similar interest group relationships and business development.

Managing, developing and analyzing customer and interest group relationships

We process your personal data to manage, develop and analyze the customer or interest group relationship. This includes improving our communication methods, developing our customer service functions and organizing lotteries and competitions for customers. We develop our operations and content with methods such as surveys that we may send to you by text message or e-mail. We use the survey responses to develop our customer service and products and to create targeted marketing communications for you. In addition, we analyze call records to better understand the customer experience as a whole and to develop our services. The processing of personal data for these purposes is primarily based on our legitimate interests that are related to customer relationships or similar relationships and business development.

We additionally have a legitimate interest for processing personal data to defend rights, prevent and investigate potential misconduct and demonstrate that we comply with legal obligations, such as consumer protection regulations and lotteries legislation.

Marketing

We and our marketing partners may contact you to tell you about new products, services or benefits, provided that you have given us your consent. We may also contact you based on your customer relationship or status. We use your personal data to provide you with relevant content and to customize what we offer. For example, we may make you recommendations or display customized content and ads on our own and third-party services.

When we call you for direct marketing, we record calls to authenticate service transactions, to improve customer service and the quality of sales work, and to protect customer interests and ensure consumer protection.

Finnish law has a so-called post-confirmation procedure, which means that a private customer must conclude an order agreement or contract in writing to make the order binding. The aim of the new order confirmation policy is to further improve the quality and reliability of telemarketing.

Direct marketing carried out through electronic channels requires your consent in certain situations. Please note that not all direct marketing activities require your consent. We may also market products to you based on a legitimate interest related to the customer relationship or your status. You can object to direct marketing or withdraw your consent related to it by following the instructions that we provide in connection with the marketing.

Development and research activities related to products and services

We process your personal data to develop our products and services. For example, we may aim to improve our range of products and content. We may use your personal data to conduct market research. We develop our products and services and content with methods such as surveys that we may send to you via text message or e-mail or through a research platform. We use the survey responses for analytics to develop our to improve our services and products and to create targeted marketing communications for you. The processing of personal data for this purpose is primarily based on our legitimate interests related to business development.

Ensuring information security

We process your personal data to ensure the information security of our services and systems. We do this by collecting security and other technical logs, for example. The processing of personal data for this purpose is primarily based on our legitimate interest to ensure and maintain information security and on our legal obligation to ensure the maintenance of information security and the protection of personal data.

Legitimate interests and the right to object

When we process your data on the basis of legitimate interests, we ensure that the processing is proportionate to your interests and meets your reasonable expectations.

You have the right to object to processing that is based on a legitimate interest. For more information on objecting, see the section "How can I exercise my rights related to my personal data?" in this privacy policy.

WHAT ARE THE DIFFERENT TYPES OF DATA PROCESSED ABOUT ME?

The personal data we process include but are not limited to the following information and the changes made to such information:

Basic information, such as

- first and last name
- contact information (postal address, e-mail address, phone numbers)
- gender
- date of birth
- language (Finnish, Swedish, other)
- selected direct marketing options and consents
- communications targeted at you and related operations and activities
- call recordings with customers and potential customers (if a call in question is recorded) as well as e-mail and online conversations related to customer service on social media channels, for example
- cookies and other technical identifiers
- information security and other technical log data.

Where applicable, we may process the following types of additional information regarding Aller's customers and potential customers based on your role and activity.

- the beginning and ending date of a customer relationship or corresponding relationship, as well as the means by which the relationship began and ended
- campaigns targeted at data subjects (e.g. direct marketing, marketing lotteries and marketing competitions) and their use
- information on which e-mail addresses receive messages, which e-mails are opened, and which links in the e-mail are clicked on
- information related to purchasing , payment, invoicing and collection
- personal identity code if necessary, such as in connection with strong identification
- areas of interest reported by the data subject or other information
- additional information provided voluntarily and in an identifiable form in the context of research activities (in principle, research results are processed anonymously)
- content of feedback and complaints as well as related correspondence and further actions
- user IDs for digital services
- information on the use of digital services and viewed content
- information on cookies sent to the data subject's terminal devices (such as computers and mobile devices) as well as information on similar functionalities and the data collected by them if a person is identifiable based on this information (for example, information on how ads on our sites are clicked)
- information related to investigating and preventing misconduct and risks, and information related to ensuring information security.

In addition, the following types of data are processed regarding representatives of organizations and partners

- current or past job title or position in the organization

Data of data subjects who participated in Aller's events

- dietary information (specific information that the user has provided voluntarily)
- date of birth in connection to events where it is required (e.g. by a shipping company)
- the name(s) and date(s) of birth of traveling companions when they are needed (e.g. by a shipping company).

WHAT SOURCES ARE MY PERSONAL DATA COLLECTED FROM?

We collect personal data in different situations, such as when you subscribe to a magazine or purchase digital services from us, and when you participate in lotteries or competitions. We also collect personal data from reliable external data sources.

We get most of the data from you at the beginning of the customer and interest group relationship and during the relationship when you use our products and services. We may combine the personal data you provide to us at different times and through different channels. For example, we may combine the phone number you gave us when you subscribed to a magazine with an e-mail address you gave to us when you participated in a lottery. When placing gift orders, we receive your information from the person who placed the gift order.

In addition, we receive personal data and personal data updates from the authorities and organizations which offer acquisition and update services for personal data and credit information related to customer and marketing registers. We also receive personal data from public sources, such as company websites and social media channels.

We also receive personal data about company representatives from their colleagues, which means that a company's main contact person can also provide us with personal data about their colleagues.

WHO CAN MY PERSONAL DATA BE SHARED WITH?

During our operations, we work with different partners to whom your personal data may be disclosed depending on the situation and the purpose that the personal data are processed for. When disclosing personal data, we account for the requirements of statutory legislation. We sign the appropriate personal data processing agreements and contracts with all our partners. By signing the agreements and contracts, the partners commit to processing personal data securely and confidentially. We also share data between companies belonging to the Aller Group.

Depending on the situation, our partners may act as independent controllers, in which case the partner determines the purposes and means of processing data, or as processors of personal

data, in which case the personal data is processed only for the purposes determined by Aller in accordance with this Privacy Policy and applicable legislation.

Personal data may be disclosed to the following recipients:

IT and service providers

We use various service providers in our operations. The services include customer service, services related to research activities, event services, payment services, services providing strong identification, debt collection services and various IT and data center services.

Sales and marketing partners

During marketing campaigns and when selling products and services, we transfer data such as e-mail addresses related to target demographics to systems that are managed by our partners. We use the systems to target and send marketing communications.

If you have also given your consent for electronic direct marketing by Aller's partners, your data may be disclosed to partners for electronic direct marketing purposes. The data may be shared for these purposes only if the partner's intended purpose for using data is not in conflict with the purposes we have defined in this Privacy Policy. We only disclose the minimum amount of information that our partners need about you (mainly only your contact information) for their intended, agreed upon purpose. You have the right to object to the processing of your personal data for direct marketing purposes. For instructions on how to object, see the section "How can I exercise my rights related to my personal data?" in this Privacy Policy.

We may, at our discretion, share the personal data of participants in our events with other event participants, if sharing data is appropriate due to the nature of the event (for example, an event organized for interest groups).

We also share data with authorities in relation to misconduct, statutory obligations and rights.

In addition, we act as joint controllers with social media service providers when we have a community page on a social media platform, such as Twitter or Facebook.

Meta, Twitter, TikTok and other social media service providers are responsible for ensuring the information security of the services they provide (such as Instagram and Facebook) and for making sure that their services comply with data protection regulations. They are similarly responsible for ensuring that the rights of the data subjects are enforced in the services. We use the data obtained through social media services for marketing, communication and customer service purposes, including buying and displaying advertisements, measuring the reach of advertising, identifying potential customers and processing contact requests.

For more information on how social media platforms process personal data, see the privacy policies below:

[Meta \(Facebook and Instagram\)](#)

[TikTok](#)

[Twitter](#)

WILL MY PERSONAL DATA BE TRANSFERRED OUTSIDE THE EU?

We mainly process your personal data in systems and databases located in the European Union. However, some of the partners we work with or the services they provide are located outside the European Economic Area, which means that your personal data is also transferred outside the area.

For example, we transfer data outside the EU when the IT system or cloud service used for processing personal data is located on a server outside the EEA, in which case the data processed in the system is transferred outside the EEA.

In situations where your personal data is transferred to third countries, we take security measures to maintain the high level of protection for personal data that European data protection legislation requires even after personal data are transferred. These measures include the European Commission's standard contractual clauses as part of the agreements that bind our partners. In addition, we require compliance with appropriate technical and other data protection measures.

IS MY PERSONAL DATA USED FOR PROFILING?

We use analytics and modelling which result in profiling that allows us to produce personalized content or target marketing communications.

We use your personal data for profiling, meaning that we analyze and predict your personal preferences, interests or behavior when you use our services and websites.

By doing this, we can serve you better, develop our products and services to better meet your expectations and target content and marketing in the best way possible.

We do not make automated individual decisions with legal consequences or consequences of comparable severity. The consequences of our profiling mostly appear in the form of personalized content and targeted advertising to selected target demographics. Profiling tools are used in the pricing of orders. The price of a customer's order varies based on the order's duration, current season and order history. We perform profiling on the basis of a legitimate interest based on a customer relationship or other similar relationship.

HOW LONG WILL MY PERSONAL DATA BE PROCESSED FOR?

The processing times for the personal data of different groups are determined differently, depending on the grounds for processing and legislation.

We will process your personal data for as long as we have valid grounds for doing so based on this Privacy Policy, and for a reasonable period thereafter.

The processing period of different groups is determined based on the following criteria:

Consumer customers

We may process your personal data for as long as you are our customer and until the end of the fourth year after the year your customership ended.

After this, we may transfer the necessary personal data to our marketing register and treat you as a potential customer again.

Business customer representatives

We may process your personal data for as long as you represent our business customer and until the end of the fourth year after the year your customership ended.

After this, we may transfer the necessary personal data to our marketing register and treat you as a potential business customer representative again.

Potential consumer customers and representatives of potential business customers

We may process your personal data for the time being until you become our customer or until you request your information to be erased from our marketing register.

Interest group members

We can process your personal data for as long as you are a member of an interest group (e.g. representing our partner) and until the end of the calendar year when you have ended your customership.

HOW CAN I EXERCISE MY RIGHTS RELATED TO MY PERSONAL DATA?

You can exercise your data protection rights by using the following forms. You can also write a personal request and send it to tietosuoja@aller.com

As a data subject, you can influence the processing of your personal data in different ways. We will respond to your request within a month of receiving it. In exceptional circumstances, we may extend the deadline by up to two months.

If you wish to inspect your data or request your data to be erased, you can fill in the forms below and send them to tietosuoja@aller.com. If you have any other requests, itemize a free-form request and deliver it through the customer service channel of your choice.

Please note that we must always be able to identify the person who requests the data/processing through information such as a name, address, customer number, phone number and/or e-mail address.

The rights that the data protection regulations give you are not completely unlimited. For example, we cannot erase data if legislation that applies to us requires the storage of personal data. In addition, the extent of the rights depends on what processing criterion the processing of your personal data is based on. This means that you may not be able to exercise all of the rights listed below in all situations.

Aller

- Data inspection request: [Inspection request form](#)
- Request for erasure of data (including objection to processing): [Erasure request form](#)
- Objection to direct marketing: Make a free-form request where you tell us what kind of direct marketing (postal, phone, SMS or e-mail) your request applies to
- Forbidding the sharing of personal data with partners for their postal and/or telemarketing purposes or contact information updates: Make a free-form request where you tell us what kind of direct marketing (postal and/or telemarketing) your request applies to
- If you have any other requests, make a free-form request specifying what your request concerns

Send the form or itemized request by e-mailing tietosuoja@aller.com , or send a letter to Aller Media Oy, Lintulahdenkuja 10 A, FI-00500 Helsinki, Finland.

If you have a subscription to an Aller magazine or use Aller's services, you can also contact our customer service

asiakaspalvelu@aller.fi

tel. +358 75 328 5102 (8.4 cents/min + Inf/mcf, queuing included)

You have the following rights:

a) The right to access the personal data collected about you. To enforce this right, we can provide you with a report on the personal data that we process, based on your appropriate and identified request.

b) The right to request that your personal data be rectified. If you notice that your data is inaccurate or lacking, you can submit a rectification request to us.

c) The right to request the erasure of the data collected about you. Please note that we cannot erase data if there are legitimate grounds to retain them, such as a legal obligation, a contractual relationship or the demonstration of rights and obligations.

d) The right to request that we restrict the processing of personal data collected about you. You may ask us to restrict the processing of your personal data if:

1. you contest the accuracy of the personal data we have about you
2. the processing is unlawful and you request the restriction of the data's use instead of erasure
3. we no longer require the personal data for the purposes of the processing, but you require them for the establishment, exercise or defense of legal claims
4. you have objected to the processing of your personal data and are awaiting verification on whether our legitimate ground override yours.

e) The right to object to the processing of your personal data. You have the right to object to the processing of your personal data on grounds related to your particular situation when the processing of data is based on our or a third party's legitimate interest. We have the right to continue processing the personal data despite an objection to processing if we have a particularly compelling reason for the processing. Particularly compelling reasons can include investigating, presenting or defending a legal claim or misconduct, for example.

In addition, you always have the right to object to the processing of your personal data for direct marketing. You do not need to justify an objection to direct marketing.

f) The right to transfer the data you have provided from one system to another. If the automatic processing of your personal data is based on your consent or an agreement, you have the right to receive the data you have submitted to us in a structured, commonly used and machine-readable format, and you have the right to transfer the data to another controller.

g) The right to withdraw your consent. If your personal data is processed based on your consent, you always have the right to withdraw your consent.

h) The right to lodge a complaint with a supervisory authority. If a dispute concerning the processing of your personal data cannot be resolved amicably between us, you have the right to refer the matter to the [Data Protection Ombudsman](#).

HOW IS THE DATA PROTECTION INFORMATION IN THIS POLICY UPDATED?

We will update the data protection information as necessary when we develop our services or processing methods and when there are changes to legislation, for example.

We are constantly developing our business operations, which can lead to changes in the processing of personal data.

We will update the Privacy Policy to reflect the changed practices whenever necessary. Changes may also be based on changes in legislation. We recommend that you review the content of the Privacy Policy regularly.

If we begin to process your personal data for any purposes other than what your personal data were originally collected for, we will notify you about the matter and about the updated Privacy Policy before further processing.

With regard to other changes, we will inform you on our website about updates to the Privacy Policy.

PROCESSING OF PERSONAL DATA FOR THE PURPOSES OF JOURNALISM

The personal data of the data subject may be processed for several purposes at Aller. For example, the same person can be included in Aller's commercial customer register (e.g. as a magazine subscriber) or be the subject of articles in magazines published by Aller. We do not use the information in our customer register when writing articles. The information related to the articles is collected independently as part of editorial work. Similarly, the data collected for the creation of editorial content will only be used to create the content.

The General Data Protection Regulation which regulates the processing of personal data applies to editorial work in a limited capacity. Editorial work includes writing and commenting on stories and content produced by readers (e.g. news tips and pictures and videos taken by readers). Journalists are allowed to process people's personal data more freely based on freedom of expression and freedom of information.

Even in editorial work, personal data are processed lawfully, appropriately and transparently with regard to the subjects of the articles. The data are collected for purposes of journalism and are not processed afterwards in any manner that would be non-compliant with these purposes.

As a data controller, Aller has a legal obligation to ensure that the personal data collected by editorial personnel are appropriately protected by various technical and organizational means.

Limitations to the data subject's rights

Based on the exception related to editorial work, the data subject does not have the rights of the data subject under the Data Protection Regulation. As a result, the data subject does not have certain rights, such as the right to request that personal data be erased from articles or from the background material collected by editorial personnel. Similarly, the data subject does not have the right to inspect what data editorial personnel have collected about them, when personal data is processed for the purposes of journalism. Through these limitations, the legislature ensures that the activities of the media and freedom of expression are not unduly restricted.

ARE COOKIES SAVED ON MY COMPUTER?

We use cookies, device identifiers and other similar technologies on our websites to collect information about the pages that users visit, for example. A cookie is a small text file stored on your device when you visit our website. Cookies contain an anonymous, unique identifier that allows us to identify and count the different browsers that visit our website. Cookies allow us to know whether you have used our services before, for example. We use the information to improve website functionality and to better understand our users. The data enable us to target content recommendations to different user groups, ensuring that we can offer you the content that most interests you when you visit our websites. Our goal is to provide you with a successful customer experience.

It is not possible to identify the user with individual cookie data, but it is possible to connect information obtained from identifiers to information that was obtained about the same user in other contexts, if the user has given their consent. The processing practices related to the processing of personal data are described in more detail in this Privacy Policy in the section "What purposes are my personal data processed for and what grounds are my personal data processed on?"

We also use third-party identifiers and analytics cookies, such as social media cookies, to develop the website's functionality and to be able to offer targeted content to visitors. We use content sharing partners such as Facebook, Instagram, YouTube and Twitter. Some third parties, such as Google and Facebook, process cookies as data controllers. Partners can store cookie identifiers with various content embeds and then use the data collected through the embedded content for their own purposes. Partners may also share the data with their partners.

You can find more information about the different types of cookies we use and their lifecycle through our cookie tool:

[Seiska.fi](#) and [Katso.fi](#)

[OmaAller.fi](#) and [Aller.fi](#)

Examples of data collected through cookies and similar technologies and how the data are used:

1) Essential for website and service functionality

- Storing information related to the browser and device, including resolution, device type, operating system, and IP address
- Identifiers that we use to ensure information security and prevent misconduct
- We identify errors on our sites and in our services and are able to monitor performance
- Managing and storing cookie consent
- Advertising and content distribution
- Connecting different devices to each other
- Use of automatically transmitted device information to identify devices

2) Cookies for analytics, product development and development of user understanding

- Loaded pages and other information related to the use of the online service
- User-targeted ads and marketing content, and their clicks
- With analytics, we are able to track things like the number of website visitors when an individual browser can be identified with cookie data.
- Analytics helps us to better understand our users, and it also provides important information for product development.

3) Cookies related to targeting advertising, displaying content, and measuring advertising content:

- Our goal is to show users advertisements that interest them. Aller and its partners use identifiers to create different target demographics and advertising profiles for personalized advertising. In this context, we collect data on things like interests, browsing information and targeting ads based on the user's approximate location. In addition to using information from our sites, we also use information collected from other sites when creating target demographics and targeting advertising.
- Cookies are also used to collect information on user activities, application or webpage browsing histories, interests, demographic features or locations in order to create or edit an advertising profile. Aller and the partners we use may use the same profile and target demographic information to target advertising based on factors like interests.
- In addition to targeting advertising, we use cookies and other technologies to measure the impact and effectiveness of advertising and produced content based on how users have responded to advertising.

Some cookies are always active while others are based on your consent. In our view, we have a legitimate interest for processing the data collected through cookies in addition to the data we process with your consent. The purposes for using data based on legitimate interests include:

- Selecting standard ads
- Creating a personalized ad profile
- Creating a personalized content profile
- Selecting personalized content
- Measuring advertising and its effectiveness

- Measuring content and its effectiveness
- Application of market research to build user understanding
- Product development
- Information security, preventing misconduct and correcting errors

In our assessment, the processing practices described above do not conflict with your fundamental rights or freedoms. The assessment has taken into account the relationship between you and Aller Media Oy and the information provided.

You also can also influence the use of cookies by using the cookie tool available on Aller's website and by adjusting the cookie settings of your browser to prevent the use of cookies. When making changes, please note that restricting cookies may affect the functionality of our websites and services.

[Seiska.fi](#) and [Katso.fi](#)

[OmaAller.fi](#) and [Aller.fi](#)