

PRIVACY POLICY FOR ENERVENT ZEHNDER OY WEBSITE

Applicable from 18 December 2015

Enervent Zehnder Oy (Business ID 2928724-4, "Enervent") collects, stores, and uses your personal data as a data controller in connection with and in order to provide, improve, and develop Enervent's consumer and non-professional as well as professional websites located at www.enervent.com including all of their affiliated sites, tools, and services (together and separately referred to as the "Website").

Enervent respects the privacy of visitors to the Website, and any information submitted by you or otherwise collected about you on the Website is processed in accordance with this privacy policy ("Privacy Policy"), the accompanying privacy statement, and applicable data protection laws.

By accessing and/or using the Website, you accept this Privacy Policy and give your consent to the processing, use, and disclosure of your data as stated herein, as well as to the possible use of cookies and other technologies as set forth herein. Please do not access or use the Website if you do not agree to this Privacy Policy. Please note that irrespective of your consent, Enervent may have a right to process your personal data by law.

This Privacy Policy does not apply to websites, resources, and/or services owned and operated by third parties. There might be links on the Website to such third party websites, but you understand that when you provide data to such third parties, you are providing it in accordance with their privacy policy (if any) and this Privacy Policy does not apply in relation to such data.

Enervent reserves the right to update and modify this Privacy Policy from time to time without prior notice. A notice will, however, be posted on the Website along with the amended Privacy Policy if any material changes are made hereto. Your continued use of the Website constitutes your acceptance of the amended terms and conditions of this Privacy Policy.

1. Collection and Use of Personal and Non-Personal Data

When accessing and/or using the Website, you may be asked to provide, or Enervent may automatically collect two kinds of data: (i) personal data that may be used to personally identify you, and (ii) non-personal data that typically does not personally identify you.

Both types of data may be collected at any time when you are in contact with Enervent, including but not limited to situations when you (i) access and use the Website; (ii) register for services available on the Website; or (iii) request technical or other support or advice from Enervent through the Website. If non-personal information is combined with personal data, the combined information shall be considered personal data. Enervent reserves the right to use and disclose any collected, non-personal data to third parties for advertising purposes.

Depending on your user profile (i.e., whether you are a consumer or other non-professional, a professional, or a professional with access to Special Content), the personal data collected and processed by Enervent may include, but is not limited to, your IP address, email address, name, address, telephone number, user name, password, and the name of your employer or company. Non-personal data may include, among other things, the type of browser you are using, the third-party website from which your visit originated, the operating system you are using, the domain name of your internet service provider, the search terms you use on the Website, the specific web pages you visit, and the duration of your visit.

Enervent may supplement your data with data received from third parties in connection with demographic, advertising, market, and other analytical reports or services.

Enervent may use your personal and non-personal information in accordance with the terms and conditions of this Privacy Policy in order to, among other objectives, provide, improve and further develop the Website, and provide service for your ventilation equipment. Personal data may also be processed for the purposes of customer relationship management, providing information regarding Enervent's and other third parties' products and services, advertising, and handling other matters related to the management of the Website and the services provided therein. Finally, where applicable, personal data may be processed to create user profiles to access Special Content, verify such users' identity, and to provide and maintain this special service.

2. Location Data

Enervent may collect and process IP-based location data derived from the IP address in order to provide services and advertisements based on your location. Such data is processed and stored only for the duration required for the provision of the location-related services.

3. Cookies

The Website may use cookies and other technologies to, for example, administer and improve the Website and help Enervent understand user behavior. Apart from IP addresses, Enervent treats information collected by cookies and other technologies as non-personal information. If you do not want cookies to be used, you can configure your web browser to reject the cookies. However, this means that the Website may not operate as intended.

4. Advertising

Enervent reserves the right to use and disclose the collected data for the purposes of advertising by Enervent or its partners and contractors.

Enervent may use third-party advertising-serving technologies to collect demographic information and information logged from your hardware or device. Enervent or third parties operating the advertising-serving technology may use such information to ensure that relevant advertising is presented on the Website. Enervent may display behaviorally targeted advertising to you.

Enervent may also use third-party service providers to display advertisements on behalf of Enervent across the internet. These service providers may use cookies to collect information about your visits to the Website in order to display Enervent's advertisements to you while you are visiting other websites. Such collected information is non-personal. However, please note that your IP address may be collected.

5. Analytics

Enervent may use your information to perform its own analytics and to enable analytics provided by third parties. Such analytics are used, for example, to support business analysis and operations, to improve products and services, to personalize content, and to provide advertising, and for product development and business intelligence. Enervent may also use third parties to develop the Website and analyze its use.

6. Disclosure and Transfer of Personal Data

Personal data may be disclosed and transferred to third parties, including without limitation Enervent's service partners, located within the European Union for the purposes mentioned herein and in accordance with this Privacy Policy and applicable legislation. Enervent may use authorized third party service providers to process personal data on its behalf and shall not be held liable for the actions of such third parties except as required by law.

Enervent reserves the right to transfer personal data when required by mandatory laws or authorities. Enervent may provide aggregate statistics about its customers, traffic patterns, and other related Website information to third parties, but these statistics do not include personally identifiable data.

7. Access, Integrity and Retention

Enervent does not verify the correctness of personal data disclosed. You may, however, ensure that your personal data is complete, accurate, and up-to-date by contacting Enervent (please see Section 9 below for contact details). You also have a right to review your personal data held by Enervent. You may request the correction of any potential errors in the data registered as well as deletion of data stored by Enervent, provided Enervent is not required to retain such data by law or for legitimate business purposes. Enervent reserves the right to deny any requests that are frivolous or otherwise extremely impractical, jeopardize the privacy of others, or for which access is not otherwise required by law. All access, correction, and deletion requests should be sent in writing and duly signed to the address noted in Section 9 below. Furthermore, and for avoidance of doubt, your exclusive way to contact Enervent to request the correction or deletion of data stored is via the contact information contained in Section 9; you should not contact other officers, directors or personnel at Enervent who do not deal directly with such matters. If the contact information in Section 9 changes, Enervent will update its Website to serve as notice to you of such a change.

As regards information submitted by you, you may decline to provide any personal data requested in connection with the access, provision, use, and development of the Website. As the processing of your personal data may be necessary to provide the Website to you, declining to provide such data and/or revoking your consent may result in Enervent not being able to provide you with some

or all parts of the Website. Please note that when you access and use the Website Enervent may process your IP address.

Any data collected by Enervent will be retained for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or allowed by law. Following this retention period, Enervent shall delete all aforementioned data in its possession within a reasonable timeframe.

8. Protection of Personal Data

Enervent takes the security of your personal information seriously and maintains reasonable safeguards to ensure the security, integrity, and privacy of your personal data as well as any other information in Enervent's possession. Data stored in a physical format shall be kept in a locked facility and only made available to those of Enervent's employees who reasonably require access thereto. Data stored in electronic format shall likewise be stored on a password protected server and only be made available to those employees of Enervent and authorized third-party administrators of the Website who reasonably require access thereto in order to fulfill the purposes of this Privacy Policy.

9. Contact Details

If you have any questions or concerns regarding this Privacy Policy or Enervent's data processing activities, please contact Enervent at either of the following addresses:

Register holder

Enervent Zehnder Oy

Kipinätie 1

06150 PORVOO, FINLAND

Tel. +358 207 528 800

enervent@enervent.com

or

Contact Person

Marketing Manager, Sonja Häggman

Tel. + 358 400 230 742

Email: sonja.haggman@enervent.com.

This Privacy Policy is accompanied by the below privacy statement concerning the processing of personal data on this Website.

PRIVACY STATEMENT

Personal Data Act (523/1999)

Sections 10 and 24

Date of drafting 11 Dec 2015
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1 Controller	Name Enervent Zehnder Oy
	Address Kipinätie 1, 06150 Porvoo, Finland
	Other contact information Tel. +358 207 528 800
2 Contact person	Name Marketing Manager Sonja Häggman
	Address Kipinätie 1, 06150 Porvoo, Finland
	Other contact information Tel. + 358 400 230 742 Email: sonja.haggman@enervent.com
3 Name of the register	<p>Enervent Zehnder Oy website user register. The register is comprised of two sub-registers, which are formed based on their purpose of use:</p> <p>A) Sub-register of public website users, which covers all users of the consumer and professional websites including users with access to Special Content; and</p> <p>B) Sub-register of website users with access to Special Content. <i>Such users are consequently covered by both sub-registers.</i></p> <p>This privacy statement spans both sub-registers. Any differences between the sub-registers are indicated below in sections 4 and 5.</p>
4 Purpose for processing personal data	A) Sub-register of public website users
	<p>Personal data is processed in order to provide, improve, and develop Enervent Zehnder Oy's websites located at www.enervent.com and www.enervent.com/professionals/, including all of their sub-sites, tools, and services ("Website"). Personal data may also be processed for the purposes of customer relationship management, providing service for ventilation equipment, providing marketing information, and handling other matters related to the management of the Website and the services provided therein.</p> <p>B) Sub-register of website users with access to Special Content</p> <p>Personal data is processed to create user profiles for the Special Content section</p>

	requiring login information, to verify such users' identity, to provide service for ventilation equipment, and to provide and maintain this restricted section of the Website.
5 Content of the register	<p>A) Sub-register of public website users</p> <p>IP addresses and general contact and personal information, such as the user's name, address, email address, and telephone number. Information registered about each user depends on the user's activities on the Website, e.g., whether the user is merely browsing the Website or making use of the Help Center to request service.</p> <p>B) Sub-register of website users with access to Special Content</p> <p>General contact and personal information, such as the user's name, address, and email address, user name, and password. The name of a user's employer or company is also collected.</p>
6 Regular sources of information	Personal data is collected in connection with the use of the Website or directly from the data subjects or with their consent.
7 Regular data disclosures	<p>Enervent Zehnder Oy may disclose personal data to third parties, including without limitation service partners of Enervent Zehnder Oy.</p> <p>Third party service providers may be used to process personal data on behalf of Enervent Zehnder Oy.</p>
8 Transfers of data outside the EU/EEA	Personal data is not transferred outside the EU or the EEA.
9 Principles of register protection	<p>Manual data Manual data shall be kept in a locked space and is available only to authorized persons.</p> <p>Data in electronic format Data stored in an electronic format shall be stored on a password protected server and only be made available to those employees of the controller and authorized third party administrators of the Website who reasonably require access thereto.</p>
10 Right of access	Data subjects are allowed to access the personal data Enervent Zehnder Oy may process about them. Access requests should be sent in writing and duly signed to the address given in section 2 of this privacy statement.

11 Right to request correction	Data subjects may request the correction of any potential errors in the registered data. Correction requests should be sent in writing and duly signed to the address given in section 2 of this privacy statement.
11 Other rights concerning the processing of personal data	Data subjects may have their personal data deleted, provided that Enervent Zehnder Oy is not required to retain such data by law or for legitimate business purposes. Deletion requests should be sent in writing and duly signed to the address given in section 2 of this privacy statement. As regards data submitted by data subjects, data subjects may decline to provide any personal data requested in connection with the provision, use, and development of the Website. As the processing of personal data may be necessary to provide the Website and Content therein, revoking the consent may result in Enervent Zehnder Oy not being able to provide some or all parts of the Website to such users. Any data collected by Enervent Zehnder Oy will be retained for the period necessary to fulfill the purposes outlined in this privacy statement unless a longer retention period is required or allowed by law. Following this retention period, Enervent Zehnder Oy shall delete all aforementioned data in its possession within a reasonable timeframe.