



PRIVACY POLICY

GENERAL INFORMATION

This privacy policy describes how Summa Defence Oyj (“company”, or “we”) processes personal data; what kinds of personal data the company collects, for which purposes the data is used and to which parties the data can be disclosed. This privacy policy applies to the processing of personal data of customers, potential customers, website users, potential employees, employee candidates, business partners and their representatives, event participants, recipients of marketing communications, and individuals interacting with us through social media or other digital channels.

Personal data refers to any information relating to a natural person (“data subject”) that can identify him/her directly or indirectly. Personal data, data subject, controller and other key terms are defined in the General Data Protection Regulation (2016/679, “GDPR”). The company complies with the GDPR in all processing of personal data in conjunction with other applicable national data protection legislation (data protection legislation).

CONTROLLER

Controller: IntLog Oy
Address: Luvalahdentie 449 B, 27820 Säkylä
Email: intlog@intlog.fi

PURPOSES AND LEGAL BASIS FOR PROCESSING PERSONAL DATA

Personal data will be processed for the following purposes:

- Delivery of our products and services based on contract or its preparation.
- Invoicing (including debt collection), customer service, feedback and related communications based on contract or its preparation or company's legitimate interest.
- Management and administration of our relationship with our business partners based on company's legitimate interest.
- Provision of information and materials related to our products and services, for example by newsletters and direct marketing based on company's legitimate interest or consent.
- Identifying potential customers who are using our services for the purposes of targeting relevant marketing to such persons based on company's legitimate interest.
- Registrations for our events, trainings and webinars based on company's legitimate interest.
- Market and customer analysis and surveys based on company's legitimate interest.
- Business planning and product development based on company's legitimate interest.
- Monitoring the use of our website and to improve the site functionality and user experience and to present the content of our website in a manner ideal for the visitor's device based on consent.
- Providing marketing on our website using cookies based on consent.
- Enabling social media services such as videos and sharing buttons based on consent.
- Fulfilment of statutory obligations, such as obligations under tax and accounting legislation based on statutory obligation.
- Ensuring security of our products and services and preventing abuse based on statutory obligation or legitimate interest.

- Ensuring security of our IT environments and protection of data based on statutory obligation or company's legitimate interest.
- Establishing, exercising, or defending against legal claims based on statutory obligation, or our legitimate interest.

For processing activities that are based on a legitimate interest, we have carefully balanced such legitimate interest with the data subjects right to privacy and concluded that our interest outweighs the data subjects' rights and freedoms.

AUTOMATED DECISION MAKING AND PROFILING

Profiling refers to the automatic processing of personal data in which some of your personal characteristics are evaluated using personal data.

The company does not make automated decisions.

WHAT PERSONAL DATA IS COLLECTED AND RETENTION OF PERSONAL DATA

The company collects only such personal data from the data subject that is relevant and necessary for the purposes described in this privacy policy. Personal data collected in connection with our services shall be retained as long as need for the purposes defined in this privacy policy and as required by the law, unless such data is replaced through regular updates or otherwise.

The following personal data from the data subjects will be processed:

Category	Examples	GDPR Legal Basis	Retention Period
Identification and Contact Data	Name, email address, phone number, employer name and address, job title/position	Art. 6(1)(b) – Performance of a contract; Art. 6(1)(f) – Legitimate interests (business relationship management)	For the duration of the business relationship and up to 3 years after its end, unless longer required by law. For the duration of the recruitment process and up to 3 years thereafter.
Marketing Preferences and Consents	Direct marketing consents, objections, communication preferences	Art. 6(1)(a) – Consent; Art. 6(1)(f) – Legitimate interests (marketing)	Until consent is withdrawn or objection is recorded
Business Relationship Data	Billing details, order history, feedback, correspondence, message history	Art. 6(1)(b) – Performance of a contract; Art. 6(1)(f) – Legitimate interests	For the duration of the business relationship and statutory limitation periods (typically 3–10 years)
Service Usage Data	Information on use of services/products, profiling data	Art. 6(1)(f) – Legitimate interests (service improvement, analytics)	Up to 24 months from collection, unless aggregated/anonymised
Electronic Identification and Technical Data	IP address, log data, device identifiers,	Art. 6(1)(f) – Legitimate interests (IT security, fraud	Log data typically 12 months; cookies per cookie policy

	cookies, usage information	prevention); Art. 6(1)(a) – Consent (for non-essential cookies)	
Compliance and Risk Management Data	AML/KYC documentation, sanctions screening results	Art. 6(1)(c) – Legal obligation	As required by law (typically 5–10 years)
Event Participation Data	Registrations for webinars, training, or events	Art. 6(1)(b) – Performance of a contract; Art. 6(1)(f) – Legitimate interests	For the duration of the event and up to 12 months after

DATA SOURCES

The personal data is mainly collected directly from the data subjects themselves, for example, in connection with preparing or signing of a contract or during a customer relationship.

The personal data may also be collected automatically when the data subject uses our various products and services.

In addition, and with the permission of the data subject, data may be collected in other ways in a marketing context.

Personal data may be updated and supplemented by collecting data from private and public sources.

WHO HAS ACCESS TO THE PERSONAL DATA?

For the purposes stated in this privacy policy, personal data may be disclosed, when necessary, to authorities, to other companies within our group, and to other third parties, such as third-party service providers (such as our IT vendors and marketing agencies conducting marketing on our behalf etc.). In such case, the personal data will only be disclosed for purposes defined above.

List of the processors and other recipients can be provided upon a request.

In addition, the company may share the personal data in connection with any merger, sale of our assets, or a financing or acquisition of all or a portion of our business and in connection with other similar arrangements.

The personal data is also disclosed to third parties if required under any applicable law or regulation or order by competent authorities, and to investigate possible infringing use of the products and services as well as to guarantee the safety of the products and services.

IS DATA TRANSFERRED OUTSIDE THE EUROPEAN UNION OR THE EUROPEAN ECONOMIC AREA

The servers and data related to our services are mainly hosted within the European Union (EU). In case personal data is exceptionally transferred outside EU/EEA, such transfers are either made to a country that is deemed to provide a sufficient level of privacy protection by the European Commission or transfers are carried out by using appropriate safeguards such as standard data protection clauses adopted or otherwise approved by the EU Commission or competent data protection authority in accordance with the GDPR.

HOW IS THE DATA PROTECTED?

Securing the integrity and confidentiality of personal data is important to us. We have taken adequate technical and organizational measures in order to keep personal data safe and to secure it against unauthorized access, loss, misuse or alteration by third parties. Nevertheless, considering the cyber threats in modern day online environment, we cannot give full guarantee that our security measures will prevent illegally and maliciously operating third parties from obtaining access to personal data or absolute security of the personal data during its transmission or storage on our systems.

RIGHTS OF DATA SUBJECTS

The data subject has a number of rights under applicable data protection laws.

RIGHT OF ACCESS AND RIGHT OF INSPECTION

The data subject has the right to obtain confirmation as to whether or not personal data concerning him or her is being processed.

The data subject has the right to inspect and view data concerning him or her and, upon a request, the right to obtain the data in a written or electric form. This applies to information that the data subject has provided to the company insofar the processing is based on a contract/consent.

Exercising this right is generally free of charge.

RIGHT TO RECTIFICATION AND RIGHT TO ERASURE

The data subject has the right to require us to delete or stop processing the data subject's personal data, for example where the data is no longer necessary for the purposes of processing. However, please note that certain personal data is strictly necessary in order to achieve the purposes defined in this privacy policy and may also be required to be retained by applicable laws.

RIGHT TO DATA PORTABILITY

The data subject has the right to receive the personal data that he or she has provided to us in a structured, commonly used and machine-readable format and, if desired, transmit that data to another controller. This right applies when the processing of the personal data is based on consent or a contract.

RIGHT TO RESTRICTION OF PROCESSING

The data subject has the right, under conditions defined by data protection legislation, to request the restriction of processing of his/ her personal data. In situations where personal data suspected to be incorrect cannot be corrected or removed, or if the removal request is unclear, the company will limit the access to such data.

RIGHT TO OBJECT TO PROCESSING

The data subject has the right to object to the processing of data where we are relying on its legitimate interests as the legal ground for processing. For example, the data subject may object to his/her personal data being used for marketing purposes.

RIGHT TO WITHDRAW CONSENT

In cases where the processing is based on the data subjects' consent, he/she has the right to withdraw his/her consent to such processing at any time.

EXERCISING RIGHTS

Requests regarding the rights of data subjects shall be made in written or in electronic form, and the request shall be addressed to the controller mentioned on this privacy policy.

If the data subject's request cannot be met, the refusal shall be communicated to the data subject in writing. The company may refuse a request (for example erasure of data) due to a statutory obligation or a statutory right of the company, such as an obligation or a claim relating to our services.

The data subject may exercise the aforementioned rights by sending a written request to Summa Defence Oyj, Mäkeläkatu 87, 00610 Helsinki.

If you have any questions relating to our data protection policies or wish to exercise your rights, please do not hesitate to contact us.

RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

The data subject has the right to lodge a complaint with a competent data protection authority if the data subject considers that the processing of personal data relating to him or her infringes current legislation.

However, we request that the matter be dealt with the company in the first instance.

The relevant authority in Finland is the Data Protection Ombudsman (www.tietosuoja.fi).

CHANGES TO THE PRIVACY POLICY

Summa Defence Oyj may make changes to this privacy policy at any time by giving a notice on the website and/or by other applicable means. The data subjects are highly recommended to review the privacy policy on our website every now and then. If the data subject objects to any of the changes to this privacy policy, the data subject should cease using the services, where applicable, and he/she can request that we remove the personal data, unless applicable laws require us to retain such personal data. Unless stated otherwise, the then-current privacy policy applies to all personal data we process at the time.

This privacy policy has been published on 29.1.2026, version 1.0