Data Processing Policy

15th May 2019

Granite platform and services

Granite

Kauppakatu 3 A	Vantaankoskentie 14
33200 Tampere	01670 Vantaa
Finland	Finland

1. Data processor and controller

Supplier - "Data processor"

Granite Partners Oy, Kauppakatu 3 A, 33200 Tampere, Finland (Business ID FI19722011)

The Supplier referred to in this data processing policy has committed to supply the Customer with the service detailed in the supply and license agreement, as well as to provide related maintenance of the service. The name of product is Granite service platform.

The Supplier act as Data processor on behalf of the Customer.

Customer - "Data controller"

The Customer referred to in this data processing policy has concluded a supply and license agreement with the Supplier for the use and related maintenance of Granite service platform. In connection with the concluding the agreement, a decision has been made regarding who on the Customer's side will act as Customer's main user, save and maintain the Customer's contact and user information in the Granite service platform.

The Customer acts as a data controller for its own personal data ("Customer's personal data").

2. Contact person concerning data -related matters

In matters relating to this personal register, please contact Data protection officer and/or admin user at your company. The Customer informs its own personnel and its own customers of its data protection policies according to its own policies.

If you have any questions about security or privacy issues, please contact our support service (support@granitegrc.com).

3. The purpose of the service and the grounds for processing personal data

All personal data registers and the contents have been established in order to implement the supply and license agreement between the Supplier and the Customer. The personal data are divided into two categories: user data of those using the Granite service platform and the data entered for services managed by Customer.

The Supplier will not process the Customer's data for any other purpose than that has been agreed on in the agreement and only to the extent that is necessary in order to fulfill the customer agreement.

4. Processing of personal data in the service

User account management and granting of privileges for the Granite's service platform are carried out by the Customer or at the Customer's request by the Supplier. The customer also independently processes and manages personal data registers related to the service and the data content of these registers.

Typical personal data

To ensure the use of the service, typical personal data is required of users. The personal data typically used include first name, last name, email address, username, organization and preferred language.

Special personal data

Personal data generated by the Customer or generated by Customer's use to the Granite service platform are considered as special personal data and their content varies according to the services and functionality used by the Customer. The Supplier's personnel do not independently handle Customer's personal data, except when the Customer request it or when the providing the agreed service requires it. All Granite employees have signed a confidentiality agreement and access to customer and personal data is limited based on their duties.

Periods of retention

The data of customers who have a valid support service agreement with the Supplier, the Supplier will keep the data in the service for at least the duration of the contractual relationship. In the supply agreement the parties have agreed upon the Customer's retention period in the termination of the contract. If no requirements are specified in the agreement, the information will be deleted within three months of termination of the customer agreement.

5. Sub-processors of personal data

The Supplier will not disclose personal data to third parties, other than pre-selected sub-processors, or use it for other purpose than the fulfillment of the Customer's supply agreement. We utilize Mailgun service, including Rackspace and Softlayer, for sending Granite service platform's automatic email notifications.

6. General principles of personal data use and protection

The Customer's personal data will be handled only by those employees who are responsible for fulfilling the Customer's supply agreement. The Supplier's privilege management is carried out using a role- based user management process in which each employee is given only those privileges required for their task and job description. Personal data is edited over encrypted network connections.

All data concerning the Customer is accessible only using the personal usernames and passwords of the authorized employee and possibly with other supplementary identification methods.

The Supplier maintains privacy and security descriptions of Granite service platform on its website: https://granitegrc.com/security-privacy/

7. Rights of data subjects

According to the current data protection legislation, the Customer's personal data forms a personal data register, in which the data subjects have rights to their data as provided for in regulations and laid down in the legislation, such as the right of the data subject to access data (inspection right), requiring rectification, deletion or limitation of the data.

The customer's user should contact the Data protection officer or admin user of their own organization if they want to use their legal rights.

The Supplier is not directly responsible for the user inquiries or requests received by the Customer, as all personal data saved in the Granite's service platform are based on data updated by the Customer's users or on Customer's request for data transfers from other Customer systems.

8. Contact

For all unclear questions regarding the handling of personal data as described in this policy, the Customer must contact the Data protection officer or admin user of its organization or the Granite support service (support@granitegrc.com).

If necessary, the Supplier may ask the Customer to provide additional information or to specify their request in writing.