

## PRIVACY NOTICE

### 1. General information

This Privacy Notice describes how Kamux Group (later “we” or “Kamux”) processes personal data; what personal data Kamux collects, how the data is used and to whom the data is disclosed, and how the data subject can control the processing. The Privacy Notice also informs about the obligations Kamux follows when processing personal data.

Kamux’s business concept is to focus on used car sales. This Privacy Notice applies to all products and services offered by Kamux in the stores, showrooms, online and through marketing (later “Products” and “Services”), and the video surveillance at Kamux premises. This Privacy Notice covers all persons whose personal data are processed (later “data subjects”, “you”) in connection to the Products and Services described above or the video surveillance. It applies also, where applicable, to the partners and stakeholders involved in the business.

Kamux is dedicated to protecting the privacy of the data subjects and commits to process their personal data in compliance with the European Union’s General Data Protection Regulation (2016/679), (later “GDPR”) and other applicable privacy laws and regulations.

*Personal data* refers to information, which allows a person to be directly or indirectly identified as an individual person, as defined the GDPR. Examples of personal data: name, email address and date of birth.

### 2. Controller and contact information and data protection officer

#### 2.1. Controller

Kamux Group  
Address: Parolantie 66, 13130 Hämeenlinna, Finland  
Contact Details: Email: [privacy@kamux.fi](mailto:privacy@kamux.fi)

Kamux Group is a group of companies whose parent company is listed on the Nasdaq Helsinki. Companies belonging to the Kamux Group: Kamux Oyj, Kamux Suomi Oy, Suomen Autorahaksi Oy, KMX Holding AB, Kamux AB and Kamux Auto GmbH.

#### 2.2. Data protection officer

Data Protection Officer: communication director Satu Ojala  
Contact Details: Email: [privacy@kamux.fi](mailto:privacy@kamux.fi)

### 3. Purpose and legal basis of the processing of personal data

We only process personal data that are relevant for the purpose it has been collected or obtained for, and we process the data in compliance with laws and regulations.

#### Sales, purchase, customer services, administration and internal development

Personal data are processed for the sales/purchase of our products and services including orders/purchases, delivery, invoicing, warranties, complaints and quality assurance.

Personal data of customers and potential customers are also processed for customer services, customer relationship management, customer communications (including customer feedback and satisfaction surveys), quality assurance, service planning and development, analysis, generating statistics and administrative purposes such as consent and rights management.

**Updated 6.2.2020**

## **Kamux Group**

The legal bases of the processing are fulfilment of requests of the data subject prior to entering into a contract, e.g. requests for information or quotation or purchase orders, the performance of a contract or preparation of a contract with Kamux and the legitimate interests of Kamux. The legitimate interests include administration and development of the Products and Services, and operations which are necessary for carrying out pre-contractual measures such as inquiries concerning our Products or Services.

### **Marketing**

Personal data are used by Kamux and its partners to various kinds of marketing including promotional events, competitions, surveys and market research. Legal basis of the processing is the legitimate interest of Kamux for developing and promoting the business, and your consent when it is required for certain processing. You have the right to object to the processing of your Personal data to marketing purposes (opt-out).

When Personal data are used to electronic direct marketing (such as contacting you via SMS and email), the marketing will be based on your consent (opt-in) which you can withdraw at any time. However, Kamux can send direct marketing regarding similar product and services you have acquired from us, and using the electronic contact information provided by you. You have the right to object to this kind of marketing too, and it is possible to do it also in advance (opt-out).

We arrange promotional events and competitions where we collect information provided by you. Participation is voluntary and thus the processing related to the event or competition is based on your consent which you can withdraw at any time.

### **Tracking and automated decision making including profiling**

We track service usage and behaviour on our web pages for service development and to offer you better service and customer experience. We also utilise the data for marketing and internal development. See separate Cookie Policy ([www.kamux.fi/cookiepolicy](http://www.kamux.fi/cookiepolicy), [www.kamux.se/cookiepolicy](http://www.kamux.se/cookiepolicy), [www.kamux.de/cookiepolicy](http://www.kamux.de/cookiepolicy), [www.kamux.com/cookiepolicy](http://www.kamux.com/cookiepolicy)).

### **Information security, physical security including video surveillance and vehicle and tax fraud prevention**

Personal data, including video surveillance recordings, are processed for preventing, detecting and remediating fraud or other potentially prohibited or illegal activities. They are also processed for protecting data and property. Personal data can be used for investigating possible security incidents, crimes or damages.

The purpose of the video surveillance is also to ensure personal safety of people working or visiting the premises. The video cameras are located at Kamux premises. They record people working and visiting the areas covered by the cameras. The premises have signs that inform people of the video surveillance.

Processing related to security and safety is a legal obligation, but some of the security measures are done in the legitimate interests of Kamux such as protection of our property.

### **Legal obligations**

We also process personal data when required by applicable law and/or to comply with the laws and regulations (e.g. accounting or other specific legislation). The legal obligation is the basis for the processing.

### **Purposes that require your consent**

Your consent is required for certain types of processing of your personal data such as electronic direct marketing (newsletter order) and processing of sensitive data. We do not intend to collect sensitive personal data, but data subjects may submit it voluntarily, and then we process it based on consent.

For the processing of personal data that you have given your consent you can withdraw your consent at any time regarding further processing of your personal data. See instructions further down ([o Rights of the data subjects and the Supervisory authority](#)). We will comply with such request unless there is another legitimate ground to process the data.

#### 4. Personal data processed and sources of information

We collect and processes only personal data which is relevant and necessary for the purposes outlined this Privacy Notice.

We collect the following categories of data:

Categories of data	Examples of personal data
Identity and contact information	name, personal identification code / date of birth, address, phone number, email, country, driver's license identification data
Customer relation data and contract details	Term of customer relationship and the way of creation and termination of the relationship, data of product or service contracts, purchase orders, cancellations and deliveries, customer feed-back and claims, callback and chat service data, responses to customer, market surveys and research and other interactions, banking data, invoice and payment data, debt collection, possible credit application information including creditworthiness and specific contract terms
Vehicle data	Licence number, owner, model
Insurance application data	Damage history, trade-in car data, drivers and driving habits
Consent and objections	Consent or objection to electronic direct marketing
Images, recordings	Copy of the driver's license, video surveillance recordings
Electronic identification and behaviour data	Browsing data, search data and cookie data, see separate Cookie policy
Marketing data	Marketing efforts performed, preferences and interests of the data subject, other information provided by the data subject, marketing permissions and consents (opt-in), restrictions and bans (opt-out) Information relevant to the marketing event or scope of the marketing such as preferences
"Know your customer" data	The required information under the Act on Detecting and Preventing Money Laundering and Terrorist Financing (444/2017).

When you order/purchase our Products and Services or otherwise enter into a contract with us, or when we have a legal obligation to ask for your data, we need your personal data to fulfil the contract and/or our legal obligations. We will inform you at the time which personal data are mandatory to be provided by you. Personal identification codes are processed only for purposes permitted by law when it is important to identify the data subject for example in the sales or purchase of the products, granting of credit or debt collection. Only contact information (excluding personal identification code) and marketing data as defined above are processed for the purposes of direct marketing to potential and former customers.

We collect the information from the following sources:

- Information you provide e.g. when contacting us, visiting us, utilising our Products and Services (including web services and social media), participating in our marketing activities and when entering into a contract with us / ordering our Products and Services.
- Automatically gathered information when you use our Products and Services e.g. when you use our online services.

Updated 6.2.2020

## Kamux Group

- Information from service providers such as vehicle repair services, vehicle information services and marketing service providers
- Information from third parties such as population register services, local vehicle registration services and other public and private registers
  - Publicly accessible sources such as contact data services, vehicle data services and credit data services
- Video surveillance recording in our premises

### 5. Retention of Personal data

The personal data we collect are retained for the period necessary to fulfil the purposes outlined in this Privacy Notice unless a longer retention period is required by law (e.g. accounting or reporting obligations), or we need it to protect our legal rights. Thereafter, the personal data will be deleted within a reasonable timeframe or rendered anonymous.

The retention periods depend on the purpose of the processing and type of the information.

Personal data and retention periods are listed in the table below:

Categories of personal data	Retention period or criteria used to determine the period
Test drive permit data	9 months (to be able to respond to fines or other consequences)
Prospect customer data	4 weeks if no offer/contract is established
Contact customer data	6 months if no contract is established
Contract customer data (including complaints, instalment contract data)	10 years after the financial year/accounting period (legal obligation)
Insurance confirmation data, Insurance document data, data of approved credit	6 months
Kamux callback and chat service data	1 month
Requests for using the rights of the data subject	Until the request has been submitted
Video surveillance recordings	Max 12 months (depending on the capacity of the recorder)
Marketing consents	Until unsubscribing
Cookies/analytics data	(see Cookie Policy)
Marketing data	Deleted within 90 days

### 6. Recipients of Personal data

Your personal data will be accessible by companies included in Kamux Group.

Personal data are also shared with service providers and third parties. We will only share personal data to the extent necessary for performing the service (e.g. to provide, maintain, develop and secure the service).

We disclose your personal data to the following recipients:

Category of recipients	Recipients
------------------------	------------

Updated 6.2.2020

### Kamux Group

Registration <ul style="list-style-type: none"><li>• Registration authorities (except for Germany)</li><li>• Registration partner, Germany</li></ul>	Local Vehicle registration (Trafi, Bilvision, Transportstyrelsen)  Astorga, Holger Slabik
Insurance companies	IF, Folksam, Lähi-Tapiola, Nordea, OP, POP-vakuutus, Fennia, Pohjantähti, Turva, A-vakuutus, Car Garantie, Länsförsäkringar
Credit companies	Santander, OP, Nordea, Nordean Joustoluotto, AKF, BDK, DNB, Lähi-Tapiola, SVEA Ekonomi, SAV-rahoitus, Handelsbanken joustorahoitus, Danske Bank, Ecster
Car repair/service companies	About 4000 totally in the whole Group
IT/web service providers / partners	Houston, IT4B, Cloupoint, Fiarone, Decens, Mediam, Amazon AWS, Four Components, Digia, Leanware, Innofactor, Lekane, Investis
Banking	Basware, Analyste Oy, Clausion Oy
Video surveillance	Securitas
Insider information, share owners, AGM register	Euroclear, Ticker
Consulting	PWC
Arkivbolaget	Safebox
Marketing service providers including advertising and personalized content	Google AdWords, Adform Display network, Google Display Network, Facebook, MailChimp / Mailparser.io, Cybot (Cookiebot service provider), Otavamedia, Instagram, LinkedIn, Custobar, Fonecta
Statistics	Google Analytics, Hotjar

### Transfer outside EU/EEA

When Personal data are transferred outside EU/EEA, the transfer is secured by legal measures, appropriate safeguards. The following recipients may process data outside EU/EEA:

Recipient	Transfer safeguard
MailChimp	Privacy Shield
Investis Inc, Investis Corporate Communications Private Limited	Standard Contractual Clauses with Investis in accordance with Data Protection Legislation
Ticker	EU-U.S. Privacy Shield

### Other transfers

In addition, we may share your information in connection with any merger, sale of our assets, or a financing or acquisition of all or a portion of our business and in connection with other similar arrangements.

Personal data are also disclosed to third parties if required under any applicable law or regulation or order by competent authorities, and to investigate possible infringing use of the Products and Services as well as to guarantee the safety of the Products and Services.

### 7. Protection of Personal data

We commit to follow to the security provisions of applicable data protection regulations, as well as to process personal data in compliance with good processing practices.

Personal data are protected with appropriate technical and organizational measures. We store the information in locked environments with limited physical access rights and secure IT-environments. The IT-environments are protected with firewalls and other adequate security technics, and advanced monitoring is done 24/7. Our personnel and processors that process personal data are obliged to keep personal data strictly confidential. Access to personal data is only granted to those employees that need the information to perform their work tasks. Employees and processors have personal IDs and passwords.

**Updated 6.2.2020**

## **Kamux Group**

The digital camera recordings are kept in a locked space with limited access. The recordings can only be accessed by authorized personnel and can only be shared when required by authorities according to laws and regulations. Old recordings are regularly destroyed when a new recording overwrites them. However, recordings related to damages or crimes are saved as long as necessary for the investigation and other legal measures.

We inform the authorities and users/data subjects of data breaches according to applicable information security and data protection regulation(s).

Rights of the data subjects and the Supervisory authority

The data subjects have the rights set out in the applicable data protection legislation.

### **Right to access and verify**

You have the right to have confirmed if we process your personal data.

You have the right to verify and access your personal data and to request us to provide you the data in writing or electronically.

### **Right to correct and erase (right to be forgotten)**

You have the right to have corrected any incorrect or incomplete personal data. You have also the right to request us to remove data.

We also remove, correct and complete incorrect, unnecessary, incomplete or outdated data on our own initiative when we notice such data.

### **Right to data portability and to object and restrict processing**

You have the right to transmit your data to another controller.

You have the right to request us to restrict processing of your personal data in accordance with the conditions set out in the data protection legislation. We will also restrict the processing of your personal data if we cannot correct or remove incorrect data, or if there is any uncertainty related to request to erase your data.

You have the right to object to processing of your personal data for certain purposes. You have the right to deny any processing or transferring of data for direct marketing.

### **Right to withdraw consent**

If the processing of your personal data is based on consent, you have the right to withdraw consent at any time. The withdrawal does not affect the lawfulness of processing based on consent before its withdrawal.

You can deny any direct marketing and withdraw your consent regarding electronic direct marketing by following the instructions received in connection to the marketing communication (e.g. in the marketing email or SMS).

You can always withdraw any consent including parental consent by contacting Kamux using the contact information provided in the beginning of this document (1 General information

### **How to exercise the rights of the data subjects**

After receiving all the required information of your request (incl. confirmation of identity), we will start the processing of your request. We will do our best effort to process your request within a period of one (1) month.

We may reject requests that are unreasonably repetitive, excessive or manifestly unfounded.

#### **Right to access, correct and erase your personal data.**

You can find out what personal data concerning you are stored in the customer register and ask to correct or erase data by

- using the web service: [<https://gdpr.asiakastieto.fi/#/identify/kamux>]. The service uses strong electronic identification to confirm your identity.

Updated 6.2.2020

## Kamux Group

- visiting a Kamux store and filling a paper request form. To be able to submit the form, you need to prove your identity with an official document, so we can ensure your personal data won't be disclosed to outsiders.

### **Right to object and restrict processing, data portability, object to direct marketing and withdraw consent.**

You can exercise these rights by using the contact information in the beginning of this privacy notice.

### **Right to lodge a complaint with the supervisory authority**

In case you consider our processing activities of your Personal data to be inconsistent with the General Data Protection Regulation (GDPR) (EU) 2016/679, you have the right to complain to the local data protection supervisory authority.

### **Data Protection Official**

Local data protection officials in Finland, Sweden and Germany.

## **8. Changes to this Privacy Notice**

We may change this Privacy Notice from time to time, whenever necessary. All changes hereto will be made available on our websites ([kamux.fi](http://kamux.fi)/[kamux.se](http://kamux.se)/[kamux.de](http://kamux.de)/[kamux.com](http://kamux.com)) where we publish this Privacy Notice.

This Privacy Notice has been first published on

24.5.2018.

### Change history

Version number	Change description	Date
2nd	Updated the list of 1. Marketing service providers including advertising and personalized content and 2. Statistics	19.7.2019
3rd	Updated the list of 1. Marketing service providers including advertising and personalized content and 2. Insider information and 3. retention period of test permits	11.12.2019
4th	Purpose and legal basis of the processing of personal data	6.2.2020