

Page 1

1. Data Controller

Husgrove

Gamla Morbyvägen 2 A 2

FI-02770 ESBO

2. Contact for data protection matters support@husgrove.com

3. Name of the register

Customer and marketing register

4. Grounds and purpose of processing personal data

The purpose of processing personal data is to enable the smooth and secure use of Husgrove's electronic services and online store, to process orders, and to investigate possible technical malfunctions.

Information provided by a customer when placing an order or making contact is used only for delivering the ordered product or service and for related communication.

Cookies used on Husgrove's websites are necessary for the functionality of the site and its e-commerce features (such as login, shopping cart, payment, and form submission).

Personal data is processed on the following legal bases:

- Consent (documented, voluntary, specific, informed, and unambiguous), for example for marketing communications or non-essential cookies.
- Contract, where processing is necessary for the performance or delivery of a product or service.
- Legitimate interest of the data controller, related to the maintenance, improvement, and security of services.

Information contained in contracts will not be disclosed to third parties without the written consent of the parties involved.

The primary purpose of processing personal data is to manage customer relationships, deliver products and services, and communicate marketing messages with the data subject's consent.

No personal data is used for automated decision-making or profiling.





5. Data content of the register

Husgrove's website and electronic services process only the information necessary for providing services, fulfilling orders, and ensuring data security.

The data processed may include, for example, the user's IP address, browser type, session identifiers, and essential cookies required for the basic functionality of the website and online store (such as login, shopping cart, payment, and form submissions).

Additionally, information provided by the customer, such as name, company, email, phone number, delivery and billing address, order details, and customer feedback, may be processed for order management and communication purposes.

Essential cookies are processed based on Husgrove's legitimate interest to ensure a safe and reliable service.

If non-essential or third-party cookies (such as those used for analytics or marketing) are used, consent is requested before they are placed.

6. Regular sources of data

Personal data is obtained primarily from the data subject when they place an order, send a message via form or email, make contact by phone, or interact through social media channels.

Information may also be obtained during customer meetings or other communication situations.

Husgrove may also use publicly available business contact information (such as company name, address, and general email address) for legitimate business purposes.

Technical data such as IP addresses and essential cookies are processed automatically to ensure the website's operation and data security.

7. Data disclosure and transfers outside the EU/EEA

Personal data is not regularly disclosed to third parties.

Data may be processed by Husgrove's trusted service providers that enable the technical operation of the website and online store (such as hosting, payment processing, IT maintenance, or license management).

These parties process personal data only on behalf of Husgrove and under agreements compliant with the General Data Protection Regulation (GDPR).

If data is transferred outside the European Union (EU) or the European Economic Area (EEA), such transfers will take place only to countries with an adequate level of data protection or under the European Commission's approved Standard Contractual Clauses (SCCs).



Page 3

8. Principles of data security and retention

Personal data is processed with special care and protected appropriately through technical and organizational measures.

When stored on servers, both physical and digital security are ensured through firewalls, encryption, backups, and access control.

Only employees whose work duties require access may handle personal data, and they are bound by confidentiality obligations.

Data is retained only as long as necessary to maintain customer relationships, ensure the functionality of services, or fulfill legal obligations.

9. Right of access and right to rectification

Data subjects have the right to access the personal data stored about them and to request the correction of any inaccurate or incomplete information.

Requests must be submitted in writing or electronically to the Data Controller at the address or email provided in sections $1\ \mathrm{and}\ 2$.

The Data Controller may, if necessary, request the requester to verify their identity and will respond within one month in accordance with the General Data Protection Regulation (GDPR).

10. Other rights related to the processing of personal data

Data subjects have the right to request the erasure of their personal data ("right to be forgotten"), as well as to restrict or object to the processing of personal data in certain situations.

Requests must be submitted in writing or electronically to the Data Controller at the address or email provided in sections 1 and 2.

The Data Controller may, if necessary, request the requester to verify their identity and will respond within one month in accordance with the GDPR.

Data subjects also have the right to lodge a complaint with the Office of the Data Protection Ombudsman if they believe their personal data has been processed in violation of applicable data protection laws.

Helsinki, 5th of November 2025