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| <p>1. DATA CONTROLLER</p> | <p>3Step IT Group Oy Business ID 2087590-4 Mechelininkatu 1a 00180 Helsinki Finland</p> <p>which is the parent company of 3 Step IT group, and one or several of the following subsidiaries together (hereinafter referred to as “3 Step IT”), whichever in each customer relationship is applicable:</p> <p>FINLAND: 3 Step IT Oy Business ID 2161942-7 Mechelininkatu 1a 00180 Helsinki Finland</p> <p>DENMARK: 3 Step IT A/S Business ID 26106427 Vandtårnsvej 62, 2860 Søborg Denmark</p> <p>NORWAY: 3 Step IT AS Business ID 878703812 Wergelandsveien 7 0167 Oslo Norway</p> <p>SWEDEN: 3 Step IT Sweden AB Business ID 556488-0218 Box 1556 581 15 Linköping Sweden</p> <p>AddPro Finans AB Business ID 556861-4357 Box 1566 58115 Linköping</p> <p>Advania Finance AB Business ID 556737-7840 Box 1566 58115 Linköping</p> <p>ESTONIA: 3 Step IT OÜ Business ID 10731756 Narva mnt 7d, Tallinn 10117 Estonia</p> <p>LATVIA: 3 Step IT SIA Business ID 40003717838 Vilandes iela 3 LV-1010, Riga Latvia</p> <p>LITHUANIA: UAB 3Step IT Business ID 300059934 Juozo Balčikonio g. 9, LT-08247 Vilnius Lithuania</p> |
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DATA REGISTER DESCRIPTION: Customer identification register (KYC/CDD) Last updated: 2019-10-01

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| <p>2. CONTACT PERSON IN MATTERS REGARDING DATA REGISTER</p> | <p>Data Protection Office 3 Step IT Group Oy dpo(at)3stepit.com</p> |
| <p>3. NAME OF DATA REGISTER</p> | <p>Customer identification register (Know Your Customer / Customer Due Diligence)</p> |
| <p>4. PURPOSE OF AND LEGAL GROUNDS FOR PROCESSING OF PERSONAL DATA</p> | <p>The purpose of processing personal data included in the customer identification register is to comply with the obligations laid down in applicable anti-money laundering legislation valid from time to time (EU directive or local relevant regulation on the the prevention of the use of the financial system for the purposes of money laundering or terrorist financing) and international financial sanctions laid out by EU/UN and United States.</p> <p>Processing of personal data included in this register is based on:</p> <ul style="list-style-type: none"> - <u>(with respect to collecting customer’s contact details)</u> the legitimate interests pursued by 3 Step IT (General Data Protection Regulation (EU) 2016/679, Article 6(1) subsection (f)). - <u>(with respect to European Union / United Nations financial sanctions)</u> necessity for compliance with a legal obligation to which 3 Step IT is subject (General Data Protection Regulation (EU) 2016/679, Article 6(1) subsection (c)); and - <u>(with respect to United States financial sanctions)</u> the consent given by the data subject (General Data Protection Regulation (EU) 2016/679, Article 6(1) subsection (a)) and the legitimate interests pursued by 3 Step IT (General Data Protection Regulation (EU) 2016/679, Article 6(1) subsection (f)). The legitimate interest of the data controller is compliance with financial sanctions imposed by United States which 3 Step IT has contractually undertaken to comply with. |
| <p>5. DATA CONTENT OF REGISTER</p> | <p>The types of personal data collected:</p> <p>Name, date of birth, city of birth, nationality, personal identity number, address, information included in ID copy, information included in possible proof of address, PEP-status and details of such PEP-status.</p> <p>The categories of data subjects:</p> <p>Customer or representatives of the customer (authorised signatories or employees of customer without signatory status), possible beneficial owners of the customer, next-of-kin and close business associates of PEP-persons.</p> |
| <p>6. REGULAR SOURCES OF DATA</p> | <p>Information provided by the customer or customer’s representatives or beneficial owners or public sources.</p> <p>Provision of the personal data is a requirement necessary to enter into a contract with the customer or to pursue such customer relationship. The data subject is not obliged to provide personal data, however, provision of personal data might be a prerequisite for using of 3 Step IT’s services or products.</p> |

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| 7. REGULAR TRANSFERS OF DATA OR TRANSFERS OUTSIDE THE EU OR EUROPEAN ECONOMIC AREA | <p>In connection with assigning concluded lease agreements to its refinancing partners, 3 Step IT transfers copies of the collected personal data to the selected refinancing partner, who process personal data as data controller in accordance with its own privacy policy. 3 Step IT will deliver a copy of the refinancing partner's privacy policy upon request.</p> <p>The personal data may be also transferred to other entities within 3 Step IT group.</p> <p>The personal data will not be transferred outside EU/EEA.</p> |
| 8. STORAGE PERIOD | <p>The personal data will be retained as long as required by applicable laws and regulations.</p> <p>Currently the retention period is at minimum five years after the end of the business relationship with the customer.</p> |
| 9. PRINCIPLES FOR THE PROTECTION OF THE DATA REGISTER | <p>3 Step IT's information systems are protected by passwords, firewalls, anti-virus software and other generally applied security measures. Only pre-designated employees of 3 Step IT have access to the personal data contained in the data register.</p> |

Additional information about 3 Step IT's data processing principles can be found in 3 Step IT's Privacy Policy, which is available at: <https://www.3stepit.com/content/privacy-and-cookies-policy-2>