

Ahopelto Capital Oy Privacy Policy

General

Ahopelto Capital Oy takes your privacy matters very seriously. This Privacy Policy ("Privacy Policy") details how Ahopelto Capital Oy receives, collects and uses personal information in connection with our website ahopeltocapital.com ("Website") and Ahopelto Capital Oy's services and products. Website and the Ahopelto Capital Oy services and products offered to you through Website and any part thereof are collectively referred to in these terms as the "Service".

BY VISITING THE WEBSITE AND/OR USING THE SERVICE, YOU ARE ACCEPTING THE POLICIES AND PRACTICES DESCRIBED IN THIS PRIVACY POLICY, AS MAY BE AMENDED FROM TIME TO TIME. EACH TIME YOU VISIT THE WEBSITE OR USE THE SERVICE, YOU AGREE AND EXPRESSLY CONSENT TO OUR COLLECTION, USE AND DISCLOSURE OF THE PERSONAL INFORMATION THAT YOU PROVIDE AS DESCRIBED IN PRIVACY POLICY. AHOPELTO CAPITAL OY RESERVES THE RIGHT TO MODIFY THIS PRIVACY POLICY. YOUR CONTINUED USE OF SERVICE WILL SIGNIFY YOUR ACCEPTANCE OF THE CHANGES TO THIS PRIVACY POLICY. PLEASE DO NOT USE THE SERVICE OR WEBSITE IF YOU DO NOT AGREE TO THIS PRIVACY POLICY.

Data Controller and Contact Information

Data Controller is Ahopelto Capital Oy (Business Identity Code: 1944809-1), Pasilankatu 2, 00240 HELSINKI, Finland.

For questions and information about Privacy Policy, please contact us by email: ida.pihlstrom@aii-corporation.com, +358 9 3158 9580 or alternatively by mail: Ahopelto Capital Oy, Privacy Policy, Pasilankatu 2, 00240 HELSINKI, Finland.

Name of the Register

Ahopelto Capital Oy's customer and user register.

Purpose of Processing Personal Information

The purpose of Ahopelto Capital Oy's processing of personal information is to:

- (i) provide the Service to the user;
- (ii) ensure an efficient and secure use of the Service;

- (iii) provide customized Service and other content recognizing user specific needs and interests;
- (iv) improve, develop and analyze our Service and other Ahopelto Capital Oy's business activities;
- (v) manage customer relations, as well as to provide good customer service; and
- (vi) conduct research and collect statistics;

The Personal Information may also be used for direct marketing purposes, market research and to fulfil the requirements based on legislation and authority regulations.

Ahopelto Capital Oy will store personal information only for as long as is necessary in order to fulfil the purposes set out in this section and/or in accordance with the applicable legislation.

Data Subjects

Ahopelto Capital Oy collects personal information on persons who use the Service or if the collection of personal information derives from a legal obligation. Most of the personal information is collected from the data subjects themselves when the user creates a user account and/or uses the Service. Updates to the personal information may also be received from authorities, organizations, companies offering updating services, public directories and other public sources of information.

When visiting the Website or using the Service, certain technical and other information (that may be personal information) may be automatically sent by your computer to Ahopelto Capital Oy (e.g. IP address, the type of your browser and the source of your visit). Ahopelto Capital Oy can also collect information about your website usage information by using cookies. Please see the Cookies section of this Privacy Policy for further information. Any or all of the activities with regard to Website usage information may be performed on our behalf by our service providers, including, for example, our analytics vendor(s) and our e-mail management partner(s).

In the event Ahopelto Capital Oy makes message boards and forums available to users (collectively, "Forums"), users will be solely responsible for the information and any other content you post on and through these Forums and should be aware that when you voluntarily disclose personal information (e.g. name, e-mail address, telephone number) on or through these Forums, such information is generally accessible to, and may be collected and used by, other users. This may result in unsolicited messages from third parties, and such messages are beyond our control. Ahopelto Capital Oy does not exercise control over any users or Website visitors, and in no way is Ahopelto Capital Oy responsible, nor does Ahopelto Capital Oy have any liability whatsoever, for any collection or use of information you may disclose through the Forums. This Privacy Policy does not cover such disclosure of information. You are encouraged to exercise

discretion when providing personal information about yourself in and through Forums. Please do not post any personal information on the Website that you expect to keep private.

Information Ahopelto Capital Oy Collects

Ahopelto Capital Oy may collect the following Information from you when you create a user account and/or use the Service. By voluntarily providing us with personal information, you are consenting to our use of it in accordance with this Privacy Policy.

- Personal Information (first name, last name, email address, telephone number, title, mailing- or visiting address)
- Company Information (email address, telephone number, mailing- or visiting address)

The information is collected when you contact us (online or offline) in connection with a request for information, to order a product or service, to provide you with support, we collect information necessary to fulfill your request, to grant you access to the product or service, to provide you with support and to be able to contact you.

Personal Data That You Provide:

- First name and last name
- Email address
- Telephone number
- Title
- Mailing- or visiting address

Usage and other Non-Identifiable Data:

When you use the Website and/or Service, Ahopelto Capital Oy receives and stores certain personally non-identifiable information, such as the total number of visitors to our Website, the number of visitors to each page of our Website, device and browser information as well as Service usage data. We cannot currently use this information to identify you. It is important to note that no personal information is available or used in this process.

Aggregated Personal Information and other Information:

In an ongoing effort to better understand and serve our users, Ahopelto Capital Oy conducts research on user demographics, interests and behaviour based on the personal information and other information provided to us. Ahopelto Capital Oy compiles and analyses this research on an aggregate basis, and may share this aggregate data with partners of Ahopelto Capital Oy. This aggregate information does not identify you personally. Ahopelto Capital Oy may also disclose aggregated user statistics in order to describe our services to current and prospective business partners, and to other third parties for other lawful purposes.

Ahopelto Capital Oy also collects information regarding the use of Service in order to better understand user behaviour and trends, detect potential outages and technical issues. All log analysis is done in an anonymous, aggregate, non-personally identifiable manner.

Regular Destinations of Disclosed Data and The Transfer of Personal Information to Countries Outside of The European Union or The European Economic Area

Ahopelto Capital Oy may disclose the personal information within the limits of the applicable legislation. Personal information may be disclosed to co-operation partners chosen by Ahopelto Capital Oy for their marketing purposes, unless the data subject prohibits such disclosure of his/her data. The recipients of such personal information are not allowed to disclose the personal information further.

The confidentiality of the personal information may be broken when required by law or statute, or by ruling of authority.

Due to the technical and practical requirements, some of the personal information may be processed by subcontractors located outside the European Union or European Economic Area or at the subcontractors' servers outside the European Union or European Economic Area. If any personal information is transferred outside the EU or EEA, Ahopelto Capital Oy will ensure that the country to which the personal information is transferred is approved as having a sufficient level of privacy protection by the European Commission, or by using standard contractual model clauses approved by the European Commission.

The Principles of Securing the Data Register

Ahopelto Capital Oy uses technical and organizational measures to protect personal information against unauthorized access, transfer, deletion or other handling that may compromise information security. Such methods include the use of firewalls, encryption technologies and safe server rooms, proper access control systems, the controlled provision of user rights and supervision of their use, providing instructions for data processors, and the thorough selection of competent subcontractors who comply with industry standards for information security management.

Only appointed personnel of Ahopelto Capital Oy and of companies operating by Ahopelto Capital Oy's assignment or on behalf of Ahopelto Capital Oy are entitled to use personal information. All persons processing the personal information have a personal right of use granted by Ahopelto Capital Oy.

Right of Access, Correction and Prohibition

You may at any time contact Ahopelto Capital Oy to check that the personal information related to you is accurate. Upon your request, Ahopelto Capital Oy will modify, remove or supplement any incorrect, unnecessary, incomplete or outdated personal information.

The request to must be made in writing to Ahopelto Capital Oy and it must be signed. The request for right of access can also be presented in person in the main office of Ahopelto Capital Oy at the address Pasilankatu 2, 00240 HELSINKI, Finland.

The user has the right to prohibit Ahopelto Capital Oy from processing his/her personal information for purposes of direct advertising, distance selling, other direct marketing and market research and opinion polls.

If you no longer wish to receive e-mail communication from Ahopelto Capital Oy, such as offers, updates and newsletters, you may opt-out of receiving such communications by following the instructions included in each newsletter or communication.

Cookies, Clear Gifs and Other Automatically Collected Data

If you have permitted your computer to accept cookies, Ahopelto Capital Oy may use cookies on the Website. Cookies are pieces of information that a website transfers to an individual's hard drive for record-keeping purposes. Cookies make web-surfing easier by saving preferences and browsing patterns while you are at the Website. Cookies may be used to analyze the Website usage, improve content, customize the Website's content and layout and for other customer service purposes. A cookie may enable us to relate your use of our Website to other information about you, including your Personal Information. All of these purposes serve to improve and personalize your experience on our Website. Most Web browsers can be set to inform you when a cookie has been sent to you and provide you with the opportunity to refuse that cookie. Additionally, if you have a Flash player installed on your computer, your Flash player can be set to reject or delete Flash cookies. However, refusing a cookie may, in some cases, preclude you from using, or negatively impact the display or function of, the Website or certain areas or features of the Website.

Ahopelto Capital Oy may use "clear GIFs" (aka "Web beacons" or "pixel tags") or similar technologies, in the Website and/or in our communications with you to enable us to evaluate Website usage information about visitors to the Website, target campaigns, upgrade visitor information, and know whether you have visited a Website or received a message. A clear GIF is typically a one-pixel, transparent image (although it can be a visible image as well), located on a web page or in an e-mail or other type of message, which is retrieved from a remote site on the Internet enabling the verification of an individual's viewing or receipt of a web page or message. A clear gif may enable us to relate your viewing or receipt of a web page or message to other

information about you, including your personal information.

Third-Party Sites and Privacy Practices

Website may contain links that will let you leave Website and access another website. Websites linked to or from Website are not under the control of Ahopelto Capital Oy and it is possible that these websites have a different privacy policy. This Privacy Policy applies solely to personal information that is acquired on the Website or through your use of the Service, and/or your relationship with Ahopelto Capital Oy. Ahopelto Capital Oy urges you to be careful when you enter any personal information online. Ahopelto Capital Oy accepts no responsibility or liability for these other websites.

Analytics Collection

Ahopelto Capital Oy may use website analytics, such as Adobe Analytics and Google Analytics to gather anonymous statistics about the users of the Website with the aim to improve the Website. If Ahopelto Capital Oy uses such analytics, it will provide the user an opt-out function to indicate that you do not want Ahopelto Capital Oy to track your visits to Website.

Children's Privacy

The Website and Service are not intended for or designed to attract anyone under the age of 13 and we do not intentionally or knowingly collect personal information on our sites from anyone under the age of 13 (or older in some jurisdictions). We encourage parents to be involved in the online activities of their children to ensure that no information is collected from a child without parental permission.

Changes to Policy

From time to time, Ahopelto Capital Oy may revise this Privacy Policy. Ahopelto Capital Oy reserves the right to update or modify this Privacy Policy, or any other of our policies or practices, at any time with or without notice. However, we will not use your personal information in a way that is materially different than the uses described in this Privacy Policy without giving you an opportunity to opt-out of such differing uses.

Ahopelto Capital Oy will post the revised Privacy Policy on the Website, so that users can always be aware of what information we collect, how the information is used and under what circumstances such information may be disclosed. You agree to review the Privacy Policy periodically so that you are aware of any modifications. Your continued use of the Website and/or Service indicates your assent to any changes and signifies your agreement to the terms

of our Privacy Policy. If you do not agree with these terms, you should not use the Website or the Service.

Governing Law

This Privacy Policy shall be governed by and interpreted in accordance with the laws of Finland, excluding its conflicts of law rules, and shall be subject to the exclusive jurisdiction of the courts of Finland.