Latest update: 22 February 2023

PRIVACY POLICY

Appropriate processing of personal data and maintaining trust are of utmost importance to Oy Fision Ltd (Fision). We are committed to protecting personal data as required by law, and in this Privacy Policy we describe the purpose of using personal data, the legal basis, where the data is obtained, where the data is disclosed, whether it is processed outside the EU/EEA area, how the data is protected and how the data is stored and deleted. This Privacy Policy also informs of the right to your own data. Please also familiarize yourself to the site's Terms of Use.

General Data Protection Statement

Oy Fision Ltd. is committed to protecting your personal data in compliance with the Finnish Data Protection Act and the EU General Data Protection Regulation No. 2016/679 (the EU General Data Protection Regulation, GDPR). When we use terms such as "personal data", "processing", "controller" and "processor of personal data", they have the meanings defined in data protection legislation.

This Privacy Policy applies only to Fision's websites (fision.fi including consulting.fision.fi, which have a link to this Privacy Policy) and material sent by e-mail or via the website (e.g. feedback).

Our website may also have links to third party websites. We are not responsible or liable for the content of third party websites or resources. Please read their privacy terms and policies before using them.

Minors

This website is not intended for use by persons under the age of 16. We do not knowingly collect any personal information on this website from people under the age of 16 without the prior and verifiable consent of their guardian, and the guardian has the right to request access to the information provided by the child and request its deletion. In addition, all minors must obtain their guardian's permission before using or disclosing any personal information through this website or resource.

The Controller and the Controller's Contact Information

Oy Fision Ltd. acts as the registrar. Address: Kappelietie 6 B, 02210 Espoo.

You can contact the data controller by post at the address above or by email at info@fision.fi

How and Why We Process Your Personal Data

We may request your personal information on our website or by e-mail, for example, to respond to requests and inquiries, to receive feedback and to maintain websites and their security.

Personal information that we may collect and from which you can be directly identified is, for example, your name, contact information, email address and any other information combined with this identification information.

Fision and its business partners (such as service providers or other third parties who provide certain services to Fision) only collect this information if you choose to provide it to us. This Privacy Policy applies to the processing of the personal data you send.

More Information on the Processing of Personal Data

The following table contains more information about each processing activity we perform, the types of data collected in connection with each such activity, the legal grounds for processing and the applicable articles of the EU General Data Protection Regulation (GDPR)..

Purpose and Categories of Data	Legal Basis	Reference
Responding to requests and inquiries, feedback We can use the information you give us to be able to respond to your requests, for example when you send us a request related to our products or an inquiry related to a service or when you join our mailing list. Depending on your request, we may collect your contact information (e.g. your name, email address, postal address, telephone number and professional title), information about your interests and preferences (e.g. products or services that interest you) and any other information you provide us.	We collect and process your personal data for these purposes based on our legitimate interest in order to respond to your requests or feedback. If you send sensitive personal data with your request, we will also process them based on your express consent.	GDPR artikce 6(1)(f) GDPR article 6(1)(a) and 9(2)(a) GDPR article 6(1)(c)
Maintaining and updating the website We use the information we collect to protect our websites, online systems and other assets. Such information may include, for example, your IP address, geographic location, the resources you use and similar information.	We collect this information automatically for our legitimate business purposes in order to maintain, update and secure our websites.	GDPR article 6(1)(f)

Cookies and Other Tracking Technologies

Cookies refer to data that the web server stores on the visitor's hard disk of the computer, smartphone or tablet in order to identify the visitor on the website. With the help of cookies, visitors to the website can be offered e.g. targeted content and product recommendations, the language selected for transaction may be recognized and the service may be developed to be even more customer-friendly. Please note that the default settings of the web browsers used on the computer probably accept cookies, but they can be deleted from the browser after using the service or rejected from the web browser settings.

Fision does not use cookies on its website.

Instead, we use cookies to track activity on LinkedIn. These cookies do not tell us who visits the pages, but we can collect a target audience based on the information, to whom we can show more targeted content. Check out the <u>LinkedIn cookie policy here</u>.

Use of Data for Marketing

We will not sell or transfer your personal data to any third parties for their direct marketing without clearly informing you and obtaining your express consent. We may use third-party advertising agencies to place advertisements on other websites. Advertising agencies may use information about your visits to the above websites to measure the results of advertising and to target you with advertisements for our products and services that you may be interested in.

Information Sharing and Recipients of Personal Information

Recipients of Personal Data

We may share your personal information with third parties, such as our service providers, for the following purposes:

- To help to fulfill business transactions of Fision;
- To perform technical maintenance of our websites and other online platforms;
- To facilitate a merger, consolidation, transfer of control or other business arrangement in which Fision is participating or which is the result of financial arrangements undertaken by Fision;
- To respond to requests from competent authorities or requirements set by applicable laws, court orders or government regulations; and
- meeting the company's audit requirements or to investigate or respond to a complaint or security threat.

Transfer of Personal Data Abroad

Fision's website is located on a Finnish server and Fision does not transfer personal data abroad.

Personal Data Retention Period

The storage period of personal data depends on the purpose for which we collect and process your data. In order to fulfill our obligations, we store your data for the entire duration of the customer relationship. We delete information about a person from the register at the latest when there have been no active measures with the customer in five years and the person is not related to a pending matter. If required by law, we will keep personal data a longer period of time.

Information about Your Rights Regarding Your Personal Data

You have the following rights related to your personal data:

- 1. The right to request access to your personal data in Fision's register;
- 2. The right to request that your incorrect or incomplete personal data is corrected;
- 3. The right to request a copy of your personal data in electronic form so that you can send the data to third parties, or the right to ask Fision to transfer your personal data directly to one or more third parties;
- 4. The right to object to the processing of your personal data for marketing or other purposes; and
- 5. The right to request the deletion of your personal data when they are no longer needed for the purpose for which you have provided them, and the right to limit the processing of your personal data to certain purposes only, if data deletion is not possible.

If you want to exercise these rights, contact us using Fision contact details mentioned above.

Please note that deleting data or restricting their processing ia only possible to the extent that the processing of your personal data is based on your consent or our legitimate interest. If data processing is based on consent, you have the right to withdraw your consent at any time. In this case, we may retain a copy for archival purposes and to avoid adding information about you to our systems after your request.

If you suspect or f it seems to you that our data processing does not comply with the requirements of the EY General data protection Regulation, you have the right to file a complaint with supervisory authority responsible for the matter. In Finland, the competent authority is the Data Protection Ombudsman, whose contact information is below:

Office of the Data Protection Ombudsman Address: Lintulahdenkuja 4, 00530 Helsinki Postal address: PO Box 800, 00531 Helsinki

email:

tietosuoja(at)om.fi Telephone: 029 566 6700

Data Security

Fision and its service providers and partners who access or receive personal data through theis website or via e-mail have taken reasonable steps to protect personal data from unauthorized access, loss, misuse, disclosure, alteration or destruction. Principles of registry protection:

- Manual material: Materials that may be stored on paper are stored in locked and access control facilities. The personnel of the registrar are bound by confidentiality obligations.
- Electronically processed information: Personnel access to the register's electronic
 data content is protected with personal user IDs and passwords. Access to some of
 the data content of the register is restricted to a limited group of users. The
 environment is protected with appropriate firewalls and other technical protections.

The purpose of the actions presented above is to secure the confidentiality, availability and integrity of the personal data stored in the register, as well as the realization of the registered rights.

However, Fision cannot guarantee the protection of personal data, and it disclaims to the fullest extent permitted by law of all liability and damages caused by unauthorized access to personal data or the loss, misuse, disclosure, alteration or destruction of data. We recommend that you take all possible precautions to protect the personal information you submit through this website or digital solution.

Updates to this Privacy Policy

This privacy policy may be updated from time to time. The changes made to the data protection policy can be seen on this page. Fision recommends reading the privacy policy regularly for possible changes. The date when the privacy policy was last changed is shown at the top of this document.