Privacy Policy of Innoduel Ltd

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Controller:

Haituva Innovations Oy ("Innoduel") Business Identity Code: 2569433-6

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We care for your privacy

Innoduel respects your privacy. Therefore, we comply with the applicable laws and do not process our customers' or their clients' personal data without a legal basis for processing.

We describe here how we store and process data of our Registrants consisting of Users, Prospects, Customers and Recipients of marketing material.

We try to use as plain language as possible. Please feel free to send us feedback and ask further questions in case you need more information.

Person registers

This privacy policy applies to multiple person registers. Each of those registers has their unique purpose and lawful basis of storing and processing data as described in this chapter. One person can belong to multiple registers according to her relationship with us.

Prospect register: We store and process data about our prospects (possible future customers). We collect the data from publicly available sources such as company websites, and commercial registers. The legal basis for storing and processing data is Legitimate interest (This means we need to process this information to generate sales). We store name, email, tittle, phone number, employer and some traces of network activity as described by our cookie policy. We store the information to secure cloudbased systems, which are either located in EU/ETA countries or are US Privacy shield certified. We only contact Prospects with personal emails or phone calls. We don't target prospects with mass emails.

User register: We store and process data about our users (People who have registered to Innoduel admin portal). We collect the data from forms filled in by the customer, and from publicly available sources such as company websites. The legal basis for storing and processing is contractual agreement (This means you need to approve our privacy agreement in order to start using Innoduel). We store name, email, tittle, phone number, employer and some traces of network activity as described by our cookie policy. In addition, we store usage data of Innoduel software including details of licenses. We store the information to secure cloud-based systems, which are either located in EU/ETA countries or are US Privacy shield certified. We only send Users information, which is important for efficiently using Innoduel. This might mean information about technical updates, tips and hints etc. Each email contains an unsubscribe link.

Marketing register: We store and process data about Recipients of marketing material (Recipients). We collect the data from forms filled in by the Recipients and from publicly available sources such as company websites. The legal basis for storing and processing is registrant's consent (This means the Recipients have willingly subscribed e.g. to our newsletter or blog). We store name, email, tittle, phone number, employer and some traces of network activity as described by our cookie policy. We store the information to secure cloud-based systems, which are either located in EU/ETA countries or are US Privacy shield certified. We target Recipients with good quality marketing related material. Each email contains an unsubscribe link.

Customer register: We store and process data about Customers or Partners (Customers). We collect the data from forms filled in by the Customer and from publicly available sources such as company websites. In addition, we receive the data from the employer of the customer. The legal basis for storing and processing is legitimate interest (This means we need to use the contact information to send information about our contract etc.). We store name, email, tittle, phone number, employer and some traces of network activity as described by our cookie policy. We store the information to secure cloud-based systems, which are either located in EU/ETA countries or are US Privacy shield certified. We target Customers with important notices concerning the customer relationship.

Data retention

The personal data will be retained only for as long as necessary to fulfill the purposes defined in this Privacy Policy. After that personal data will be removed except when required by law or rights or obligations by either party.

Data Security

Innoduel has carried out the technical and organizational measures necessary for securing personal data against unauthorized access, against accidental or unlawful destruction, manipulation, disclosure and transfer and against other unlawful processing. The manual data is stored in locked facilities. Access to automatically processed data is limited by user rights and passwords within the organization of Innoduel or limited number of partners committed to appropriate security measures and the personal data is secured by appropriate data security methods.

Cookies

Cookies are files which are received and transmitted by a User's device when the User is using Innoduel's services, e.g., visiting websites. Innoduel may use cookies and similar techniques to provide functionality of services, to improve their quality and to enhance the user experience. By using our services and consenting to the use of cookies in his/her internet browser settings a Registrant consents to the use of cookies by Innoduel. The Registrants may prohibit the use of cookies by changing the browser settings. This may, however, affect the user experience of the services.

Registrant rights and quality

Registrants have the right to prohibit Innoduel to process personal data for any purposes. Innoduel recommends the Registrants to notify Innoduel's contact person provided in this Privacy Policy of such possible prohibitions in writing. Registrants also have a right to data portability, i.e. right to receive your personal data in a structured, commonly used machine-readable format and transmit your personal data to another data controller.

A Registrant has the right to access the data on him/her and upon request, obtain a copy of the data. Such request shall include information that is necessary for retrieving the data and shall be made using a personally signed document which can be addressed to the contact person provided in this Privacy Policy.

If a Registrant thinks there is a problem with the way Innoduel is handling personal data, the Registrant has a right to file in a complaint to a data protection authority in the EU. In Finland the competent authority is the Data Protection Ombudsman. The Registrant may contact Finnish Data Protection Ombudsman through this <u>link</u>.

Innoduel aims at taking care of the quality of personal data processed by it. Innoduel rectifies, erases or supplements possibly erroneous, unnecessary, incomplete or obsolete personal data at its own initiative or at the request of the data subject concerned.

Changes to the Privacy Policy

Innoduel may amend this Privacy Policy and the related information. Innoduel recommends that the Registrant regularly access the Privacy Policy to obtain knowledge of any possible changes to it. We will always provide the date of the Privacy Policy to allow you to see changes.

Innoduel will inform Users of possible changes by using reasonable and available channels.

Surprise!

Did you actually read it all the way here? Awesome! We have spent quite a few hours figuring out how to make this very important part of our relationship transparent but, let's face it, most people will rather have sticks under their finger nails than study this document. As a reward, we would like to offer you 5% discount on your next Innoduel order no matter if you are a new customer or not. Just send us an email with tittle "Found it" to the address contact@innoduel.com.