

# Quuppa Privacy Policy

This Quuppa Privacy Policy (“Privacy Policy”) was updated on 16 February 2022 by Quuppa Oy (registration number 24958328, having its registered address at Keilaranta 1, 02150 Espoo, Finland) and its affiliates (collectively “Quuppa” or “we”).

This Privacy Policy explains how Quuppa collects, uses, processes or otherwise handles personal information relating to an identifiable individual (“Personal Data”). We receive Personal Data from you or others in connection with developing, selling and marketing our positioning technology products and services, our websites, our software applications or programs, Quuppa Cloud, Quuppa Portal and related websites and software applications (collectively “Services”). We collect and/or process Personal Data from our customers and potential customers, interest groups related to us in order to provide, promote and further develop our Services and in order to maintain business relationships with you and the companies represented by you.

In this Privacy Policy we describe how we collect, use, store, secure, process and share Personal Data.

## Collection of Personal Data

Types of Personal Data which we may collect:

- Information provided by you when using the Services: first and last name, phone number, email address, job title, company name, company address and country, company telephone number and other similar contact details
- Information about marketing and communication relevant to you and your organization: event participation information, event invitations, newsletters
- Information that you provide at meetings, events or other business occasions, or via messaging or social media applications when communicating with our employees or representatives, including name, address, email address, phone number, profile information, employer, title, and any other information that you may disclose.
- Information about your or your organization’s payment and invoicing status and history
- Information that you provide when applying for a job, including name, address, email address, phone number, employment history, educational background and other information that you may provide. We may use a third-party platform and partners for processing of the application.
- Information that is automatically collected through cookies and tracking technologies when you use the Services.

If you choose not to provide Personal Data when requested, you may not be able to access a particular Service. When you visit our websites, we and third parties may collect information about your online activities on our website and in relation to third-party websites or other online services for the purpose of targeted marketing. We collect this information for our business purposes and in order to improve and develop the Services for our customers as well as job applicants.

## Use of Personal Data

We process your Personal Data for the following reasons:

- to fulfill a contract for the Services or when you apply for a job with us;
- to comply with the applicable laws and regulations or requests from government or law enforcement authorities;
- to conduct our business and to provide Services you have requested or to investigate any complaints received from you;
- to help us monitor, customize, develop and secure Services;
- where you give us your consent we will send you direct marketing material, messages and information with regard to our relevant products and services, or other products and services provided by us or by our selected partners;
- on other occasions where we ask you for your consent, we will use your Personal Data for the specific purpose mentioned in the consent request.

## Disclosure of Personal Data

We may provide your Personal Data to third parties for the purpose of delivering our Services to you and for your interest in an employment at Quuppa. We may provide such Personal Data to our third-party service providers, sales representatives, authorized distributors, shipping companies and/or recruiters, as relevant. We will provide those third parties with your Personal Data which they need in order for them to perform the Services.

We may disclose your Personal Data to local and foreign public or governmental authorities to comply with legal, regulatory or administrative requirements, or in case of a breach of an agreement for legal defense, litigation, arbitration or as otherwise required by applicable laws and regulations.

Except for the circumstances described above, we will not provide any of your Personal Data to other companies or individuals without your consent.

## Use of Cookies

A cookie is a text file that a website transfers to the hard drive of your device for record-keeping purposes. Cookies are used to enhance the quality and functionality of the websites or related Services.

Our websites use these types of cookies:

- **Strictly Necessary Cookies:** Necessary cookies are absolutely essential for the website to function properly. This category only includes cookies that ensure basic functionalities and security features of the website. These cookies do not store any personal information.
- **Performance Cookies:** Performance cookies are used to understand and analyze the key performance indexes of the website which helps in delivering a better user experience for the visitors.
- **Functionality Cookies:** Functional cookies help to perform certain functionalities like sharing the content of the website on social media platforms, collect feedback, and other third-party features.
- **Analytics Cookies:** Analytical cookies are used to understand how visitors interact with the website. These cookies help provide information on metrics such as the number of visitors, bounce rate, traffic source, etc.
- **Advertisement Cookies:** Advertisement cookies are used to provide visitors with relevant ads and marketing campaigns. These cookies track visitors across websites and collect information to provide customized ads.
  
- **Other Cookies:** Other uncategorized cookies are those that are being analyzed and have not been classified into a category as yet.

Most web browsers automatically accept cookies but you can edit your browser options to block them in the future. Visitors to our websites who disable cookies will be able to browse certain areas of the websites but not all the features and functionalities of Services.

## Third-Party Sites

Our websites may contain links to other websites operated by third-party companies. We do not share your Personal Data with those websites (unless we have asked for your consent to do so) and are not responsible for their privacy practices. We encourage you to check the applicable privacy policy of the third-party to determine how they will handle any information they collect from you.

## Security of Personal Data

We and our service providers involved in the processing of your Personal Data take appropriate technical and organizational measures to protect your Personal Data against unauthorized access and accidental or unlawful destruction, alteration, disclosure, transfer or all other unlawful forms of processing.

We will only retain your Personal Data for the period necessary to deliver the purposes stated in this Privacy Policy, unless the extended retention is required or allowed by laws. Even when taking the appropriate measure, we cannot guarantee the security of your Personal Data transmitted over the public internet and wireless networks. We will, however, rely on currently available technologies in order to take appropriate security measures to protect your Personal Data.

In case of a security incident or security breach, we will, in accordance with the applicable laws and regulations, inform you of the security incident or breach, inform you about the measures that have been taken by us, recommendations for you regarding self-prevention and risk mitigation, and our remedial measures for you. We will inform you such information by email, push notification and/or we will issue a public notice.

## Your Rights

Subject to applicable law, you may be entitled to access, correct, update, erase, limit the use or transfer Personal Data we hold of you, or withdraw or change the scope of your consent. We will strive to grant these rights within a reasonable time. You may also withdraw your consent to receiving direct marketing communications. You may in certain circumstances ask us to cancel your customer account or delete your Personal Data to the extent permissible by applicable law, we will take reasonable steps to delete your Personal Data. Please note that we may not be able to continue providing Services to you if you entirely withdraw your consent or ask us to delete your Personal Data.

## EU Privacy Rights

If you are resident in the EU you are entitled to certain rights under the General Data Protection Regulation (“GDPR”). The lawful basis for processing your Personal Data is described above in the “Use of Personal Data” section.

We may transfer your Personal Data to the United States and other territories in order to operate and provide the Services. When we transfer Personal Data outside the European Economic Area, we rely upon appropriate safeguards such as standard contractual clauses or binding corporate rules. If you do not wish your Personal Data to be transferred to the United States or other territories outside of European Economic Area, you should not provide Personal Data to us.

As an EU resident:

- You have the right to withdraw your consent to processing, where consent is the basis we rely upon to process your Personal Data. For Personal Data we collected, you may withdraw your consent by requesting that we delete your Personal Data by contacting us using the details below.
- You have the right to receive information on the Personal Data that we hold and how we process it.
- You have the right to demand rectification of inaccurate Personal Data.
- You have the right to object to your Personal Data being processed under certain conditions.
- You have the right to erasure of your Personal Data under certain conditions.
- You have the right to demand that we restrict processing of your Personal Data, under certain conditions.
- You have the right to data portability of your Personal Data, subject to certain conditions.

- You have the right to complain to a data protection supervisory authority in the country in which you are resident.

## 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](mailto:info@quuppa.com) or by sending a letter to Quuppa Oy, Keilaranta 1, 02150 Espoo, Finland to the attention of the CLO or CEO.

## Changes

We are constantly working on improving and developing our Services so we may change this Privacy Policy from time to time. If we make changes to this Privacy Policy, we will post the updated policy on our website and other appropriate places.