

Rightware Data Protection Statement

Website, marketing and customer register

1. Name of the register

Website, marketing and customer register

2. Controller

Name: Rightware Oy
Address: Itämerenkatu 1 A, FI-00180 Helsinki, Finland

3. Contact person for the register

Name: Derek Sellin
Address: Itämerenkatu 1 A, FI-00180 Helsinki, Finland
Email: privacy@rightware.com

4. The purpose and legal grounds for the processing of personal data. Sources of personal information

Personal data will be collected and processed so that Rightware can serve its customers who acquire products and/or services from it.

Data will be processed to identify the users and to ensure that only authorized persons can access the service and only the parts of the services meant for them and that they can access only the information that is meant to be seen by them.

Data can also be used for customer service and to convey service bulletins and information to customers.

The collection and processing of personal data is always based on legislation, customer or service agreement, the legitimate interest of Rightware or the consent of the data subject.

For marketing part, we collect information when people subscribe to our newsletter, use our services or otherwise provide their information via our web site forms or similar functions. We store that information and we may contact the respective persons regarding our company and its services and products. We collect contact information from business persons from different sources to inform them on our products and services. We also collect information on our customers' employees to interact with them and to provide the services to them.

We use analytics services from Google. Through these services we gather information such as your usage data regarding your visit on our websites. This information is used to develop and market our products and services. You can disable the Google analytics services at <https://tools.google.com/dlpage/gaoptout/>. Please note that this opt out is specific for each browser and device.

We may also obtain information about your use of this website through “cookies” which enable us to make certain parts of the site easier to use. Cookies are small text files on your computer’s hard drive, allowing your computer to be recognized by our website. You may refuse to accept cookies and delete existing cookies using the settings on your Internet browser. If your Internet browser settings prevent the use of cookies, you may be unable to access or use fully certain parts of our website. When you enter our website, we may also collect information about your navigation, computer, IP address, operating system and browser type, for example, for statistical purposes or purposes of system administration. Once a user with cookies enabled has identified themselves (filled out a form), we use these cookies to track their individual behavior.

The collection and processing of personal data is always based on legislation, customer or service agreement, our legitimate interest or your consent. We are happy to clarify which ground is applied in each situation.

5. The content and sources of the register

For customers’ personnel may include:

- Full name
- User name
- Password
- E-mail address
- Phone number
- Messages sent in forms or via e-mail
- Information on the usage of our products

For marketing target persons and web site visitors may include (if provided by the target person):

- Full name
- User name
- Password
- E-mail address
- Phone number
- Company
- Role in a company
- Country
- Messages sent in forms and via e-mail
- Navigation information

6. Disclosures of information

Your personal information will not be disclosed or sold to third parties, and we store your data in locked facilities behind firewalls.

Information collected through analytics services can be stored outside the European Economic Area if the analytics services provider is located outside the EEA. Our sales companies, partners and companies belonging to the same group in different countries will have access to our marketing and sales data to the extent required and they may also be located outside the EEA Area. In all the aforesaid cases when we transfer data outside the EEA Area, we take steps to ensure that your

personal information is processed lawfully. Except for the above, we do not regularly transfer your data outside the European Economic Area.

We may also provide access to personal information to our subsidiaries or other companies belonging to our group of companies, including our parent company located in China.

7. Purposes and storage time

Before or at the time of collecting personal information, we will identify the purposes for which information is being collected. We will only retain personal information as long as necessary for the fulfilment of those purposes. Upon request, we provide more detailed information concerning data storage times.

8. Reasonable security safeguards are being used

We will protect personal information by reasonable security safeguards against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. We will use appropriate technical and organizational means to secure the personal data from inappropriate access, accidental or unlawful destruction, amendment, distribution and transfer of personal data as well as from other unlawful processing.

9. What are your rights?

You have the right to inspect what information related to you has been stored in our personal data files. You have a right to have incomplete, incorrect, unnecessary or outdated personal data deleted or updated according to the applicable laws. You have right to object to our data processing or to restrict that as well as to have your personal data transferred to another system.

You have a right to unsubscribe from direct marketing messages, withdraw any consent that you have made and to request that we stop processing your personal data for direct marketing purposes.

If you want to utilize your rights stated above please contact us via e-mail to our e-mail address privacy@rightware.com or use the contact addresses specified below.

In addition to the rights described above you are entitled to make a complaint to the data protection authority, especially in the European Union country where you have your domicile or permanent work place or where the claimed breach of data protection regulation occurred. In Finland, this authority is the data protection ombudsman.

10. Amendments to this data protection policy

Rightware may from time to time amend this data protection statement without prior notice to you.

In case you have any questions regarding the processing of your personal data, please contact us at privacy@rightware.com