

Privacy Statement

We process certain categories of your personal data which we receive from you in the course of the SPIRIT programme . For the purpose of transparency and in accordance with Article 13 of the General Data Protection Regulation (GDPR), we therefore want to inform you about the data processing as follows:

Definitions

- **"GDPR"** shall mean the Regulation (EU) 2016/679 of the European Parliament and the Council of 27th 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.
- **"EU Data Protection Law"** shall mean all laws and regulations, including laws and regulations of the European Union (e.g. GDPR), the European Economic Area and their member states, applicable to the processing of personal data (as defined therein).
- **"Personal data"** shall mean any information relating to an identified or identifiable natural person as defined in article 4 para 1 GDPR; 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, gender, age or mental, economic, cultural or social identity of that natural person.
- **"Controller"** shall mean the natural or legal person, public authority, agency or another body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- **"Processor"** shall mean a natural or legal person, public authority, agency or another body, which processes personal data on behalf of the Controller.
- **"Processing"** shall mean any operation or set of operations performed upon personal data or 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.
- **"Consent"** - shall mean any freely given, specific, informed **and unambiguous** indication of his or her wishes by which the data subject, **either by a statement or by a clear affirmative action**, signifies agreement to personal data relating to them being processed.

General Information

Controller:

The **controller** of the data processing is **Borealis Polymers Oy**,
PL 330, 06101 Porvoo, Finland.

Hereinafter “Borealis”, “we”, or “us”.

For any request and further information regarding the processing of your personal data, please contact gdprquestions@borealisgroup.com.

Lawfulness of processing:

We may only process Personal Data if the processing is necessary:

- for the performance of a contract (e.g. to provide: products and services; carry out business partner instructions; fulfil commitments; to execute a contract etc.);
- to comply with a legal obligation to which Borealis is subject;
- for the purposes of Borealis’ legitimate interests and
- in certain cases, with your prior, free and informed consent for one or more specific processing purposes.

Data processing

We may use Personal Data among others for the following specific purposes:

For the **purposes of management of the SPIRIT programme** project collaboration, we process in particular your following personal data you provided via the SPIRIT Programme Contact Form (<https://www.spiritprogramme.com/contact-and-join/>):

- First and last name
- Contact details (Organization, city, country, email address, if applicable)
- Areas of interest (Renewable feedstock Circular plastics, CO2 reduction, or Enablers for green transition)

The legal basis is consent in accordance with Art. 6 (1) (a) GDPR, or on the basis of performance of a contract in accordance Art. 6 (1)(b) GDPR for current SPIRIT programme partners.

For the **purpose of the SPIRIT programme** newsletters, seminars and event management we process in particular your following personal data you provide:

- First and last name
- Email address
- Company name
- Ecosystem project, if applicable
- City
- Country/Region
- Industry

The legal basis is consent in accordance with Art. 6 (1) (a) GDPR

We do not make decisions about Data Subjects based exclusively on automated processing that produce legal effects concerning them or similarly significantly affect them.

The recipients or categories of recipients

The Personal Data collected as part of this processing may be shared with Borealis Group entities and only for the purposes mentioned.

We may disclose your personal data to the following categories of recipients (but not necessarily all personal data to all recipients) and only for the purposes mentioned above:

- Government authorities in accordance with applicable law
- agencies in charge with organizing different business events
- business partners
- other service providers of the SPIRIT Programme

We may also pass on your personal data to third parties if we are required to do so on the basis of legal requirements or decisions of courts.

Retention of your personal data

Generally speaking, your personal data will be retained as long as necessary for the fulfilment of the above purposes.

The **period** for which your personal data will be processed and stored by us is determined by the following criteria:

- during the term of our business relationship
- after the business relation is terminated:
 - for an additional period of three years (Borealis may be in touch with you for follow-up on operations and legal matters)
 - for an additional period of seven years (Borealis may be in touch with you for sales and marketing communication related to our products and innovations)
- to fulfil statutory record retention requirements
- with regard to use for our action or defense in response to claims and/or disputes, for the period provided by law and for any additional period if needed.

Security

We implement adequate technical and organizational measures to ensure a level of security of your Personal Data that is appropriate to the risks.

We take appropriate measures to ensure that we report security incidents leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to Personal Data.

Transfer to a Third Country or International Organization

Your personal data will in principal only be processed within the European Economic Area (EEA). In the event that we would transfer your personal data to countries outside the EEA, Borealis will ensure that the same level of protection is achieved (e.g. by concluding an standard contractual clauses with the Processor located in a country outside the EEA).

Your Rights

Information and Access

You are entitled to obtain **information** by BOREALIS as to which personal data are being processed and to get **access** to that personal data upon your request. We will provide you with one copy of the Personal data undergoing processing free of charge, unless the disclosure may adversely affect the rights and freedoms of others.

To access your personal data please [submit Borealis' Access Request Form](#).

Rectification and Erasure

You are entitled to request **rectification** of inaccurate personal data or completion of incomplete personal data concerning you without undue delay.

- You are entitled to request **erasure** of personal data without undue delay, if
- Personal data are no longer necessary in relation to the purposes for which they were collected,
- You withdraw your consent in case processing is based only on consent
- Your personal data have been unlawfully processed
- Personal data have to be erased for compliance with a legal obligation applicable to BOREALIS

However, BOREALIS is not obliged to execute such erasure if processing is necessary:

- for exercising the right of freedom of expression and information
- for compliance with a legal obligation to which BOREALIS is subject
- for the performance of a task carried out in the public interest or in the exercise of official authority
- for reasons of public interest in the area of public health
- for processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, or
- for the establishment, exercise or defense of legal claims

To request rectification/ completion or erasure of personal data concerning you please contact gdprquestions@borealisgroup.com.

Right to Object

Regarding the processing of your data for the purposes of promoting our products and services, you have a right to object. Upon receipt of your objection, we will stop processing your personal data for this purpose.

To object to the processing of your personal data [please submit Borealis' Request Form](#).

Restriction of Processing

You are entitled to request the **restriction of processing** of personal data in the following circumstances and for the following periods:

- you contest the accuracy of the personal data concerning you; restriction of processing may be effected for a period enabling the us verify the accuracy of the relevant personal data
- the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead
- we do no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims
- you have objected to processing, for the period until the verification whether our legitimate grounds override those of you

To request restriction of processing of your personal data [please submit Borealis' Request Form](#).

Data Portability

You are entitled to data **portability**, namely to receive your personal data which you have provided to BOREALIS and which is processed

- based on your consent or the concluded contract
- and by automated means

in a structured, commonly used and machine-readable format.

You are entitled to request that the personal data is transmitted directly to another controller by us, where technically feasible. This right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority.

To request data portability of your personal data [please submit Borealis' Request Form](#).

Complaint

You have the right to lodge a **complaint** with the **Finnish Data Protection Ombudsman**:

Office of the Data Protection Ombudsman

Visiting address: Lintulahdenkuja 4, 00530 Helsinki

Postal address: P.O. Box 800, 00531 Helsinki, Finland

E-mail: tietosuoja(at)om.fi