

# **Privacy and Data Protection Policy**

On May 25, 2018, the new General Data Protection Regulation (GDPR) was implemented in the EU. The new regulation replaced the Personal Data Act and increased your ability to determine how companies and organizations handle data about you and the personal data created when using its services or products.

Read more about how Loopia Group manages your personal data and what rights you have with the implementation of GDPR via the links below.

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# Your personal data and how Loopia Group handles it

Your personal data is the data Loopia Group collects and processes about you and your usage of any services offered by the companies within Loopia Group that directly or indirectly identifies you. Loopia Group uses this information to provide a better user experience, improve services and provide offers that fit your needs.

The information below is a summary of how Loopia Group collects and handles your data in accordance with the General Data Protection Regulation (GDPR).

# Type of personal data Loopia Group collects

#### **Contact information**

When you become a customer of any company within Loopia Group, your contact information is collected by Loopia Group: *Name, address, email address, telephone number and national identification number*.

## Information about your services

Loopia Group also processes data about which services you order and use, and how you use them.

## How Loopia Group collects personal data

Loopia Group collects and processes data that...

- ...you enter yourself when you become a customer of any company within Loopia Group.
- ...you share with Loopia Group when you contact Loopia Group via email or phone.
- ...is created when you use Loopia Group's services for example, when you visit Loopia Group's website.
- ...Loopia Group gets from other sources such as Vainu.
- ...is collected through cookies that store information from your browser.

Exactly what information Loopia Group collects about you depends on which services you use from the companies within Loopia Group.

## What Loopia Group uses personal data for

In order for Loopia Group to process your data, one of the following legal bases must be met:

- Necessary to fulfill a legal obligation for Loopia Group.
- The processing lies in both your and Loopia Group's interest.
- Consent from you for that particular processing.

In order for companies within Loopia Group to develop, enhance and provide services to you, your personal data needs to be processed by companies within Loopia Group. Below you will find information about what Loopia Group uses your data for, and the legal basis each processing is supported by.





#### **Communication and support**

Loopia Group may use personal information from previous communication between you and a company within Loopia Group in order to provide better service. Examples include customer surveys, feedback and suggestions.

Legal basis: Legitimate interest and consent.

#### Development of services and products from companies within Loopia Group

Loopia Group processes personal data on how you use services from companies within Loopia Group, and from your communication with these companies as a basis for improving your experience specifically and these companies services in general. Loopia Group also processes personal data required to handle billing and payments of the services you use with any company within Loopia Group.

Legal basis: Legitimate interest.

### **Marketing**

Loopia Group processes personal data about what services you use from companies within Loopia Group and how you use them, in order to market relevant products and services to you according to your needs. Loopia Group also processes personal data required to handle billing and payments of the services you use with any company within Loopia Group.

Legal basis: Legitimate interest and consent.

#### Security and prevention of abuse

Loopia Group processes personal data in order to detect and prevent the following for the services and network of the companies within Loopia Group:

- abuse
- intrusion attempts
- attacks such as viruses and DDOS
- legal and regulatory compliance violations
- terms violations

Legal basis: Legal obligation, Legitimate interest.



#### **Regulatory obligations**

Loopia Group processes personal data in order to comply with the requirements of the law.

Legal basis: Legal obligation.

## For how long time Loopia Group processes personal data

Loopia Group processes personal data as long as there is a documented purpose for the processing. Contact us for details.

## With whom does Loopia Group share personal data

#### **Partners and subcontractors**

Loopia Group has agreements with all partners and subcontractors in the EU, and EU standard contract clauses for all outside the EU. EU/US Privacy Shield certification is used if the processing takes place in the United States. The agreements regulate what personal data is being processed, why the processing is done, how personal data are to be protected and for how long it is being processed. The agreements also contain instructions from the data controller to the data processor on how personal data should be processed.

Loopia Group strives to never share more personal data than absolutely necessary with each partner.

Loopia Group implements appropriate safeguards to ensure that your personal data is handled in accordance with applicable laws regarding security and privacy, and applies the same requirements to subcontractors.

Loopia Group updates this list with changes in personal data access conditions when such changes are planned. Changes are included in this list at least one month before the change is implemented.

For the following purposes, Loopia Group may share certain data with the mentioned partners and subcontractors.

#### Marketing and analytical purposes

#### Partner Personal data that is shared and why

Exponea	Customer information needed for marketing purposes in order to provide you with relevant information and offers on products and services according to your needs.
Google	Analysis data via third-party cookies as well as pseudonymized email addresses for marketing and web analytics to improve our services. Analysis of customer contact information, account information in Google G Suite (Drive, Docs, Sheets) for product development.





Customer information needed for marketing purposes in order to provide Vainu

you relevant information and offers on products and services according to

your needs.

#### Other

Slack

#### Partner Personal data that is shared and why

Customer account metadata is occasionally used in the Jira and Confluence Atlassian products for customer support, product development and internal

knowledge sharing.

Loopia Group intercompany and intracompany communication for providing customer service and troubleshooting. This includes customer

contact person contact information, technical customer metadata,

customer invoice information, customer support case information and

events in technical logs.

Websupport S.R.O.

Data required for Loopia Group's Slovak subsidiary to provide and manage the use of Slack, a communications platform. This includes all Slack

conversations for data retention and portability purposes.

#### **Authorities**

Loopia Group may be required to provide certain personal data by law and authority decisions upon request from for example the police.

## How Loopia Group protects your personal data

Loopia Group uses industry standard methods to store, process and communicate sensitive information such as personal data and passwords in a safe way. For example, SSL/TLS, PGP, and one-way hash algorithms.

The protection is implemented using systematic, organizational and technical measures to ensure integrity, confidentiality and accessibility.

Loopia Group employees are bound by confidentiality agreements and only processes data their specific tasks require.

## You control your personal data

You control your own personal information, meaning that you decide which data you want to share and what processing of your personal data you approve. You can revoke your consent at any time.

Learn more about what rights you have regarding your personal data »





# How your personal data is processed when you are no longer a customer of any company within Loopia Group

When you terminate your account from any of the companies within Loopia Group, each company will remove all your personal data where there is no legal basis for further processing. Each company also notify any potential partners and subcontractors who processed your data to also delete the data.



# Your rights

You are entitled to receive information from Loopia Group about the processing of your personal data and what the purpose is when we act as data controller.

The information below is a summary of how Loopia Group fulfils your rights regarding your data in accordance with the General Data Protection Regulation (GDPR).

## **Right to information**

You have the right to request an excerpt of your personal data where you specify what information you wish to receive.

## Right to rectification

If you find that your personal information that Loopia Group processes is incorrect or missing, you are entitled to request that the information is being updated. Once the adjustment is completed, any partners and subcontractors that are also affected by the adjustment will be notified by Loopia Group.

## Right to deletion ("the right to be forgotten")

You have the right to have your personal information deleted if ...

- ...the data is no longer needed for the purposes for which they were collected.
- ...you revoke your consent for data that has no other legal basis.
- ...the data processing purpose is direct marketing and you oppose the processing.
- ...you oppose legitimate interest as a legal basis and there is no other legal basis that is stronger.
- ...the personal data have not been processed according to GDPR.
- ...deletion is required to fulfill a legal obligation.

When deletion is completed, Loopia Group will also notify any partners and subcontractors affected by the adjustment.

## Right to restriction (from 2018-05-25)

In some cases, you may request that the processing of your personal data should be restricted. The restriction means that the data is labeled in a way that only allows processing for certain limited purposes in the future.

- If you believe that your personal data processed by Loopia Group is incorrect and has requested adjustment or completion, you may request that processing should be restricted while the adjustment is being investigated.
- If the processing of your personal data is illegal, but you oppose the removal of the data, you may instead request a restriction of use.
- When Loopia Group no longer processes the personal data for the purpose of the processing, but you need the data to determine, enforce or defend legal claims.





• When you have objected to processing while waiting for verification regarding if Loopia Group's legal reasons are stronger than your justified reasons.

When the restriction expires, you should be informed accordingly.

## Data portability (from 2018-05-25)

In some cases you may have the right to obtain and use your personal data elsewhere.

This applies when you ...

- ...shared the data yourself with Loopia Group.
- ...submitted your consent for the data processing.

This does not apply when we process your data ...

- ...because of legitimate interest.
- ...due to legal obligation.

Loopia Group is obligated to facilitate the transfer of your data.

## Right to object

You have the right to object to Loopia Group's processing of your personal data if the processing is performed based on the legitimate interest of Loopia Group.

If Loopia Group opposes your objection, we need to be able to show reasons for processing that are stronger than your interests.

When it comes to processing regarding marketing, you are always entitled to object to the processing at any time.

## **Automated decision making**

You are entitled not to be the subject of a decision based solely on any form of automated decision making, including profiling, if the decision may have legal consequences for you or affects you with similar significance.

# **Complaints**

If you believe that Loopia Group processes data about you in violation with GDPR, you should notify <u>Loopia Group</u> as soon as possible. You can also file a complaint with the <u>Your national data protection agency</u>.

# **Request indemnity**

If you suffered damage due to your personal data being processed in violation of GDPR, you may be entitled to indemnity. You can then file a claim for indemnity to Loopia Group or prosecute in court.





# Cookies and how Loopia Group uses them

Loopia Group's website uses cookies. A cookie is a small text file stored on your computer.

## Loopia Group uses two types of cookies:

- Session cookies: A session cookie is only saved temporarily during your site visit.
- **Persistent cookies:** Persistent cookies are stored in a file on your computer for a limited time. They are used to improve your experience as a recurring visitor of Loopia Group's website. Some persistent cookies are so-called third-party cookies from tools used for analytical purposes to improve services and experience from companies within Loopia Group, as well as certain types of marketing. Loopia Group's website uses third-party cookies from Google for analytical purposes.

## **Deny cookies**

Your browser can be set to automatically deny cookies. You can also delete previously stored cookies. Read more on your browser's help pages to find out how to do this.

Loopia Groups's website works as expected if you deny persistent cookies and third-party cookies, but if you deny session cookies we can not guarantee that the site is functioning as promised.

#### More information about cookies

Learn more about cookies on Your national data protection agency.