

SATO PULSSI RESIDENTS' PANEL'S DESCRIPTION OF DATA SECURITY



SATO residents' panel Combined register summary and information document
Personal Data Act (523/99) 10 § and 24 §

1. REGISTER OWNER

SATO Oyj
Panuntie 4
PL 401
00601 Helsinki

2. ACTORS MANAGING MATTERS RELATED TO THE REGISTER

Marketing Clinic Finland Oy
Pursimiehenkatu 31 B 303
00150 Helsinki
Kati Nurminen
Puh: 040 540 3663

3. NAME OF THE REGISTER

SATO Asukaspaneeli / SATO residents' panel

4. PURPOSE OF PROCESSING PERSONAL INFORMATION

The register information is used for market research and opinion research
whose results will be used to support SATO Ltd.s business operations and partners.

5. INFORMATION CONTENT OF THE REGISTER

The register can contain the following information:

A. Basic information of the members of SATO residents' panel:

First name
Surname
Year of birth
Gender
Profession
Household
Year of moving into a SATO apartment
Segmentation information
Address
Postal code
e-mail
Mobile number

B. Research questionnaire information of a residents' panel's member:

User's responses to questionnaires
Other possible information collected with the permission of the user

6. REGULATORY SOURCES OF INFORMATION

Information related to SATO residents' panel is primarily collected from
the members personally during sign-up and via questionnaires.

7. REGULATORY INFORMATION TRANSFERS AND DISTRIBUTIONS

Information is not given to any external parties not participating in the analysis of residents'
panel's research. Members' information is not used for other marketing purposes.

8. PRINCIPLES OF SECURING THE REGISTER

The information security of processing personal information as well as the confidentiality, integrity and usability is ensured with appropriate technical and administrative measures according to Marketing Clinic's information security principles. Personal information is secured from unauthorised access as well as from unlawful or unintentional information processing. Personal information is processed only by those persons participating in analysing the research results.

9. RIGHT TO INSPECT PERSONAL INFORMATION AND EXECUTION OF THE RIGHT TO INSPECT

A member of SATO residents' panel has the possibility to check the information saved of him or her and alter it when responding to each research questionnaire, when invited to participate in research and via the panel's mobile interface.

According to Personal Data Act 26-28 §, members of the SATO residents' panel have the right to check what kind of information is saved of them on the SATO residents' panel. When requesting to check his or her personal information, a member of the SATO residents' panel is to provide the following information needed for finding the information: name, address, telephone number and e-mail address. A request for information inspection is done in writing and signed by hand. The request for information inspection is sent via post to: Marketing Clinic Finland oy / SATO Asukaspaneeli, Pursimiehenkatu 31 B 303, 00150 Helsinki A reply to the request for personal information inspection to the person requesting it will be sent in a registered letter. The letter will be sent only to the postal address which the member of the residents' panel has given in her request for information inspection.

10. REVISING INFORMATION AND EXECUTION OF THE INFORMATION REVISION

A member of the SATO residents' panel can update his or her personal information according to Personal Data Act 29 § (see article 9).

Register summary The register summary of SATO residents' panel outlines for which purposes and how personal information is used. Marketing Clinic Finland Oy follows the Personal Data Act and other Finnish laws when processing personal information.

11. UPDATES

SATO aims at constant development of the residents' panel, which is why withholds the right to change this description of data security. SATO recommends that a member checks this description from time to time for possible changes.

SATO PULSSI RESIDENTS' PANEL'S REGISTER SUMMARY



1. REGISTER OWNER

SATO Oyj
Panuntie 4
PL 401
00601 Helsinki

2. ACTORS MANAGING MATTERS RELATED TO THE REGISTER

Kati Nurminen
Marketing Clinic Finland Oy
Pursimiehenkatu 31 B 303
FI-00150 Helsinki
insight@marketingclinic.fi
P: 040 540 3663

3. NAME OF THE REGISTER

SATO Pulssi residents' panel

4. PURPOSE OF PROCESSING PERSONAL INFORMATION

The register information is used for market research and opinion research whose results will be used to support SATO Ltd.'s product and service development and marketing and sales development.

5. INFORMATION CONTENT OF THE REGISTER

The register can contain the following information:

A. Basic information of the members of SATO residents' panel:

First name
Surname
Year of birth
Gender
Profession
Household
Year of moving into a SATO apartment
Segmentation information
Address
Postal code
e-mail
Mobile number

B. Research questionnaire information of a SATO residents' panel's member:

The user's responses to questionnaires Other possible information collected with the permission of the user

6. REGULATORY SOURCES OF INFORMATION

Information related to SATO residents' panel is primarily collected from the members personally during sign-up and via questionnaires.

7. REGULATORY DISTRIBUTION OF INFORMATION

Information which personifies individuals is not transferred or distributed.

8. PRINCIPLES OF SECURING THE REGISTER

No manual data. The database is located on a secured server which no unauthorised persons can get access to.

SATO PULSSI RESIDENTS' PANEL RULES

1. GENERAL

SATO Pulssi residents' panel refers to a research community which is open to all habitual SATO residents over 18 years of age, who regularly use mobile devices and interested in influencing the development of their home building and its environment. By joining the SATO Pulssi residents' panel you confirm that you meet these requirements for joining and accept and will adhere to these rules as a member of the residents' panel.

2. RESEARCH INVITATIONS

All invitations are not necessarily sent to all members of the residents' panel – rather, invitations are sent to an applicable target group for each research when necessary. The target group of each research is sent an invitation and entry link to the research either via text message or e-mail.

3. CONFIDENTIALITY OF RESEARCH

All research is confidential and no respondent's name or contact details are directly linked to answers given by him or her. Responses are not examined individually. Responding is thereby confidential and anonymous per se. If these principles are diverged from in any way, the member of SATO Pulssi residents' panel will be asked for a permission to do so. The confidentiality of research is also applicable to the respondent: Unless otherwise noted, the residents' panel member is obliged to keep all matters and materials presented in a research survey fully confidential, and members are not allowed to copy, share, present, publish, send or transmit any such materials to a third party without SATO's written consent.

4. RESPONDING TO RESEARCH

Responding to research is always voluntary, and participation or membership do not require anything in return from the respondent. Members of the residents' panel are personally responsible for the charges of their internet connection as well as for any other device or programme charges unless otherwise agreed. Rewarding for responding is covered in article 5 of these rules.

Research is done for research purposes. Responding to research needs to be truthful, based on the respondent's personal experiences and perceptions. A member of SATO Pulssi residents' panel is responsible having the right to cede the information and other possible materials, such as pictures, given to SATO Pulssi residents' panel. SATO has the right to publish residents' panel's material anonymously in marketing and communications purposes.

5. REWARDING

Participating in the research is voluntary and out of the volition for participating and influencing matters concerning one's own living surroundings though one's own opinions. All respondents of SATO Pulssi residents' panel polls are entered in a lottery of 3 Present card gift cards worth 20 euros each. Gift cards are rewarded for more in-depth research and service development co-operations according to each project, which is agreed on separately before each project begins. Each member can earn a maximum of €100 worth of rewards per year due to taxation regulations. Residents' panel's member is obliged to inform SATO in case her total yearly reward accrual surpasses the limit for reasons not related to the SATO residents' panel. Once the maximum reward accrual is reached rewards are not granted. The lottery is carried out after the poll has closed. The answering time to polls may vary. Polls are closed once enough residents have taken part.

6. PERSONAL INFORMATION

Register summary and information (Personal Data Act 523/99 10 § and 24 §) about the register owner, the representative of the register owner, collected personal information and the purpose of their processing is available in the description of data security.

7. IMMATERIAL RIGHTS

All rights and ownership (including copyright and other immaterial rights) to the materials concerning the residents' panel or otherwise related to the materials published in the researches (including logos, trademarks, texts, photos and graphics) belong to SATO. No ownership or immaterial rights are transmitted to residents' panel's members, but the members have a limited right to use the materials received through the residents' panel only to participate in research organised by SATO and/or its partners. A user who violates these immaterial rights or uses materials for other than aforementioned purposes is responsible for any harm caused to SATO or its partners.

All rights and ownership (including immaterial rights and non-limited rights to change and hand over the immaterial rights further) to all comments, suggestions, ideas (including product, service and marketing ideas) and to other materials transmitted through the residents' panel or through other methods to SATO is transferred to SATO without remuneration and SATO is free to use them in ways seen best fit such as publishing, developing etc.

Member commits to withhold from transmitting material that is offensive, illegal, threatening, insulting, degrading, discriminatory, obscene, pornographic or blasphemous, that breaks confidentiality or privacy or that can be considered such or that may be criminal or illegal or encourage into such acts or material that contains spam or advertising content. Member is responsible for all the material she transmits and has full responsibility of all such material, including its legality and origin.

8. LIMITATIONS OF LIABILITY

All information and content given to SATO residents' panel are given to research purposes as they are. Participating in research is voluntary and gratuitous. SATO and its partners do not guarantee or take responsibility for the content of the information or their possible errors and/or deficiencies.

9. RESIGNATION

It is possible to resign from SATO residents' panel at any time by sending an e-mail to insight@marketingclinic.fi and informing about one's willingness to resign. Resigning does not require any explanation. A resigned member's personal information is deleted from the panel's active register. A member of SATO residents' panel who has not participated in research in the past 12 months can also be deleted from the panel's register. Personal information of the member will be deleted in this occasion. A person moving away from SATO apartment will be automatically removed from the residents' panel within 2 months from the move. SATO has the right to remove a member from the residents' panel anytime.

10. CHANGES

The register owner reserves all rights to changes in and/or terminating these rules, residents' panel and its research, and rewards and rewarding system. Members of the residents' panel are informed about any changes via e-mail and SATO website.