

PRIVACY NOTICE FOR CUSTOMER, USER AND MARKETING REGISTER OF HAAHTELA-KEHITYS LTD

This Privacy Notice applies to Haahtela-kehitys Ltd's customer, user and marketing registers, which are maintained for marketing purposes and to offer software products and services to customers and potential customers. The controller is Haahtela-kehitys Ltd, which defines the purposes and means of the processing of personal data and whose customer, user or marketing register contains the personal data in question. The principles related to the processing of personal data mentioned in this Privacy Notice apply to Haahtela-kehitys Ltd, which offers its customers and potential customers software products and services (together "Services"), and this company is referred to in this Privacy Notice as "Haahtela-kehitys Ltd" or "we". The contact details are listed in section 1 below.

We can collect and process personal data that we receive from all processes of Haahtela-kehitys Ltd. This personal data mainly concerns the users of Haahtela-kehitys Ltd's website and software products and services. However, a separate Privacy Notice applies to the human resources register of Haahtela-kehitys Ltd. The purpose of this Privacy Notice is to inform data subjects about the processing of personal data we collect in connection with our Services and website. We collect personal data of our customers and potential customers, users of our Services and visitors to our website ("Data Subject" or "you") to provide our Services.

This Privacy Notice describes what personal data concerning the Data Subjects we collect, how we process them and how you can exercise your rights as a Data Subject (such as the right to access your data and the right to request rectification).

We may update this Privacy Notice if this is necessary due to changes in the way the data is processed or for some other reason. We will not make any significant changes to this Privacy Notice or restrict the rights of the Data Subjects under this Privacy Notice without notifying of any such changes.

Please note that this Privacy Notice is applicable for the processing of personal data by Haahtela-kehitys Ltd as a controller. Haahtela-kehitys Ltd may process certain personal data in connection with the provision of the Services on behalf of the customer as a processor of personal data, in which case the customer in question is considered a controller. In this case, such data processing is subject to the customer's privacy notice or other documentation that informs Data Subjects of the processing.

Privacy and information security are important to us. We process all personal data in a manner that ensures appropriate security of the personal data and compliance with applicable laws and regulations.

1. CONTACT INFORMATION

Contact details of the controller:

Haahtela-kehitys Ltd:
Business ID: 0864430-2
Address: Bulevardi 16 B, FI-00120 Helsinki, Finland
Telephone number: +358 201 101 200
E-mail: haahtela@haahtela.fi

Person responsible for the register:

Emilia Santasalo, tel. +358 201 101 201
E-mail: emilia.santasalo@haahtela.fi

2. DATA TO PROCESS

We collect two types of data on the Data Subject: (i) User Data from our Services; and (ii) Technical Data from our website and our Services. Although we typically do not use Technical Data to identify individuals, sometimes people can be identified either individually or when connected or joined to User Data. In these cases, the Technical Data

can also be considered personal data in the manner referred to in applicable legislation and we treat combined data as personal data.

We may process the data related to a Data Subject listed below:

User Data processed in our Services

- First and last name
- Organisation and title
- Email and other contact information provided by the Data Subject
- Username
- Billing and payment Information
- Communication between the Data Subject and Haahtela-kehitys Ltd
- Marketing prohibitions and marketing consents
- Information related to the use of the Services by the Data Subject, such as activations and updates to the Services
- Other personal data provided by the Data Subject

Technical Data handled on our website and in our Services

- Location Information (country information only)
- IP Address
- Browser-related information
- Device identifier of the Data Subject
- Activation numbers
- Other technical data related to the use of the Service of the Data Subject

3. WHERE DO WE GET THE PERSONAL DATA?

We receive personal data processed in accordance with this Privacy Notice mainly from the Data Subject themselves. We may also collect some personal data from public and private registers. In addition, we may receive personal data when we use cookies and other technologies to improve the functionality of our websites or services, or when we combine, complement and analyse other available data.

4. PURPOSE AND LEGAL BASIS FOR PROCESSING PERSONAL DATA

Haahtela-kehitys Ltd processes personal data for the following purposes:

- **To market and provide our Services**
We primarily process personal data to market and provide Services to our customers, potential customers and their representatives, and to conduct, maintain and develop our business. For example, we can use this information to provide key functions of the Services and to provide access to the Services.
- **To fulfil our contractual obligations and rights**
Personal data may be used to fulfil our contractual obligations towards Haahtela-kehitys Ltd's customer company, represented by the Data Subject. If the Data Subject contacts our customer service, we will use the information provided to answer questions and resolve any problems.
- **Communications between Haahtela-kehitys Ltd and the Data Subject**
We may process personal data to contact Data Subjects about our Services and to notify Data Subjects of any changes to our Services.
- **Developing the quality of services and analysing trends**
We may process personal data to improve the quality of our Services and websites and to better understand our customers' needs, for example by analysing different trends in the use of our Services and websites. As far as possible, we only use information that does not identify individuals for this purpose.
- **To fulfil the obligations arising from the law**
We may also process personal data if required by law.

We process personal data to meet our contractual obligations towards our customers. We also process personal data on the basis of our legitimate interest. Our legitimate interest is based on conducting, maintaining and

developing our business, establishing and maintaining customer and collaborative relationships, and defending ourselves against legal requirements. When we process your personal data on the basis of our legitimate interest, we compare our legitimate interests with your right to privacy. Sometimes, we may ask you for your consent to process your personal data. In such cases, the Data Subject may withdraw their consent at any time. We also process personal data if it is necessary to comply with a legal obligation.

5. PERIOD FOR WHICH THE PERSONAL DATA ARE STORED

We only store personal data for as long as is necessary for the purposes of data processing. The storing period of the data depends on the nature of the data and the purpose of the processing, so the storing period may vary from case to case.

Most of the personal data in accordance with this Privacy Notice will be stored for as long as it is necessary to fulfil our statutory obligations or accounting obligations. Such information includes the Data Subject's name, contact details, and billing and payment information. Some personal data, such as the Data Subject's name, contact details, and billing and payment information, will be stored for as long as necessary to defend ourselves against any legal claims.

We store other personal data of the Data Subject that uses our Services as long as the Data Subject is a registered user or subscriber of our Services or as long as we have some other reason for storing the data, for example because of internal reporting. Personal data pertaining to the use of our Services will be destroyed within a reasonable period of time from the time when the Data Subject has stopped using all of our Services or when the Data Subject makes a request for the erasure of their personal data.

6. TRANSFER OF PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA

Personal data processed in accordance with this Privacy Notice is not transferred outside the European Union, but we store your data in the European Economic Area ("EEA").

However, we reserve the right to use service providers located outside the EEA in the future. In such situations, we undertake to take steps to ensure that the level of protection of your personal data is adequate in the jurisdictions in which your personal data is processed. We provide adequate protection for the transfer of personal data to non-EEA countries through agreements with our service providers based on standard contractual clauses adopted by the European Commission or other similar arrangements.

For more information on personal data transfers, please contact us using the contact information above.

7. CATEGORIES OF RECIPIENTS OF THE PERSONAL DATA

We share personal data within Haahtela Group's organisation only to the extent necessary for the delivery and development of our Services. We do not disclose your personal data to parties outside our organisation, except for the following situations:

- **Sharing is necessary due to the purposes of this Privacy Notice**
To the extent that it is necessary for third parties to have access to personal data for the performance of the Services, Haahtela has taken appropriate contractual and organisational measures to ensure that the processing of personal data takes place exclusively for the purpose of implementing the purposes mentioned in this Privacy Notice and in accordance with applicable laws and regulations.
- **For legal reasons**
We may disclose personal data to third parties outside our organisation if access to the personal data is reasonably necessary to (i) comply with any applicable law, regulation and/or court order; (ii) to detect, prevent and deal with fraud, money laundering, terrorist financing, information security or technical problems; and/or (iii) to protect the property of Haahtela-kehitys Ltd or our customers or users of our Services or to guarantee security of the purposes of general interest as laid down in the law. If possible, we will notify the Data Subjects of such transfer and processing.

- **For authorised service providers**
We may disclose personal data to authorised service providers that provide the Services such as our accounting firm or subcontractors that provide data retention, sales, marketing and customer support services. Our agreements with our service providers include commitments to limit the use of personal data and to comply at least with the privacy and information security standards set forth in this Privacy Notice. Please note that when you disclose your personal data directly to a third party, for example through a link on our website, the processing of personal data is usually based on the third party's own documentation and standards.
- **Other legitimate reasons**
If Haahtela-kehitys Ltd is a party to a merger, business acquisition or other trade sale, we can disclose personal data to a third party involved in the merger in question. However, we will ensure that all personal data is kept confidential. In this case, we will report the transfer as soon as reasonably possible to the Data Subjects whose personal data are affected.
- **With your express consent**
We may disclose personal data to third parties outside our organisation for reasons other than those mentioned above when we have the express consent of the Data Subject. The Data Subject has the right to withdraw such consent at any time.

8. RIGHTS OF THE DATA SUBJECT

- **Right of access to personal data**
You have the right to access the personal data we process concerning you. If you wish, you can contact us to determine which personal data we process and for what purpose this data is used.
- **Right to withdraw consent**
If the processing is based on your consent, you can withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of the processing of personal data that we processed prior to the withdrawal. Withdrawing consent may restrict your access to our Services.
- **Right to demand rectification of information**
You have the right to require us to correct or supplement any inaccurate or obsolete personal data we store. By contacting us, you can update your contact information or other personal information.
- **Right to demand the erasure of data**
You can ask us to remove your personal data from our systems. If we do not have a legitimate reason not to delete the information, we will take the appropriate action in accordance with your request.
- **Right to object**
You may object to the processing of your personal data if it is processed on the basis of our legitimate interest or for purposes other than those mentioned in this Privacy Notice. If we have no legitimate reason to continue processing your data, we will stop processing your personal data after you have opposed it.
- **Right to restrict the processing of data**
You can ask us to restrict the processing of your personal data, for example, when your requests for deletion, correction or objection are being processed and/or when we have no legitimate grounds to process your data. However, restricting data processing may limit your access to our Services.
- **Right to transfer data from one system to another**
You have the right to receive your personal data from us in a structured and commonly used format and independently transfer it to a third party.
- **Exercising rights**
If you wish to exercise any of the above rights, please send us the following information by post or email: Full name, address, telephone number and copy of a valid ID. We may request the provision of additional information necessary to prove your identity. We can reject requests that are unreasonably frequent, excessive or manifestly unfounded.

9. DIRECT MARKETING

Notwithstanding any prior consent regarding direct marketing, the Data Subject shall have the right to prohibit us from using their personal data for direct marketing, market research and profiling for direct marketing purposes by

contacting us in accordance with the contact details indicated above, or by using the Service functions or the possibility of cancelling an order offered in connection with direct marketing messages.

10. INFORMATION SECURITY

We use administrative, organisational, technical and physical safeguards to protect the personal data we collect and process. We use measures such as data encryption, passwords, firewalls, secure spaces, and systems with restricted access. Our security measures are designed to maintain an appropriate level of confidentiality, integrity, availability, recoverability and fault tolerance. We regularly test our systems and other hardware for vulnerabilities.

In the event of a breach that, despite information security measures, is likely to have adverse effects on the privacy of the Data Subjects, we will report the breach to the relevant Data Subjects and other affected parties as required by applicable legislation and, if applicable, to the authorities as soon as possible.

11. COOKIE POLICY

We can collect personal information by using cookies and other similar technologies. A cookie is a small text file that is sent to and stored on the computer of the Data Subject. Cookies do not harm users' computers or files. Cookies may be necessary for the proper functioning of our websites or Services. We use cookies on our website and in our Services primarily to enable the best user experience and functionality and to analyse and develop the use of our website and our Services. For more information about our cookie practices, please visit our website.

12. FILING A COMPLAINT

You have the right to file a complaint with the supervisory authority if you feel that the processing of personal data by Haahtela-kehitys Ltd violates data protection legislation.

Last updated: 21 October 2022