

Etuma privacy policy

THIS POLICY

This privacy policy applies to products and services owned and operated by Etuma Oy (“Etuma”). Etuma is committed to protecting your privacy and complying with applicable data protection and privacy laws. This Privacy Policy (“Policy”) is designed to help you to understand what kind of information we collect and how we process and use such information.

This privacy policy covers how Etuma handles personal information, meaning information relating to an identified or identifiable individual (i.e. a natural person). This Policy applies to personal data collected in connection with the products and services offered by Etuma, Etuma.com website, Etuma.eu website and interactions related to our service or website such as customer support, customer events, or promotions and campaigns.

For the purposes of this policy, Etuma defines the term “client” as a business with which Etuma has an established relationship and “customer” as a customer of an Etuma client.

INFORMATION ETUMA COLLECTS

Etuma does not receive, use or collect personally identifiable information, such as names, addresses, phone numbers and e-mail addresses, except under the following circumstances:

Data collected from clients and prospects

We collect your personal data typically when you purchase our service, use or register into our services, enter into a sales promotion or a campaign, or otherwise interact with us. Below are examples of the categories of the data we collect on you.

Information you provide us. When you register to our services, make a purchase, enter a sales promotion or otherwise interact with us, we may ask you to provide us with certain information such as your name, email address, street address, as well as user names, passwords and other such credentials that are used to authenticate users and to validate their actions or that may be needed to provide you with the products and services you have requested or to communicate with you.

Product demo. When an existing or prospective client goes to www.etuma.com to request a demonstration of a Etuma service, he or she must provide personal contact details and organization-specific information. Etuma also collects some marketing contact information such as name and email address through third parties. This information is used for marketing purposes only.

Newsletter and other marketing materials requiring subscription. When you sign up for our regular newsletter, we shall send you newsletter(s) or communications regarding products which may be of interest to you. If you no longer wish to receive these communications you can follow the unsubscribe instructions contained in each of the email communications you receive.

Website. For the most part, you may visit our websites or use our products or services without having to identify yourself. However, certain technical information is normally collected as a standard part of your use of our services. Such information includes, for example, your IP-address, access times, the website you linked from, pages you visit, the links you use, the ad banners and other content you viewed, information about your devices and other such technical

information your browser provides us with or as may be otherwise collected in connection with certain products and services. Please also see the section “Use of Cookies and Web Beacons” below.

Our Site includes links to other Web sites whose privacy practices may differ from those of Etuma. If you submit personally identifiable information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any Web site you visit.

Social Media Features. Our Web site may include Social Media Features, such as the Facebook Like button. These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. Social Media Features are hosted by a third party. Your interactions with these Features are governed by the privacy policy of the company providing it.

Testimonials. We may display personal testimonials of satisfied customers on our site in addition to other endorsements. With your consent we may post your testimonial along with your name.

Blogs. Our Web site offers publicly accessible blogs with comment section. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them.

Data collected from customers

When Etuma receives data from its clients, it may intentionally receive customers’ personally identifiable information. These contact details are only used for the purposes specified in the contract. An anonymization service is also available if unintentional reception of personally identifiable information is expected or suspected.

THE PURPOSES OF PROCESSING

Etuma processes your personal data for the purposes described below. Please note that one or more purposes may apply simultaneously.

Data collected from clients and prospects

Provision of products and services. We may process and use your personal data to provide you the product or service you have requested, fulfill your other requests, process your order or as otherwise may be necessary to perform or enforce the contract between you, your employer organization and Etuma. We may also process and use your personal data to ensure the functionality and security of our products and services, to identify you, and to prevent and detect fraud and other misuses.

Development of products and services. We may process and use your personal data to develop our products and/or services. However, for the most part we only use aggregate and statistical information in the development of our products and services, and not data directly identifiable to you. We may also process and use your personal data to personalize our offerings and to provide you with service more relevant to you,

for example, to make recommendations and to display customized content and advertising.

Communicating with you and marketing. We may process and use your personal data to communicate with you, for example, to provide information relating to our products and/or services you are using or to contact you for customer satisfaction queries. We may process and use your personal data for marketing. Marketing purposes may include using your personal data for personalized marketing or research purposes in accordance with applicable laws, for example, to conduct market research and to communicate our products, services or promotions to you via our own or third parties' electronic or other services.

Profiling. We may process and use your personal data for profiling for such purposes as targeted direct marketing and improvement of our products or services. We may also create aggregate and statistical information based on your personal data. Profiling includes automated processing of your personal data for evaluating, analyzing or predicting your personal preferences or interests in order to, for example, send you marketing messages concerning products or services best suitable for you.

Data collected from customers

Etuma does not sell or rent personally identifiable information gathered on its website or in the course of client work to third parties. Etuma shares information with third parties, such as its clients, only as described in this policy or as described at the time information is collected.

DATA RETENTION

We will retain your information for as long as needed to provide services to our clients. After the contract with the client ends, we shall retain the data for maximum of three months. All backups will be deleted within 30 days from this. We will retain the information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

DATA SECURITY

Etuma implements appropriate technical and organizational security measures to prevent and minimize risks associated with providing and processing personal data. Such security measures include, where appropriate, the use of firewalls, secure server facilities, encryption, implementing proper access rights management systems and processes, careful selection of processors, sufficient training of personnel involved in the processing, and other necessary measures to provide appropriate protection for your personal data against unauthorized use or disclosure. Where appropriate, we may also take back-up copies and use other such means to prevent accidental damage or

destruction of your personal data. All traffic is encrypted using Secure Socket Layer technology (SSL) or other encrypted tunnels.

We restrict access to personal information only to authorized personnel, contractors and agents who need to know that information in order to operate, develop or improve our service. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

Etuma stores the personal data within EU, following the EU GDPR data protection principles. We take appropriate steps to ensure that the personal data we collect under this Privacy Policy is processed according to the provisions of this Privacy Policy and the requirements of applicable law no matter where the data is stored. These steps include a variety of legal mechanisms, such as the use of personal data processing agreements incorporating the EU Commission Model Clauses.

TRANSFERS OF PERSONAL DATA

We may disclose your personal data to third parties solely as stated below in this Policy, or as obligated by mandatory law.

International transfers. Our products and services are provided using resources and servers located inside European Union. If we need to transfer your data outside of EU, we take steps to ensure that adequate protection for your personal data is provided as required by applicable laws. For international transfers of your personal data, we generally rely on agreements that are based on the Standard Contractual Clauses (“SCCs”) of the European Commission.

Service Providers. From time to time, Etuma may contract with third parties to perform functions necessary for its research operations and, under the terms of those contracts, may transfer data to those third parties. Etuma requires any such third party to maintain confidentiality of such data. We use other third parties such as an email service provider to send out emails on our behalf. When you sign up for our services, we will share your personal information only as necessary for the third party to provide that service. We also use third parties to assist us in selling our services.

Other disclosures. We may disclose and otherwise process your personal data in accordance with applicable laws to defend Etuma’s legitimate interests, for example, in civil or criminal legal proceedings.

Mergers and Acquisitions. If we decide to sell, buy, merge or otherwise reorganize our business, this may involve us disclosing personal data to prospective or actual purchasers and their advisers, or receiving personal data from sellers and their advisers, for the purposes of such transactions.

USE OF COOKIES AND BEACONS

Etuma may use cookies (small text files placed on your device) primarily for login and session management, to identify returning users from the same computer and ensure the integrity of its research. As part of its basic uses of Internet technology to provide a dashboard for clients to view their data, Etuma also collects technical information such as: user IP address; the date and time and user HTTP request headers. Etuma also uses third-party analytical cookies for tracking web traffic and usage.

Etuma may use so called web beacons (or “pixel tags”) in connection with some websites. However, we do not use them to identify individual users personally. Web beacons are typically graphic images that are placed on a website and they are used to count visitors to a website and/or to access certain cookies. This information is used to improve our services. Web beacons do not typically collect any other information than what your browser provides us with as a standard part of any internet communication. If you turn off cookies, the web beacon will no longer be able to track your specific activity. The web beacon may, however, continue to collect information of visits from your IP-address, but such information will no longer be personally identifiable.

If you wish to disable cookies, or want to be notified before they are placed, you may do this in your browser settings. However, we may not be able to provide certain services or you may not be able to view certain parts of this site if you have disabled cookies.

Some of our business partners whose content is linked to or from our website may also use cookies or web beacons. However, we have no access to or control over these cookies.

YOUR RIGHTS

Clients and prospects

You may at any time object to your personal data being processed for direct marketing purposes, sending promotional materials, profiling, or for the performance of market research. Further, where your personal data is processed based on your consent, you have the right to withdraw your consent for such processing at any time.

In case you wish to make use of your rights mentioned above, you may, as appropriate and in accordance with applicable laws, exercise such rights by contacting us through the contact points referred in the marketing materials or below in this Policy. In some cases, especially if you wish us to delete or cease the processing of your personal data, this may also mean that we may not be able to continue to provide the services to you.

Customers

Etuma receives or collects information under the direction of its Clients, and has no direct relationship with their customers whose personal data it processes.

We may collect information for our clients, if you are a customer of one of our Clients and would no longer like to be contacted by one of our Clients that use our service, please contact the client that you interact with directly.

An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data should direct his query to the Etuma's Client (the data controller). If the Client requests Etuma to remove the data, we will respond to their request within a reasonable timeframe.

COMPLAINT TO THE SUPERVISORY AUTHORITY

In the event you consider our processing activities of your personal data to be inconsistent with the applicable data protection laws or that Etuma has not sufficiently ensured the realization of your rights, you may lodge a complaint with the local supervisory authority responsible for data protection matters.

NOTIFICATION OF CHANGES

If we decide to change our privacy policy, we will post these changes to the Etuma website. All changes will be posted to this privacy policy, the homepage, and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. The date of last revision will be shown on the website.

We reserve the right to modify this privacy policy at any time, so please review it frequently. If we make material changes to this policy, we will notify you here, by e-mail, or by means of a notice on our home page prior to the change becoming effective.

PRIVACY CONTACT

If you have any questions or comments about this privacy policy or the practices of this site, or unresolved privacy and data use concerns, please contact Etuma by e-mailing support@etuma.com.

The data controller responsible for the purposes of the applicable data protection laws is:

Etuma Oy
Konepajankuja 1
00510 Helsinki
Finland