

Accelerated Operations Service Privacy Policy

Rejlers Finland Oy

September 3, 2021



1 Purpose of the document

This Privacy Policy governs our use and processing of your Data (“Data”) in our Accelerated Operations Service (“Service”).

Should you have any questions concerning this Privacy Policy or our processing of Data, please contact us at legal@rejlers.fi.

Controller: Rejlers Finland Oy

Address: Graanintie 5, 50190 Mikkeli, Finland

2 Collected data

The following Data you provide to us:

- Username
- The user's email address

The following data is automatically provided to us, when user registers into the Service via Office 365:

- The user's phone number and/or
- email address

We use this Data to operate and manage the Service (including identifying authorized users, and managing licenses), and to further develop, enhance, and improve the Service. The data can be used to provide support and problem resolution Services.

In addition to Rejlers, the Data may be visible to your company's Service administrator, as well as to other members of a project.

3 Transfers and disclosures

We may transfer or disclose some of your Data to Rejlers group companies and our subcontractors who assist in creating the Service. In addition, if you are a member in a project within the Service, and you add or modify comments or material/information in that project, your actions and email address will be visible to the other members of the project.

In the even that Data needs to be transferred or disclosed to our subcontractors, we require, in our contracts with them, that they use the Data solely for the purpose of providing their agreed services. We require our subcontractors to process Data pertaining to you in a manner that is consistent with our statements herein.

4 International transfers

We do not transfer Data outside the European Economic Area.

When we transfer Data outside the European Economic Area, we secure such transfers of Data according to the requirements of the law. We do this by imposing appropriate technical

and contractual safeguards on relevant subcontractors and Rejlers group companies, for example by using standard data transfer clauses that are approved by the European Union – the fixed content of such clauses is available at <https://tietosuoja.fi/en/standard-clauses-adopted-by-the-commission>.

In some cases, we may also accept other mechanisms to justify transfer outside the EEA. Such other justifications include providing data to entities who have registered under the United States' Privacy Shield program or providing data to entities processing such data in countries with an adequate level of privacy legislation that safeguards the data subject's rights.

We only do global or cross-border Data transfers for a good reason and after assessing the resulting privacy risk.

5 Other uses and disclosures

There are circumstances not covered by this privacy policy where the use or disclosure of Data may be justified or permitted, or where we may be obligated by applicable laws to disclose information without acquiring your consent or independent of service provisioning.

One example includes complying with a court order or a warrant issued by the authorities in the relevant jurisdiction to compel the production of information.

Similarly, there may be other circumstances where there is a justifiable legitimate interest to disclose limited sets of information to a third party. Examples of such disclosures include cases where we need to protect ourselves against liability or to prevent fraudulent activity, where it is necessary to solve or contain an ongoing problem, or where we need to meet the legitimate information requirements of our insurers or governmental regulatory agencies. In any such action, we will act according to the applicable laws.

We may also need to transfer your Data as part of a corporate transaction, such as a sale, merger, spin-off, or other corporate reorganization of Rejlers, where the information is provided to the new controlling entity in the regular course of business. Rejlers group discloses and transfers data internally as required by our then current operational model. We do, however, limit the disclosures internally to only those group companies, units, teams, and individuals who have a need to know such information for the intended purposes of processing it.

We weigh each disclosure requirement carefully and take the possibility of such disclosure requests into account when deciding where and how we store your Data.

6 Third parties

Our Service may be provided in conjunction with our partners. This privacy document only applies to Data as long as that data is within Rejlers' realm of influence. Where your Data is processed by other entities for their independent purposes, such other party is responsible for processing your Data in a justified manner in accordance to their policies as well as for fulfilling your rights under data protection laws. For example, in the event that the user

credentials have been provided to you by a third party with admin rights, such third party is a separate controller of your Data. Similarly, if you register to the Service via Office 365, Microsoft is a separate controller of your data, and their privacy statement can be found at <https://privacy.microsoft.com/en-US/privacystatement>.

7 Legal grounds

In order for us to fulfil our contractual obligation of providing you the Service – create an account for you, enable you to operate the Service, and to notify you of any issues concerning the Service – we need Data from you. In addition, we have a legitimate interest to collect and process Data to ensure the security of our Service, the confidentiality of our customers' information in the Service, as well as our customer's project management.

8 Retention

The Data is retained only for as long as required for the above purposes. As the same person might be a member of various projects of different customers, deletion of a project or a business account does not necessarily mean the deletion of your Data. Your Data is however automatically deleted, if you have not used your account in any project in a year. You will be sent an automatic notification prior to such notification, in case you wish to keep your account active. Please note, that if you have added comments or material in to the Service, you're email address will be visible in such projects' activity log even after the deletion of your account due to the abovementioned legitimate grounds.

9 Security

We use appropriate technical and organisational measures designed to protect the Data that we collect and process of you.

We use physical, administrative, and technical security measures to reduce the risk of loss, misuse, or unauthorized access, disclosure, or modification of your Data. The measures we use are designed and continuously developed to provide a level of security appropriate to the risk of processing your personal information.

All Data is stored on secure servers operated by Rejlers or our partners with access limited to authorized personnel only.

10 Your rights

Information on your statutory rights and how to contact us.

You have the right to the data that we have on you. In particular, you have the following rights to the Data that we hold on you:

- **Access and rectification.** You have the right to ask us what Data we have on you and to get a copy of the data that we can identify pertaining to you in this context. Should

you find any errors (e.g. obsolete information) in such data, we urge you to contact us to resolve the issue. In cases, where the user credentials have been granted to you by a third-party admin, they may correct your information directly.

- **Objection.** You are entitled to object to certain processing of Data, including for example the processing of your Data when we base our processing of you on a legitimate interest. In such case you need to establish a legally valid rationale for your objection.
- **Right to be forgotten.** You also have the right to request us to cease storing your Data and erase it. In this case you need to establish a legally valid rationale for your request. In case of us having a legitimate reason for continuing to store the Data, we will inform you of such.
- **Portability.** You also have the right to ask for Data that you yourself have provided – pursuant to a contract. You may request the data in a structured, commonly used, and machine-readable format and further that the data is transmitted to another controller, where technically feasible.
- **Restriction.** If you establish that the data we have on you is incorrect or we have no legal right to use it, you may request that we cease any further processing of your Data, and merely keep it in store until the issue is resolved.

Note that there may be situations where our confidentiality obligations, our right of professional secrecy, and/or our obligations to provide our Service (e.g. to your employer) may prohibit us from disclosing or deleting your Data or otherwise prevent you from exercising your rights. Your above rights are also dependent on the legal grounds based on which we process your Data.

If you have any complaints about how we process your Data, or would like further information, please contact us at any time. If you feel that we are not enabling your statutory rights, you have the right to lodge a complaint with a supervisory authority. In most cases, this authority is the Finnish Data Protection Ombudsman (<https://tietosuoja.fi/en/home>).

11 Changes

To continue keeping this document up to date, we will make changes and additions to this from time to time also in the future.

We will publish the changed policy document on our website or at another interaction point where it has previously been made available. If the changes are significant, we may also notify you by other means. Any changes will apply starting from the date that we publish the revised policy document.