

FILE DESCRIPTION

Personal Data Act (523/99), Section 10

Drawn up: 11 February 2008

1. File controller	Name Hartwall Ltd
	Contact information (visiting address) Atomitie 2a 00371 Helsinki Finland (postal address) PO Box 200 00371 Helsinki Finland Tel. +358 20 717 111
2. Person responsible for the file and/or contact person	Birgitta Suomalainen
	Hartwall Ltd Kasaajankatu 13 PO Box 44 15101 Lahti Finland Tel. +358 20 717 161
3. Name of file (the name must describe the data content of the file)	Personal data file
4. Purpose for processing personal data and purpose of file (If the processing of personal data is outsourced, this can be mentioned here)	<p>The purpose for processing personal data is to handle the services and functions offered on the website (such as competitions), to reply to enquiries and feedback sent by visitors to the website, to reimburse consumers for financial loss resulting from Hartwall's products, to develop products and services, for statistical purposes and to handle other aspects of customer relations.</p> <p>In addition, personal data will be used with the consent of the data subject for Hartwall Ltd's marketing purposes.</p>

<p>5. Content of the data file (E.g. name, address, telephone number etc. of data subject)</p>	<p>The personal data file contains the following data about the data subject (the data in bold are mandatory in order to provide the service):</p> <ul style="list-style-type: none"> • Forenames and surname • Telephone number • Postal address • Email address • Prohibition on using and disclosing data for marketing purposes • Bank account number for paying possible product discounts <p>The name and address of the data subject will be changed upon notification by the data subject.</p>
<p>6. Data sources *</p> <p>(What data is obtained, from whom and on what grounds e.g. consent or legal provision)</p>	<p>Data subjects send via Hartwall's website all their personal data that is to be saved in the file to the personal file controller. Hartwall Ltd does not collect data for the personal data file from other data sources.</p>
<p>7. Disclosure of data and transfer of data beyond the EU or European economic area</p>	<p>Hartwall Ltd does not disclose or transfer data from the personal data file within Finland or beyond the EU or European economic area.</p>
<p>8. Principles of personal data file protection</p>	<p>A. Manual materials (storage place and protection)</p> <p>B. Data saved on computers (principles governing user rights to the personal data file and monitoring of use as well as the physical protection of equipment)</p> <p>All data associated with Hartwall Ltd's private customers are treated as confidential and processed accordingly; this information may not be divulged to anyone other than those who need it during the course of their work and who are bound by the obligation to maintain confidentiality.</p>

* Section 10 of the Personal Data Act does not specifically require data to be entered but it is appropriate to enter data from the perspective of the data subjects' rights to inspect that data. It also describes the content of the data file.