

## 1. SPOTILLA APP OWNERSHIP

The Spotilla app is owned by Seclion Oy (FI25871195). Contact details of Seclion Oy can be found on the footer of this privacy policy sheet. Seclion Oy does not claim ownership to the data viewed, edited or provided by the users. The data is owned by the company in a contract with Seclion Oy ("data controller")

Each app-user is individually authorized by the data controllers the log in to the specific customer environments existing within Spotilla. Seclion oy acts only as a data processor.

The person downloading the Spotilla app or using the web-based portal is mandated by the data controller to access, view, edit, delete or otherwise use the data that the individual data controller has chosen to store in Spotilla service.

## 2. WHAT DATA IS COLLECTED

The Spotilla app only collects data that the users insert into the Spotilla-service and it collects the location of the user in specific NFC-Read events that the user makes, if the user has given permission for this. The user account consists of the user's name, e-mail and password information. The backend services of Spotilla gather log-information about different events within the service, such as login attempts etc, which are used purely for the operation of the service. These logs do not include any personal data.

The specific information that the data controllers decide to store into Spotilla service is the responsibility of the individual data controllers. Seclion Oy does not control, claim ownership or know what data the data controllers store into Spotilla service. Each data controller is responsible for the lawful basis that they have for using Spotilla to store data.

## 3. LEGAL BASIS FOR COLLECTING DATA

By using the application the user gives Seclion Oy right to act as the data processor of the information that the user provides to the service. The service works only by the user logging into the service and providing the data, the app does not collect any data passively.

The data controllers who have authorized the app user to use their specific instance of the Spotilla service are responsible for the data the user uses and creates within Spotilla. The data controllers control the different rights of users to see data and perform actions with it.

Seclion Oy is not responsible for the legal rights of the data controllers to use Spotilla in any specific data use cases.

## 4. FOR WHAT PURPOSES DATA IS COLLECTED

The data is collected per the use case of the data controllers. Seclion Oy only collects operational data needed for the running of the service and acts as a data processor. Each individual data controller is responsible for the data they collect.

## 5. THIRD PARTY ACCESS TO DATA

The data stored in Spotilla is accessible only by the data controller and whoever the data controller has agreed to work on its behalf in the upkeep of the data (such as Spotilla mobile app users, according to the individual user permissions the data controller has given them). Seclion Oy never gives access to any data controller data to external parties. Subcontractors of Seclion Oy participate in the development of the system, for which purposes they have an access to the hashed and crypted database, but they never have access to raw data. As a data processor Seclion Oy or it's subcontractors developing the system never give data to any third parties.

## 6. THIRD PARTY ACCESS TO DATA

The users of Spotilla can make requests to see, request or rectify the data in Spotilla directly to the data controller. Seclion Oy as the data processor does not provide information to users about their data.

## 7. INFORMING ABOUT CHANGES IN THE PRIVACY POLICY

If the privacy policy regarding Spotilla service changes, Seclion Oy informs all the data controllers about the issue and works in accordance with them to also notify the end users. The data controller is ultimately responsible for making sure, that the users it has mandated to use the data they store in Spotilla are aware of the data protection issues regarding the information these users can see, edit, add or delete.

**This privacy policy is valid from 1.2.2019 onwards**