

Privacy policy of JAM Advisors Oy's customer and marketing

This privacy policy describes how we collect, use, store and protect your personal data. By 'You', we refer to our customers, potential customers, the authorised representatives of our customers or other related parties, such as our customers' contact persons and actual beneficiaries.

1 GROUNDS AND PURPOSE OF PROCESSING PERSONAL DATA

We collect and process personal data for several different purposes. We utilise personal data to fulfil our legislated duties and our obligations defined in our customer agreements, and we also use personal data to make you offers and give you advice on our products and services.

The purpose of processing personal data is to:

- fulfil the agreement made with the customer and our duties (such as the obligation to know our customer and their risk classification),
- maintain our customer relationship (investment advice for customers, for example),
- plan and develop new services (including their testing),
- monitor the customer's or other data subject's user licence and log information concerning the online service,
- market the products and services and make offers (including electronic direct marketing). JAM does not perform automated decision-making based on personal data. We will monitor the data subjects' use of websites and the online service and their behaviour. We utilise these data for service development in a way that enables us to offer the best-suited products and services to our customers.

2 PROCESSED DATA

In connection to our customer and marketing register, we will process the following personal data of customers or other data subjects:

- **the data subject's basic information** including name, date of birth, personal identity code, nationality, customer number, profession and education;
- **the data subject's contact information** including e-mail address, telephone number, address information;
- **information concerning the company, its contact persons and influential persons** including the name of the contact person, their contact information, profession and education, name of the actual beneficiaries, their personal identity code and position in the company;
- **data concerning the customer relationship and the agreement**, such as information of the previous investment recommendations and other service information (including phone call recordings,

correspondence with the data subject, information describing their financial situation, bank's contact information, the customer's authentication documents);

- **data collected to meet authority obligations:** customer classification in accordance with the Act on Investment Services and related information, political influence, taxation country/countries, origin of funds;
- **the online service's user and log data of the customer or other data subject** e.g. name, e-mail address and phone number.

Disclosing the personal information collected for the purpose of knowing the customer is a requirement for establishing a contract relationship and/or a customer relationship. Without the necessary personal data, we cannot provide investment services.

3 DATA SOURCE

Data are primarily received from the data subject themselves.

In addition to this, personal data (name, personal/community/customer code, date of birth, position at the company) can be collected and updated for the purposes described in this privacy policy from the authority registers to which said data have been saved for general use. Such authority registers include the Population Register, Trade and Association Registers and the Business Information System YTJ. Personal data can also be collected from contacting and marketing service providers for marketing the products and services. Checking and updating these data will be done manually.

4 TRANSFERRING AND DISCLOSING PERSONAL DATA

We have outsourced part of our IT administration to external service providers, and personal data will be stored on servers maintained and protected by them. These external service providers will act as personal data processors in their part, and an agreement required by the regulations will be signed with them concerning the methods of processing personal data.

We will disclose your personal data if it is necessary to perform our agreement obligations, for example in connection with performing a fund subscription. In such cases, we may also need to transfer your data outside the EU/EEA, in which case we will ensure the appropriate protective measures of this transfer (e.g. we will apply the EU-approved standard contract clauses). Data may be disclosed to authorities based on compelling regulations.

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Additionally, data can be disclosed within the group for group-level IT administration purposes, to manage customer relationships and for marketing purposes.

5 DATA PROTECTION AND PERIODS OF STORING THE DATA

JAM maintains the confidentiality of personal data. Only the employees that are entitled to process personal data for the purposes of their work are authorised to access our customer data. Prohibition on the use and disclosure of confidential information applies to our entire personnel. Each user has their own login and password for the system. The data will be collected to databases that are protected with firewalls, passwords and other technical measures. Databases and their backups are located in locked facilities and only certain appointed persons have access to them.

We instruct the employees taking part in personal data processing in the appropriate processing of personal data and their confidentiality. JAM also continuously ensures the adequate expertise of its staff. In order to monitor and control the processing operations, JAM may occasionally review the log data with regard to the processed personal data of service users.

We will store personal data as long as necessary for their purpose of use, for example for the duration of the customer relationship's validity or the minimum storage time required by the regulation.

We will assess the necessity of storing data regularly, taking into account the applicable laws. In addition to this, we implement reasonable measures to ensure that no incompatible, outdated or incorrect personal data with regard to their purpose of use will be stored in the database about the data subject. We will rectify or erase such data without delay.

6 THE DATA SUBJECT'S RIGHTS

As a data subject, you have the right to inspect the data concerning you that are saved in the register and claim the data to be rectified or erased. You also have the right

to cancel your consent to collecting your data, amend it or object to the processing.

We ask you to take into account that we have a legislated duty to maintain some data with regard to providing investment services for a certain period of time.

You have the right to prohibit us from targeting marketing measures at you. You can submit this prohibition by email, by phone or by visiting our office. If you wish, you can also identify which communication tool we can use to send you marketing messages.

As a data subject, you have, in accordance with the General Data Protection Regulation, the right to object to or request restricting the processing of your data as well as submit a complaint about personal data processing to the supervisory authority.

For special personal reasons, you have the right to object to the processing measures targeted at your personal data when the basis for processing the data is the customer relationship between us. In connection to making the claim, you need to identify the special reason due to which you are objecting to the processing. We can refuse the claim only on legal grounds.

7 FURTHER INFORMATION AND QUESTIONS

If you have any questions about this privacy policy, you can contact the person in charge of JAM's privacy policy:

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8 CHANGES TO THE PRIVACY POLICY

This policy will be updated as our operations develop or regulations change. If these changes are significant, we will attempt to notify you of them also in other ways, such as by e-mail or by publishing a notification on our website. We recommend visiting our website regularly and reviewing the potential changes of the policy.