

## Privacy Notice

Citycon respects your privacy and protects your personal data. Personal data include all the information that can identify you as an individual (your name, address, etc.) This privacy notice (hereinafter “**Privacy Notice**”) describes what personal data Citycon collects and processes and how in connection with consumer marketing, and how Citycon ensures the privacy and security of information collected and processed by it.

It is important to us for you to trust the way we process your personal data (for example, we would never sell or transfer your personal data to another party in a way that is incompatible with our Privacy Notice). You are always welcome to contact us regarding any matter.

### Data controller

Citycon Finland Oy (business ID 2424293-6) acts as controller for the shopping centres IsoKarhu, IsoKristiina, Koskikeskus, Lippulaiva, Myyrmanni and Trio.

Citycon Oyj (business ID 0699505-3) acts as the controller for the shopping centre Iso Omena.

### Name of the register

Customer register for consumer marketing

### Collection of personal data

**Data that you disclose to us.** The data that we collect is typically disclosed by you when you:

- subscribe to our newsletter;
- complete our customer surveys;
- participate in competitions or raffles that we organise;
- provide feedback to us, for example through the feedback function on our website;
- visit our shopping centres or commercial facilities; or
- contact us in any other way.

**Data collected in other ways.** Examples of data that we obtain from other sources and that we can link to your other personal data that we process are:

- information that we obtain from the social media services you use, such as Facebook, LinkedIn and Instagram.

For us to gain access to your information in the registers and systems of third parties, the third party in question must have the right to disclose

such data concerning you. In addition, personal data may be collected and updated for purposes specified in our Privacy Policy based on information obtained from publicly available sources and the authorities or from other third parties as permitted by applicable legislation. Such updates to personal data are carried out manually or automatically.

When you visit our websites, we collect information about your device (computer or mobile device) with the help of cookies and other similar techniques, such as pixel tags, which store information in your web browser or your device in a way similar to cookies.

### Information about cookies

Similar to many other companies, Citycon uses cookies or other technologies on its website to store information about the way the website is used in order to improve the usability of the website and offer the best possible experience to users visiting the website, as well as to enable user profiling and effectively targeted marketing. This section describes cookies and how we use them and other similar technologies that store information.

Technically speaking, cookies are short text files that a web server uploads to the user's device. This enables the collection of information about how and when the website is used and what other websites the user is interested in.

In addition to cookies, the range of technologies that Citycon uses and that enable the storage of information about the website usage include tracking pixels, such as pixel tags, Flash cookies (locally shared objects), HTML5 local storage, device identifiers, operating system identifiers, transparent GIF files and web beacons.

If you do not wish to receive cookies when browsing the our website, you may change your cookie preferences from the website footer "Cookie Policy". The Cookie Policy also tells you what cookies are being used on the website. If you decide to decline cookies, some website functionalities or services may not work properly.

### Personal data processed by us

**Contact details.** To enable us to send you newsletters , we process your contact details, including your first name and email address.

**Device-related information.** In order to offer the most appropriate Services (including Applications) for your device and to provide the best possible support, we collect information about your device's IP address, language, web browser, operating system and display resolution as well as information on how and when you use our websites.

**Information from customer surveys.** We may contact you asking you to voluntarily complete customer surveys. If you decide to complete surveys, we will process the personal data that is included in and comes up in them.

**Your communication with Citycon.** This refers to the information that you include in your email messages to us or that you provide to us through other means of communication. For example, when you contact us, we collect and process information, such as the relevant circumstances, your contact details, the date and time you contact us, as well as other essential information that we need to provide assistance and handle each individual case.

### **How we use your personal data, and the legal basis for processing**

**To communicate with you.** We process personal data that you have provided us, if required, to effectively communicate with you.

**To carry out customer surveys.** Your contact information can be used to carry out customer surveys in order to, for example, hear your opinions about our shopping centres. Participation in our customer surveys is voluntary. The data collected in connection with the surveys are used as a basis for Citycon's legitimate interest in improving its services.

**To compile statistics.** Your personal data are used to compile aggregate statistics, which means that you cannot be identified from the data. This processing is based on legitimate interests, such as our interest in being able to develop and improve our current and future services.

**To market Citycon.** Supported by our legitimate interest of marketing Citycon, we use marketing technology for sending newsletters (see below for a description of how we share your personal data).

**To protect Citycon, you and others.** Citycon may, based on its legitimate interest, process your personal data, if required, to protect or exercise our, your and other parties' rights, business interests or other legitimate interests. This may be the case if, for example, you or someone else presents claims against us.

**In connection with a business transfer.** Should Citycon, for strategic or business-related reasons, decide to sell or transfer its business or shopping centres, either fully or partly, your personal data may be shared with or transferred to the parties involved in the transaction. This processing is based on our legitimate interest of being able to develop our operations.

**With your consent.** Your personal data may also be used for specific purposes other than those described above, provided that you request us or give us consent to do so. For example, with your consent, Citycon may publish a reference submitted by you or include you in articles about Citycon or its shopping centres, in order to market Citycon or its shopping centres. You always have the right to withdraw your consent if that consent forms the legal basis for our processing of your personal data.

### **Transfer of personal data and transfer of data outside the EU and EEA**

For specific purposes, Citycon must share your personal data with other reliable persons and companies:

**Service providers.** Your personal data will be shared with select companies that help us provide our Services. We use Citycon Oyj's systems for providing certain services, and part of the IT systems we have outsourced to external service providers. These services include servers, mail delivery, marketing, and analytical tools. These companies can process your personal data in accordance with instructions supplied by us or to comply with their legal obligations. All Citycon suppliers are carefully vetted to ensure that your personal data are in safe hands.

**Authorities and legal contexts.** We may be obliged to share your personal data with the authorities, courts, and other parties. This may be required, for example, by law, in connection with a legal process or to fulfil the request of a supervisory authority.

We transfer personal data outside of the EU or the EEA. If personal data must be processed outside the EU or EEA, we ensure that the data is transferred based on an adequacy decision or our subcontractor has undertaken to comply with the standard contractual clauses approved by the EU Commission regarding the processing of personal data and when necessary, applies additional security measures.

Your personal data may be further transferred to third parties, without your consent, if the law or official regulations oblige such a transfer or if Citycon, after careful consideration, considers there to be justified grounds for transferring the data, for example, in special situations in which we deem it necessary for protecting your or another person's vital interest. Moreover, in connection with a business acquisition, we may transfer your personal data to the new owners of a shopping centre. We will inform you about this separately after the completion of the acquisition.

### **Protection and duration of retention of your data**

Citycon complies with good administrative practices, the duty of care and the obligation to protect when processing your personal data and at all times strives to take every possible and reasonable measure to safeguard your privacy and prevent it from being violated at any stage of your personal data being processed. When processing your personal

data, we always strive to ensure that processing is appropriate, warranted and necessary in view of the purposes described. We do not process personal data more than necessary with respect to the purposes and, where possible, we strive to anonymise data when they are no longer needed for identifying individual customers.

Citycon and any of Citycon's cooperation partners that process the personal data of customers will adopt the necessary technical and organisational measures to protect personal data against unauthorised access, destruction, modification, distribution, transfer and other illegal processing of personal data.

Only authorised employees of Citycon or Citycon's cooperation partners who need to process personal data because of their work duties have access to your personal data. In addition, we have strict administrative measures in place regarding the access rights of employees at Citycon or Citycon's cooperation partners who have access to databases in which user data are retained. Our registers and databases, as well as the data stored in them are protected, for example, through access restrictions and with passwords which are only granted to persons who pass our strict vetting process.

Citycon retains your personal data only for as long as we have your consent or is justified for the purpose of personal data processing, after which the data are deleted or anonymised. The duration of storage of personal data depends on the type of personal data involved. The same personal data may be stored for different purposes. For example, some personal data may be retained due to legal requirements, even though they have been deleted or anonymised for other purposes.

Personal data whose processing is legally based on your consent will be deleted if you withdraw your consent or when your data are anonymised, as described above. Your data will also be retained for a longer period if required by legislation. In this case, your data will only be used for complying with the relevant obligations.

Additionally, we take appropriate reasonable action to ensure that no personal data that is incompatible, outdated or erroneous as regards its processing purpose is kept. We will correct or deleted such data without undue delay.

### **Your rights as a data subject**

You have the right to review your personal data stored in our customer register and systems as well as the right to request that any inaccurate, outdated, unnecessary or illegal data be rectified or deleted.

Where the processing of personal data is based on your consent, you also have the right to at any time withdraw your consent or modify it. Withdrawal of consent does not affect the legality of processing carried out before the withdrawal. Please contact us by sending an email to [info@citycon.com](mailto:info@citycon.com) if you wish to withdraw your consent.

As regards personal data that you have supplied to the customer register and that is processed automatically based on your consent, you have the right to review such personal data as well as request that they be transferred to another controller.

You have the right to contact and lodge a complaint with the Data Protection Authority (Office of the Data Protection Ombudsman) if you suspect that we have processed your personal data inappropriately. Further information is available at [www.tietosuoja.fi/en](http://www.tietosuoja.fi/en). You can also contact the supervisory authority in your country of residence or employment.

You also have the right to object to the processing of your data on personal grounds if the processing of personal data is based on a legitimate interest. In your demand, you are required to specify the particular personal situation on the basis of which you object to the processing of your data. We can deny your request only based on grounds specified in law.

#### Contact information

If you have any questions about the processing of your personal data or if you wish to exercise your rights described above, please contact our Data Protection Officer by email at [privacy@citycon.com](mailto:privacy@citycon.com).

If you have any questions about our consumer marketing, please contact us by email at [info@citycon.com](mailto:info@citycon.com)