

Description of Data Processing regarding company customers and other stakeholders

Controller	Haltian Oy Yrttpellontie 1D 90230 Oulu Finland
Contact Information	privacy@haltian.com
Categories of personal data and data subjects	<p>Categories of Personal Data. We process personal data provided by you or collected from publicly available sources:</p> <ul style="list-style-type: none"> • Basic Information, such as name, company details and contact information • Inquiries, such as information related to communication with company customer and/or other stakeholder • Agreement related information, such as service or cooperation agreement related information in connection with our business. <p>In addition, we observe the following information from the usage of our services, including Haltian website:</p> <ul style="list-style-type: none"> • Usage data. When you use services provided by us, we may collect usage information such as content of your account, registration log, login/logout, time stamps of usage activities, including how you open and close communication sent by us • Cookies. When you browse our websites, we collect your cookie-related data including advertising identifier. <p>The categories of data subjects are the following:</p> <ul style="list-style-type: none"> • Leads • Potential Customers • Customers • Contact person of other stakeholder, such as supplier or cooperation partner
The legal basis and purposes of the processing	<p>Legal basis.</p> <p>Legitimate Interest. We process your personal data for the following purposes based on legitimate interests pursued by us:</p> <ul style="list-style-type: none"> • Analytics and development purposes, including creating aggregated groups based on your usage activities. This also enables us to understand our users' needs as customers and to improve the quality and user experience of our current and future services and offerings. • Marketing purposes, including communicating with you about our offerings, conducting sales promotions, and other marketing campaigns, as well as creating aggregated target groups for marketing. Knowing customers' preferences enables us to target our offerings and provide products and services that better meet the needs and expectations of our customers. • Information and account security purposes, including detecting or preventing various types of misuse of services and fraud to provide you with secure and reliable services. • Electronic Direct Marketing and communication via email. We may send you electronic direct marketing, such as

	<p>newsletters, promotions about new products as well as information about user surveys and trials, by email. You can opt-out such electronic direct marketing or communication at any time free of charge by clicking on the “unsubscribe” link included in our newsletters, adjusting the settings of your user account, or by contacting us directly.</p> <p>Agreement. We use your personal data to fulfil the contractual obligations. This requires us to process your data for the customer/partner relationship management, support, and communication, conducting customer surveys, customer complaint handling, maintenance, software and system updates, user identification as well as for problem diagnosis and fixing. Hence, the above-mentioned processing of your personal data is based on your contract with us.</p>
<p>Sharing of personal data</p>	<ul style="list-style-type: none"> - Our third-party vendors, who provide us with cloud-based IT and business support as well as customer care services, may need to process your information. All such third parties are operating under contract and acting on behalf of us. - Competent authorities. When required in response to a legal process or request from a competent authority according to applicable laws or in connection with a legal proceeding or process. - Mergers, acquisitions, or sale of assets. When required as part of a merger, acquisition, sale of assets (such as service agreements) or transition of service to a group entity or another company. - Third Party Advertising Platforms. When our digital marketing activities utilize different third-party advertising platforms' features, we may target you by uploading your account information (e.g., a hashed email address or phone number) or advertising ID to such platform. We may also use third-party tracking platforms, which collect data about how users interact with our ads for ads attribution analysis and effect evaluation purposes. Such third parties are operating under contract and acting on behalf of us and include data transfers to partners located in the US.
<p>International Transfers</p>	<p>When transferring and disclosing your data outside the EU/EEA in above mentioned situations, where the local law may not provide the same level of protection, we comply with applicable legal requirements for providing adequate safeguards to such transfer by e.g. using the European Commission's Standard Contractual Clauses (SCC).</p>