

## DESCRIPTION OF PERSONAL DATA PROCESSING OF PARTIES IN PROPERTY DEAL

1. The purpose of the Description of personal data processing of parties in property deal (hereinafter – the Description) is to set the requirements for processing and protection of Personal data of the Real estate owners (sellers) or buyers; Representatives / employees of real estate owners (sellers) or buyers, former owners of real estate, shareholders, members of gov. bodies and beneficiaries of sellers / buyers, other persons specified in Real Estate Register extracts processed in the Company.
2. If this Description does not define certain rules, general provisions of the Description of personal data processing of employees, members of the governing bodies, shareholders (representatives), beneficiaries, authorised persons shall apply.
3. **Joint controllers of the Personal data** processed for the purposes below are: Silvestica Green Forest Finland Oy, Company code 2839510-4, business seat address: c/o Revico Grant Thornton Oy PB 18, 00271, Finland, and Silvestica Forest AB, Company code 559107-2797, business seat: Stationsgatan 30, 302 45 Halmstad, Kingdom of Sweden, phone No. +46(0)705-132430, electronic mail address: [ekonomi@crkforest.se](mailto:ekonomi@crkforest.se).
4. The personal data is processed according to the below-stated conditions:

Purpose	Basis	Data categories	Storage term	Needs to be provided
Collection and verification of data for real estate transactions and share purchase agreements (property deals); Concluding a check of reliability of the other party (natural person or shareholders, members of gov. bodies and beneficiaries of a legal entity)	Contract conclusion and execution; The legitimate interest of the Company in identifying the signatory, executing person, performing legal and financial assessment, check of reliability of the other party; Legal acts.	Contact / identification data, property data, participation in politics, sanctions imposed.	2 years after the expiration of the sale-purchase contract or for 1 month if contract was not concluded;  Personal data contained in the documents is stored for the terms established in the Local Laws	<ul style="list-style-type: none"> <li>• Necessary for signing and implementing sale-purchase contract and following the requirements of legal acts</li> </ul>
Conducting internal accounting	Legal acts	Identification data; financial data; position; workplace	10 years after the operation	We process data already at our possession
If you sell property:				
<ul style="list-style-type: none"> <li>• Conclusion and execution of contracts for the purchase of goods / services;</li> <li>• Storage of contracts;</li> <li>• Protection of legitimate interests of the</li> </ul>	<ul style="list-style-type: none"> <li>• Contract conclusion and execution or legitimate interest of the Company in identifying the signatory, executing person (contract execution);</li> <li>• Legal acts;</li> <li>• Legitimate interest of the Company (to express or defend against claims).</li> </ul>	Contact / identification data; bank account details; credentials; contract execution data	During and for 5 years after the expiration of the supply contract;  The personal data contained in the documents are stored under the Local Laws	<ul style="list-style-type: none"> <li>• Necessary for signing and implementing sales contract</li> <li>• Necessary according to the requirements of legal acts</li> <li>• We process data already at our</li> </ul>

Company (claims management).				possession
If you buy property:				
<ul style="list-style-type: none"> <li>• Conclusion and execution of contracts for the sale of goods / services;</li> <li>• Storage of contracts;</li> <li>• Protection of legitimate interests of the Company (claims management).</li> </ul>	<ul style="list-style-type: none"> <li>• Contract conclusion and execution or legitimate interest of the Company in identifying the signatory, executing person (contract execution);</li> <li>• Legal acts;</li> <li>• Legitimate interest of the Company (to express or defend against claims).</li> </ul>	Contact / identification data; bank account details; credentials; contract execution data	<p>During and for 5 years after the expiration of the sale/service contract;</p> <p>Personal data contained in the documents is stored for the terms established in the Local Laws</p>	<ul style="list-style-type: none"> <li>• Necessary for signing and implementing sales contract</li> <li>• Necessary according to the requirements of legal acts</li> <li>• We process data already at our possession</li> </ul>
Debt administration	Legitimate interest of the Company (to express claims)	Contact / identification data; debt / services / goods sold / payments data	<p>Until full debt recovery;</p> <p>Personal data contained in the documents are stored under the Local Laws</p>	We process data already at our possession

5. If Data subject fails to provide his/her personal data which we have the obligation to process by the legal acts or which is necessary for signing/implementing the sale-purchase contract, or such data is necessary in order to secure the legitimate interest of the Company – the Company will not be able to sign/implement the aale-purchase contract with the Data subject.
6. The personal data can be disclosed to the following data recipients: Tax Administrator, Banks, Auditors, Lawyers, Courts, Dispute Settlement Authorities, State Registers, Consultants, CRK Forest Management AB, Owners and administrators of Information Systems, accounting service providers, debt recovery service providers.
7. The Company shall protect personal data by ensuring its confidentiality, integrity and limited availability. Confidentiality means that personal data is not disclosed to persons who do not have access to these data. The Company ensures the confidentiality of personal data. Integrity means that personal data should be accurate and relevant for the purpose for which it is being processed. Limited availability means that only authorized persons (consumers) have access to and manage personal data for legitimate and defined purposes.
8. The Company shall take the necessary technical and organizational measures to protect personal data against unauthorized processing and / or loss. The Company installs the appropriate hardware and software, applies the necessary security measures (including physical and electronic access control).
9. Personal Data subject has the following rights:
  - 9.1. To know (be informed) about his/her Personal data processing.
  - 9.2. To familiarise with his/her Personal data processed.
  - 9.3. To request for correction of his/her Personal data.
  - 9.4. To request for erasure of his/her Personal data ('the right to be forgotten').
  - 9.5. To request for restriction of his/her Personal data processing.
  - 9.6. To data portability.
  - 9.7. To disagree with his/her Personal data processing.

10. Requests related to Data subject's personal data shall be submitted to the Company by registered letter to: c/o Revico Grant Thornton Oy PB 18, 00271, Finland or e-mail address: [ekonomi@crkforest.se](mailto:ekonomi@crkforest.se).
11. The requests must include: information enabling the Data subject to be identified; requested actions; personal data for which such actions are requested. Only reasonable requests are responded. The Company examines the application within 30 (thirty) calendar days of its receiving, without any additional requests for time received, and informs the Data subject of the action taken on the request. The Data subject shall be informed in the form in which the request was made.
12. The Data subject may complain to the supervisory authority of the actions (omissions) of the Company in relation to the exercise of the Data subject's rights:

Office of the Data Protection Ombudsman  
Visiting address: Ratapihantie 9, 6th floor, 00520 Helsinki  
Postal address: P.O. Box 800, 00521 Helsinki, Finland  
E-mail: [tietosuoja@om.fi](mailto:tietosuoja@om.fi)  
Telephone: +358 (0)2956 66700

13. When processing personal data, the Company does not apply automatic decision-making.
14. Personal data is not transferred to a third country or to an international organization.
15. This Description may be reviewed once per calendar year on the initiative of the Data controller and / or in the exchange of legislation governing the processing of personal data.
16. Amendments to the Description shall take effect from the date of their approval.
17. This Description is valid until is changed or cancelled by the Company.