

Quuppa Privacy Notice

Valid from 25 May 2018.

Quuppa is committed to protecting your individual rights and keeping your personal data safe. In this Quuppa Privacy Notice we describe the collection, usage, storage and sharing of personal data. The data controller is Quuppa Oy (registration number 2495832-8).

1. What is the purpose of processing personal data?

Quuppa processes personal data on our clients, potential clients and interest groups related to us in order to provide, promote, and develop our positioning technology and services, and to maintain other business relationship with individuals close to us. Our connection with you can stem especially from your tasks or position in a company related to us.

Personal data is also processed for planning and carrying out our business operations, and, to the extent possible, for maintaining and further developing our business as well as creating added value in it.

2. What personal data we collect

Personal data is in most cases collected directly from you, your employee, or generated as part of the use of our services and products. Sometimes additional information is required to keep information up to date or to verify information we collect.

The personal data we collect can be grouped into the following categories:

- **Identification information:** first and last names
- **Company and contact information:** phone numbers, email addresses, job title, company name, company address and country, company telephone number
- **Information about marketing and communication methods:** event participation information, event invitations, newsletters

We collect information you provide directly to us. For example, when contacting us we collect personal data, such as name, job title, email address and phone number. Quuppa also collects information which you provide us with such as messages you have sent us, e.g. feedback or a message in our digital channels. Your actions, such as log ins, project submissions and orders, in our Customer Portal service are also logged. Information on event invitations, newsletters and other promotion communication sent to you, as well as event participation information is also collected.

In addition, we may use other sources to collect information related to your tasks or position in an organisation, such as business networks.

3. How we may use your personal data and the lawful basis for doing so

We use your personal data to comply with legal and contractual obligations as well as to provide you with offers, advice and services. The main purpose of our processing of personal data is to be able to give offers as well as documenting, administering and completing tasks for the performance of contracts with our B2B customers.

Examples of the performance of a contract:

- Processes needed to open user accounts to our customer's employees
- Customer service during the contract period
- Delivering products and invoices

4. Who we may disclose your personal data to

As a main rule, we do not disclose personal data to third parties without your consent. Despite this, we may be required to disclose data on you to third parties in individual situations. We may have, for example, the obligation to disclose personal data to authorities if such disclosure is mandatory under applicable laws.

We have entered into agreements with selected suppliers, which include processing of personal data on behalf of us. Examples thereof are suppliers of IT development, maintenance, hosting and support.

In some cases, we may also transfer personal data to organisations in so-called third countries (countries outside of the European Economic Area). Such transfers can be made if any of the following conditions apply;

- the EU Commission has decided that there is an adequate level of protection in the country in question, or
- other appropriate safeguards have been taken, for example the use of the standard contractual clauses (EU model-clauses) approved by the EU Commission or the data processor has valid Binding Corporate Rules (BCR) in place, or
- that there are exceptions in special situations, such as to fulfill a contract with you or your consent to the specific transfer.

5. How we protect your personal data

Quoppa abides by good data management practices, a high duty of care and strict data security measures to protect your personal data.

Quoppa and any service providers involved in the processing of personal data take appropriate technical and organisational measures to protect personal data against unauthorised access and accidental or unlawful destruction, alteration, disclosure, transfer or all other unlawful forms of processing.

The right of access to personal data is limited so that access rights are provided only to persons who require access in order to be able to perform their duties.

6. Your privacy rights

You as a data subject have rights in respect of personal data we hold on you.

You have the right to access the personal data on you and right to request the rectification of any erroneous or obsolete data.

In certain situations, you also have the right to have your personal data removed, or request that the data be transferred to another controller. However, please note that in the majority of situations, we need personal data on you in order to provide services to you or the company you represent.

Quuppa may send you electronic direct marketing related to your tasks, if you have not declined such messages. If you do not wish to receive such messages any longer, you can at any time cancel our electronic direct marketing to you by opting-out.

You have the right to request data protection authorities to review any issue relating to our processing or your personal data.

7. Cookies

We collect, process and analyse data regarding the use of our webpages. Traffic data is data connected to visitors on the web page and data handled in communication fields for sending, distributing or making messages available.

We use cookies and similar technologies to deliver products and services to you, provide a secure online environment, to manage our marketing and provide a better online experience, track our website performance and to make our website content more relevant to you. The data will not be used to identify individual visitors except the users of Quuppa Customer Portal and Quuppa Forum.

You can set or amend your web browser controls to accept or reject cookies. If you choose to reject cookies, you may still use our websites and some services, however your access to some functionality and areas of our website or services may be restricted substantially.

8. How long we process your personal data

We will keep your data for as long as they are needed for the purposes for which your data was collected and processed. As a general rule, contact persons' personal data is stored for the duration of the employment or service relationship with the client organisation as well as for a period of one year from the date of last contact.

The data is systematically and regularly updated and data type specific retention periods are re-evaluated in regular intervals. During the evaluation, all outdated, unused and obsolete data is deleted.

The data retention period can vary by data category and Quuppa may have a statutory obligation to retain certain data for a specific time period. Due to this, the exact time periods and procedures for data destruction vary by data category.

9. How changes to this Privacy Notice will be made

We are constantly working on improving and developing our services, products and websites, so we may change this Privacy Notice from time to time.

This Privacy Notice was last updated on 25 May 2018.

We may update the Privacy Notice due to changes in our data processing or applicable legislation. An updated Privacy Notice is available on our website.

10. Contacting us

If you have any questions or concerns regarding our privacy policy, you can always contact us by sending an email to info@quuppa.com or by sending a letter to Quuppa Oy, Keilaranta 1, 02150 Espoo, Finland.