

## GRAANUL INVEST

### General Terms and Conditions for Personal Data Processing

Effective as of March 1, 2024

#### INTRODUCTION

This document on the terms and conditions for personal data processing (hereinafter the “**Terms**”) describes how **AS Graanul Invest** (registry code 10990825) and its group companies process personal data. These Terms apply in all Estonian companies that are part of the AS Graanul Invest group, including all AS Graanul Invest subsidiaries in Estonia.

The purpose of the Terms is to provide our clients and partners with clear and transparent information on how AS Graanul Invest or our group companies may process your personal data when you are using our services. If you have concluded a contract with an AS Graanul Invest group company, the terms of the concluded contract may specify the terms and legal basis for personal data processing.

If you have additional questions about how we process your personal data or, if you wish to forward us requests for exercising the rights involved in personal data processing, please contact us using the contact details provided in the section “Contact” below or contact your direct supervisor or human resources officer.

AS Graanul Invest may from time to time amend these terms and conditions for personal data processing. The updated terms and conditions for personal data processing are published on the webpage [www.graanulinvest.com](http://www.graanulinvest.com).

#### 1. TERMS AND DEFINITIONS

“ <b>GDPR</b> ”	Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation).
“ <b>Graanul Invest</b> ”	AS GRAANUL INVEST (registry code 10990825, address Humala tn 2, 10617 In Tallinn, Estonia) or any Graanul Invest group company.
“ <b>Graanul Invest group</b> ”	All companies that are part of the Graanul Invest group, incl. AS Graanul Invest’s subsidiaries Helme Graanul OÜ, Osula Graanul OÜ, Ebavere Graanul OÜ, Graanul Energia OÜ, Helme Energia OÜ, Imavere Energia OÜ, Osula Energia OÜ, Graanul Varad OÜ, Graanul Hake AS.
“ <b>Personal data</b> ”	Any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an

identifier, such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

<b>“Applicable law”</b>	All valid European Union legal acts and all valid legal acts of the Republic of Estonia, including, but not limited to, the national implementation acts for GDPR which are applicable during the validity of these terms and conditions or shall be applicable after the terms and conditions enter into force.
<b>“Data subject”</b>	A natural person whose data is processed by a Graanul Invest group company.
<b>“Processing”</b>	Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
<b>“Controller”</b>	A natural or legal person, public sector authority, agency or other body who, alone or jointly with others, determines the purposes and means of the personal data processing. For the purposes of these Terms, the controller is Graanul Invest or a Graanul Invest company who processes the personal data in any given case.
<b>“Processor”</b>	A natural or legal person, public sector authority, agency or other body who processes the personal data on behalf of the controller.
<b>“Website”</b>	The website of Graanul Invest <a href="http://www.graanulinvest.com">www.graanulinvest.com</a> .

## **2. WHEN AND FOR WHAT PURPOSES DO WE PROCESS PERSONAL DATA?**

- 2.1. Graanul Invest processes personal data primarily for the purposes of providing services to its clients and partners and for performing its contractual obligations to its clients and partners. If a client or partner of Graanul Invest is a data subject, the legal basis for personal data processing is article 6(1)(b) of the GDPR - processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. If the client or partner is a legal person, we process data that are necessary to determine the right of representation.
- 2.2. Graanul Invest may process personal data also where it is required to perform a legal obligation applicable to Graanul Invest. For example, in case a court requests personal data from Graanul Invest under an applicable court ruling or court judgement or a law enforcement agency requests personal data under an applicable regulation. Also, if Graanul Invest is obligated to keep personal data, for example, under the Accounting Act or other applicable legal acts. In case of such processing, the legal basis is article 6(1)(c) of the GDPR - processing is necessary for compliance with a legal obligation to which the controller is subject.
- 2.3. In certain cases Graanul Invest may process personal data also if it is necessary for the purposes of the legitimate interests pursued by Graanul Invest, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. In such case, the legal basis for personal data processing is article 6(1)(f) of the GDPR.
- 2.4. Depending on the legal relationship between you and Graanul Invest, Graanul Invest may process the following data about you:

<b>Purpose</b>	<b>Collected personal data</b>
Provision of website	Data collected with cookies (read the separate section on using cookies)
Provision of services and sale of products to natural persons	<b>Contact details:</b> name, e-mail address, telephone number, address; <b>Contract terms:</b> ordered service or products; <b>Payment details:</b> information about the payment method used and if you wish to pay by invoice, the data required to prepare an invoice.
Provision of services and sale of products to natural persons	<b>Contact details of the legal person's representative:</b> name, e-mail address, telephone number; <b>Basis of right of representation:</b> position/job at legal person
Ensuring security on Graanul Invest territory	<b>Security camera recordings:</b> when you are present on Graanul Invest territory, we may record your image with security cameras (read the separate section on using security cameras).

### **3. TRANSFER OF PERSONAL DATA AND USE OF PROCESSORS**

- 3.1. Graanul Invest does not transfer personal data to third parties, except when possessing the legitimate right under applicable law.
- 3.2. Graanul Invest may use processors for personal data processing or share personal data between Graanul Invest group companies for internal administration purposes. The processors of Graanul Invest, who in limited circumstances may process the personal data are, for example, IT-service providers (server service providers, IT-developers) or the providers of other support services. Graanul Invest uses as processors only such partners whose reliability Graanul Invest has verified and who have committed to processing personal data in compliance with applicable law.

### **4. RETENTION OF PERSONAL DATA**

- 4.1. Graanul Invest does not retain personal data longer than it is necessary based on the purpose of personal data processing or under applicable law.
- 4.2. Graanul Invest applies the following retention periods under the law:
  - 4.2.1. we retain accounting documents for 7 years under the Accounting Act;
  - 4.2.2. as a rule, we retain the data collected upon the conclusion of a contract, for which a longer retention period does not arise from applicable law, as long as we need to for the performance of the contract throughout the validity of the contract or for 10 years after the expiry of the contract, based on Graanul Invest's legitimate interest pursuant to article 6(1)(f) of the GDPR and the limitation period set out in the General Part of the Civil Code Act.
- 4.3. If you wish to receive more detailed information on the retention periods of the personal data pertaining to you, please contact us using the contact details provided in the section "Contact" below.

### **5. USE OF SECURITY CAMERAS**

- 5.1. Under the applicable law, Graanul Invest is entitled to use surveillance equipment for the protection of persons and property. For that purpose, Graanul Invest uses security cameras on its territory and in relation to this we also process personal data.
- 5.2. The use of security cameras is necessary, first and foremost, on Graanul Invest's territory, incl. production areas, in order to ensure security, prevent and process security incidents and ensure the safety of Graanul Invest's property and people, incl. employees.

- 5.3. The legal basis for the use of security cameras is Graanul Invest's legitimate interest under article 6(1)(f) of the GDPR.
- 5.4. Graanul Invest's surveillance equipment comprises of cameras installed on the territory which record the territory around the clock (24/7), the security cameras are stationary and do not record sound.
- 5.5. Graanul Invest uses cameras in the public spaces on Graanul Invest's territory, incl. the warehouse territory, production areas, outside territories and other public spaces used by the employees or our visitors. The purpose of using cameras is to monitor activity on Graanul Invest's territory, incl. production areas, selected passageways in the buildings and courtyards.
- 5.6. Security cameras are never installed in areas where employees of Graanul Invest, clients of Graanul Invest or other persons who may be in the camera's vision can presume complete privacy. For example, cameras are never in dressings rooms, restrooms etc.
- 5.7. When security cameras are used, there is always a sign informing of the use of a camera in the security camera's surveillance area, i.e. a sign depicting a camera and/or the words "VIDEO SURVEILLANCE". In the absence of a sign, cameras are not used.
- 5.8. Graanul Invest does not generally transfer camera recordings to third parties, except when they are entitled or obliged to under applicable law. For example, under applicable law Graanul Invest may transfer recordings to authorities, for example, when it is required to investigate committed violations or other incidents by authorised persons, e.g. the Police and Border Guard Board, under applicable law.
- 5.9. Access to security camera recordings is limited to a group of people who require access strictly in relation to the performance of their duties. For example, director of the Graanul Invest plant has access to the recordings.
- 5.10. Graanul Invest stores camera recordings in accordance with reasonable organisational and technical security measures in order to protect personal data from accidental, unauthorised processing or disclosure. Camera recordings are stored in Graanul Invest's local server room. Camera recordings are not transferred outside of the European Union.
- 5.11. Graanul Invest retains camera recordings for up to 30 days as of the making of the recording, depending on the specific recording, except when during this time proceedings have been initiated for investigating an offence or another incident committed during the same period and in relation to this it is necessary to retain the specific recording for a longer period.
- 5.12. All Graanul Invest employees, clients or other third persons who have been present on Graanul Invest's territory and whose image Graanul Invest has recorded have the right to access the recording containing their image. Graanul Invest cannot hand over a camera recording to an employee or third person if the recording has been deleted by the time of receiving the request for access to the recording. Additionally, we ask you to take into account that for the purposes of protecting the rights and interests of other persons in the recording, we need to edit their image so that they cannot be identified (blur the image), therefore, we cannot provide immediate access.
- 5.13. If you wish to gain access to a recording containing your image, if you wish to receive a copy of the recording or have any questions regarding Graanul Invest's practice with personal data processing, incl. specifying questions regarding the use of security cameras, please contact the human resources officer, data protection officer or your direct supervisor.

## **6. USE OF COOKIES**

- 6.1. Graanul Invest's website uses cookies. Cookies are small text files containing information stored on the computer and used for tracking or identification.
- 6.2. The website uses the following types of cookies:
  - 6.2.1. Session cookies: session cookies i.e. temporary cookies - used each time you use the website and deleted after closing the browser. Temporary cookies are necessary to enable to functions of the website.

6.2.2. Third party cookies: we use third party cookies (Google Analytics) for the better functioning and provision of the website and collecting statistics. You can read the privacy policy and terms and conditions of third parties on the cookie provider's website: <https://www.google.com/policies/technologies/cookies/>.

6.3. More specifically, the website uses the following cookies:

Cookie	Description	Validity	Type
cms_web	The cookie is provided by the web server when a new session is created and it is used to identify the user with the session key (number). This key is stored in cookies by default.	1 year	Website performance
__utma	This cookie is provided by Google Analytics and it is used to distinguish users and sessions. The cookie is created when the JavaScript library executes and no existing __utma cookies exist. The cookie is updated every time data is sent to Google Analytics.	2 years	Website performance
__utmc	The cookie is provided by Google Analytics and is deleted when the user closes the browser. Ga.js does not use the cookie. The cookie is used for interoperability with urchin.js, an older version of Google Analytics and operated in conjunction with the __utmb cookie to determine whether the user was in a new session/visit.	Valid until the end of the browser session	Website performance
__utmz	The cookie is provided by Google Analytics and is used to store the traffic source or campaign that explains how the user reached your site.	6 months	Website performance
__utmt	This cookie is provided by Google Analytics and it is used to throttle request rate.	10 minutes	Website performance
__utmb	This cookie is provided by Google Analytics. The cookie is used to determine new sessions/visits. The cookie is created when the JavaScript library executes and no existing __utma cookies exist. The cookie is updated every time data is sent to Google Analytics.	30 minutes	Website performance

6.4. You have the right to disable cookies at any time by changing your browser settings. When doing so, please take into account that some website features may not function properly. Cookies can be disabled by following the instructions under the browser's "help" section. More information on how cookies operate or how to disable cookies is also available on the website [www.allaboutcookies.org](http://www.allaboutcookies.org).

## 7. RIGHTS OF THE DATA SUBJECT

- 7.1. Graanul Invest shall ensure all the rights of the data subject arising from applicable law.
- 7.2. All data subjects shall *inter alia* have the following rights:
  - 7.2.1. right to access: the right to ask at any time whether Graanul Invest holds any personal data about them or not and receive information about which personal data Graanul Invest is processing about them;
  - 7.2.2. right to rectification: the right to request from Graanul Invest the supplementation or rectification of their personal data if these are insufficient, incomplete or inaccurate;
  - 7.2.3. right to object: the right to submit objections to Graanul Invest concerning the processing of one's personal data, for example, if the personal data is processed on the basis of the legitimate interests of Graanul Invest;
  - 7.2.4. right to erasure: the right to request the erasure of personal data, for example, if the personal data are processed based on the data subject's consent and the data subject has withdrawn their consent;
  - 7.2.5. right to restriction of processing: the right to obtain from Graanul Invest the restriction of processing under the applicable law, for example, where Graanul Invest no longer needs the personal data for the purposes of the processing or where the data subject has objected to processing;
  - 7.2.6. right to withdraw the consent for processing personal data: if the processing of personal data is based on the data subject's consent, the data subject has the right to withdraw the consent given to Graanul Invest at any time;
  - 7.2.7. right to data portability: the right to receive from Graanul Invest the personal data that the employee has provided to Graanul Invest and which are processed on the basis of the data subject's consent or for the performance of a contract concluded with the data subject, in writing or in a generally used electronic format and, if technically possible, request that Graanul Invest transfers these data to another controller;
  - 7.2.8. right to lodge a complaint: if the employee is of the opinion that the processing of their personal data has violated their rights, they have the right at any time to file this claim to the Data Protection Inspectorate – Tatari 39, 10134 Tallinn, [info@aki.ee](mailto:info@aki.ee), [www.aki.ee](http://www.aki.ee).
- 7.3. The rights of the data subject listed in this section regarding the processing of their personal data are not absolute rights. In certain cases, the rights of other data subjects or the rights or legal obligations of Graanul Invest may limit the rights of the data subject.
- 7.4. In order to exercise the rights pertaining to the processing of personal data or to submit requests concerning the processing of personal data, please contact us using the contact details provided in the section "Contact" below or contact your direct supervisor, human resources officer or data protection officer.

## 8. SECURITY OF PERSONAL DATA

- 8.1. Graanul Invest shall ensure the security of personal data processing, for the purposes of protecting personal data from accidental or unauthorised processing, disclosure or destruction.
- 8.2. Taking into account the state of the art and costs of implementation, and the nature, scope, context and purposes of the personal data processing as well as the risk to the rights and freedoms of data subjects, of varying likelihood and severity, that may result from personal data processing, Graanul Invest shall apply appropriate technical and organisational measures upon personal data processing to ensure the protection of personal data.

## 9. CONTACT

- 9.1. In case of questions concerning the processing of personal data or in order to submit requests concerning the processing of personal data, please contact Graanul Invest or Graanul Invest's data protection officer by e-mail or contact your direct supervisor.

**The contact details of the data protection officer of Graanul Invest are:**

Ruth Altvälja, e-mail: [ruth.altvalja@graanulinvest.com](mailto:ruth.altvalja@graanulinvest.com)

**The contact details of Graanul Invest are:**

AS Graanul Invest

Humala 2, Tallinn 10617

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