

## Privacy statement for the Posti Remote Home Storage service trial period

22.8.2025

This privacy statement describes how we process the data of natural persons in the Posti Remote Home Storage trial.

Posti 3 PL Contract Logistics Oy and Posti Ltd are joint controllers responsible for the processing of personal data in the Posti Remote Home Storage service (together referred to as "Posti"):

Posti 3 PL Contract Logistics Oy (Business ID: 3121167-9)

Posti Ltd (Business ID 2344200-4)

Address: Postintaival 7 A, 00230 Helsinki Email address: <u>kodinetavarasto@posti.com</u> Data Protection Officer: <u>tietosuoja@posti.com</u>

The responsibilities of the joint controllers are divided on the basis of which company provides the service. The service provider is specified in the product terms, in connection with the service, or on Posti's website. The customer may contact either of the controllers in order to exercise their rights under data protection legislation.

#### Purpose of processing, legal basis, and retention times

The trial for the Posti Remote Home Storage service processes data of natural persons who have expressed their interest in participating in the trial and, afterwards, of persons selected by Posti to participate in the target group for the trial period of the new service. Persons selected by Posti have the opportunity to make a contract for the Posti Remote Home Storage service. The trial period of the service is expected to last from September 15, 2025, to March 16, 2026.

Purpose of processing	Legal basis
Selecting the persons to participate in the trial period  Registering for the trial period and ensuring the suitability of the registered persons (e.g. place of residence and warehousing needs) and limiting the number of customers according to the resources of the trial period. Communication during the selection process.	<b>Contract:</b> Taking steps prior to and for the performance of a contract between Posti and the customer.
Provision, maintenance, and development of the service	<b>Legal obligation:</b> Bookkeeping and document retention.
Creating and maintaining a user account in the	<b>Contract:</b> Delivery and invoicing of the service.
mobile application and logging in to the service.	Legitimate interest: Development of the
	service and customer experience. Reporting.



Provision of transport and warehousing services and operational needs, such as service delivery processes, invoicing, and reporting.

Ensuring the legal protection of the customer and Posti. Posti's right to defend or pursue legal claims.

Development of the service.

Ensuring the legal protection of the customer and Posti, and fulfilling legal and regulatory obligations.

#### **Customer relationship management**

Managing the customer relationship (e.g. maintaining customer information) and carrying out communications.

**Contract:** Measures related to maintaining the customer relationship, such as keeping records and communicating with the customer.

**Legal obligation:** Mandatory communications (e.g. data breach notifications).

**Legitimate interest:** Other customer communications.

**Consent:** Notifications within the application (push notifications).

# Service security and quality, and system maintenance and development

Quality assurance and security of services, as well as system maintenance and development.

Ensuring service security and detecting, preventing, and investigating technical failures, errors, and misuse.

**Legal obligation:** Legal requirements related to safe use of the service.

**Legitimate interest:** Ensuring the security and quality of the service. Technical maintenance and development of the service. Ensuring the legal protection of the customer and Posti.

## Analysis, statistics and customer surveys

Analyzing, compiling statistics, and reporting for planning, executing, and developing Posti's business.

**Legitimate interest:** Planning, executing, and developing services and business operations, as well as strategic planning.

**Consent:** Information collected through nonessential cookies or other online identifiers.

Posti only retains personal data that is necessary for Posti's operations and processing purposes and for which there is a lawful basis. The retention period is determined on the basis of the purpose of the processing and/or the nature of the data. Retention may also be influenced by legal requirements for storing data and other time limits (e.g. statutory limitation periods) for taking legal or other actions. If processing is based on consent, such personal data will be deleted once the customer withdraws their consent.

As a rule, the customer's personal data is retained for the trial period and for a maximum of one year thereafter. Payment-related data required by the Accounting Act is retained for up to 7 years. If Posti and the customer agree that the service will continue after the trial period, the processing of the customer's personal data will continue in accordance with the privacy statement concerning the service.



Posti may also retain personal data deemed necessary for the establishment, exercise, or defense of legal claims until the matter has been resolved. In addition, Posti may be obligated to retain some personal data for longer than stated above in order to comply with the legislation or authoritative requirements. Data that is no longer necessary for its purpose, outdated, or otherwise lacking a legal basis for processing is anonymized or securely deleted.

### **Processed personal data**

Name, address, telephone number, email address, and information on warehousing needs will be collected from persons who have expressed interest in participating in the trial period.

For persons selected to participate in the trial period who use the mobile application and order the warehousing service, the following personal data is processed:

- First and last name
- Address
- Telephone number
- Email address
- Language
- Customer-specific identifiers (e.g. customer number)
- Username and password for using the mobile application
- Information related to the ordering and use of the service, such as contract type, price, agreed and actual shipments and warehousing, information on the validity of the insurance
- Deployment and end date of the service
- Information related to the payment of the service, such as the amount, bank details, account number, card identifiers and number, time of payment transaction
- Order history
- Login information for the service (e.g. timestamps) and other log data
- Information about the device and the operating system
- Information related to customer service and other customer relationship management
- Feedback collected from the customer (e.g. customer surveys)
- Additional address information related to the transport, such as the residential floor, access to an elevator, the door code, and free-form comments for the driver
- Packaging materials included in the delivery
- Unique identifier and status of the order/transport/warehousing (waiting for the item, sent, received)
- Delivery date and time and the customer's delivery confirmation
- Quantity, classification, dimensions, description, and warehousing place and time of the goods to be stored
- Photos of the item to be stored
- Information and photos of visible wear and damage to goods in the warehouse.

If the goods to be stored are transported from the customer to the warehouse and/or back to the customer through Posti's parcel services, the personal data in question will be processed in accordance with the <u>Privacy statement for Item Tracking</u>.

# Regular sources of information

The personal data originates from the customer when the customer fills out the registration form for participating in the trial period or starts using the service. Information on the use of the service is also generated as a result of Posti's actions.

Customers are responsible for keeping their contact information up to date with Posti to ensure proper functioning of the service and to allow Posti to reach them if necessary.



#### Recipients of personal data

Personal data is processed by Posti and its group companies for administrative purposes (e.g. customer relationship management, IT services). Posti uses service providers that process personal data on its behalf. These include:

- IT service providers delivering IT systems, server and maintenance services, and other technical support and services
- Communication service providers (e.g. email and SMS)
- Providers of analytics and statistical services
- Advertising, communication, and research service providers conducting customer surveys and communications
- Consulting service providers supporting service development and related operations.

Through the services, customers may also access or order products or services from third parties. In such cases, necessary personal data is shared with these third-party service providers, who act as independent data controllers, such as payment or additional service providers. The customer will be informed of this data sharing no later than in connection with such processing. Paying for the service in the mobile application requires the use of a payment service provided by a third party. The customer concludes a separate payment service agreement with a third party. In this case, the customer consents that Posti may disclose information needed for the conclusion and implementation of the contract to the third party in question. All information regarding the customer, invoice or payment necessary to realize the payment and authenticate the customer and payment can be disclosed to a third party taking part in the payment event and to a debt collection service provider.

Posti discloses personal data to authorities as required by law.

Personal data may be transferred outside the European Union or the European Economic Area in limited cases for service delivery, technical maintenance, and support, as permitted by law. Transfers require that:

- The European Commission has decided the recipient country or organization ensures an adequate level of data protection
- The recipient has signed an agreement with Posti containing the EU Commission's standard contractual clauses to ensure lawful processing: <a href="https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021D0914">https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021D0914</a>
- Another data transfer mechanism permitted under data protection law applies, such as binding corporate rules approved by a supervisory authority.

#### Data subject rights

The data subject has the right to receive information about the processing of their personal data and to know whether their data is being processed. They also have the right to access their personal data, obtain a copy of it, and request the correction or completion of inaccurate or incomplete data. The data subject may request the deletion or transfer of data, or in certain cases, request restriction of processing or object to processing based on their specific personal situation. When processing is based on consent, it may be withdrawn at any time.

The customer can view and edit their data in the "Profile" section of the mobile application.

The customer can submit a data request regarding their personal data stored in connection with the service and/or exercise their other rights described above by sending a request by email to the address <a href="kodinetavarasto@posti.com">kodinetavarasto@posti.com</a>. We process your request without undue delay and will respond within one month of receiving the request. The customer is entitled to receive their personal data free of charge.



If the customer has any questions about the processing of their personal data or feels that we have not carried out the actions they requested, the customer can contact Posti's Data Protection Officer at: <a href="mailto:tietosuoja@posti.com">tietosuoja@posti.com</a>. The customer also has the right to lodge a complaint with a supervisory authority, particularly in the EU country where their permanent residence or workplace is located, or where the alleged violation of the General Data Protection Regulation has occurred (in Finland: the Data Protection Ombudsman). More information can be found on the Data Protection Ombudsman's website: tietosuoja.fi/en