



PRIVACY POLICY

CUSTOMERS AND MARKETING

21.5.2018

Granite

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Finland

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Data privacy is of high importance for Granite Partners Ltd. ("Granite" or "we") and we want to be open and transparent with our processing of your personal data. We therefore have a policy setting out how your personal data will be processed and protected. The purpose of this policy is to inform Granite's website or service users and individuals who have left their contact information via contact information forms.

By using our website, our services or leaving us your contact information, you agree that your personal information will be processed in accordance with this privacy policy and applicable legislation.

Personal data collected from the user and the purpose of use

Using the services: To use our services, you will need to enter your email address and password of your choice for the username. You can also voluntarily give your first and last name and name of your organization and enter data to the service, in which case you are a data controller of your own data. To provide you with the services, we will automatically create a unique username and save registration time, IP address, user interface language, user type and usable services when using our services.

Purchasing our service: When you buy services from us, you need to provide us with certain payment transaction information so that we can manage your subscription requests, payments and identify you in our services. The personal information is handled to fulfilling the legal duties, such as taxation and accounting. For accounting and taxation purposes, we must know e.g. which products the you have purchased, how much the products cost, which payment service provider was used and which country the purchases were made from. Your contact information is required in case any problems or misuse issues related to payments arise.

Customer service and informing: So that our customer service can answer your questions or feedback, we may need your personal information, such as name, address phone number and email address. You can also give your contact information to us by ordering trial account to our services or through our website by filling out a contact or tailored offer form. The collected contact information and user information will be used to resolve support requests and to send you the benefits and useful information for marketing purposes.

Cookies: In order to be able to access our services, we will save your login information with cookies. Additionally, your movements and actions in our trial services and website will automatically form analytics data to develop our services and to show you targeted advertising. You have right to oppose such advertising or to cancel your consent for this purpose by preventing targeting cookies from your browser's cookies setting.

Other information collected and processed: Our customer service or product development may manually add comments about you, such as who our salesperson has been in contact with you, so we can offer you better customer service and improve your user experience in our services.

In case there are essential changes to the usage purposes of personal information or new purposes are taken into use, we will inform you in advance before carrying out the changes. In these cases, we must also ask your consent to such essentially changed or new usage.

Legal grounds of processing personal data

Granite collects and processes personal information mainly on the grounds of consent, performance of a contract, grounds related to the company's compliance with legal obligations, and legitimate interests. Grounds related to performance of a contract means that certain information has to be collected from you to make it technically possible to use and purchase the service. Compliance with a legal obligation means processing personal information e.g. for the purposes of performing the company's duties related to accounting and taxation. The company may have legitimate interests related to the following functions among others: customer service, handling of misuse cases, product and service development.



Before you register to our service and submit personal information to us, you are requested to read the contents of our Privacy Policy carefully before consenting to the processing of your personal information. The request for consent is presented clearly and separately from other matters, in an understandable and accessible form, in clear and simple language. At the same time, you are informed that you have the right to withdraw consent at any time. If you do not want to provide your personal information based on the contractual need, the statutory obligation of the company or the other legitimate interest of the company, our services can't be used.

Sources of personal data

Personal information is collected mainly from yourself, either directly or through cookies. Information is also generated automatically during registration, purchase and use of the service. Personal information can also be collected and updated from the registries of third parties for example credit information register.

Sharing personal information with third parties

We never share, sell or exchange your personal information for marketing purposes to third parties. Personal information shared to a third party will only be used to provide our services to you. Personal information will be shared with payments service providers which charge for products and services ordered from Granite. For credit information companies for identification and credit check and debt collection companies, in only possible debt collection cases. Additionally your personal information will be shared with marketing automation platforms for marketing and sales management tools to support sales. We use third-party tools for collecting statistics on our website in order to optimize websites, as well as to provide you with better services.

We may share information about you to other third parties if you have given your consent to it. We may use subcontractors to handle your information if such usage happens according to the requirements of the EU Data Protection Regulation. We use contractual arrangements to ensure that subcontractors are operating under obligation of confidentiality and that they will carry out the appropriate technical and organizational actions in connection to processing personal information.

Retention of personal information

The personal information collected from you will be stored in the European Economic Area ("EEA"), but your personal information may also be transferred and processed outside an EEA country. All personal data transfers are made in accordance with applicable laws.

We will keep your personal information as long as you use one of our services. We will keep your personal information for a maximum of 24 months from the last update unless the customer specifically requests the deletion of the information or it has not been specifically agreed on the service contract. Information related to purchase events may be stored even after this time, to the extent and for the time the service provider believes it necessary to store this information in order to carry out accounting and other legal obligations.

Right to inspect and right to request correction

We do not check the correctness of the information submitted by the users. When you logged in to the service, you can check and change settings related to the use of the service, as well as the personal information submitted during registration.

You have the right to request a copy of all other information concerning yourself from our customer service, as well as the right to request correction of any possible incorrect information in the system from the customer service. The copy can be requested by email at support@granitegrc.com. Requesting a copy



is free in principle. However, we may charge a reasonable fee for repeated information requests on the grounds of administrative expenses or refuse to perform the action requested by you if the request is clearly baseless and unreasonable.

Other rights

You always have access to your own information. You can update, change or delete your outdated or inaccurate information or transfer your personal information from one registry keeper to another and withdraw consent to such personal data processing that is not based on performance of contract, the company's compliance with legal obligations or the company's legitimate interests, by sending an email to support@granitegrc.com. All other information apart from that which is required by official authorities and data generated by the use of the service and required for research and development can be deleted from the database manually. Note that data generated by use of the service, after other information has been deleted, can't be connected to you, in other words, it becomes anonymous information.

You can forbid the use of your information for direct marketing purposes, marketing research and opinion polls. We practically send all marketing letters and research invitations by email. You can unsubscribe from these by clicking the newsletter unsubscribing link that can be found in the footer of each newsletter.

If you are of the opinion that Granite does not comply with the Finnish Personal Data Act or the requirements of the EU Data Protection Regulation, the User has the right to file notice of appeal to an authority. In Finland, this authority is the Data Protection Ombudsman.

Our site may contain linked to other sites. We are not responsible for the privacy practices of other websites. We recommend reading the privacy policies of linked sites because their policies and practices may differ from us.

Protection of personal data

Protecting your personal information is important for us. We maintain administrative, technical and physical security measures to protect privacy data we hold from unauthorized disclosure, use, alteration and destruction. We are committed to using appropriate security measures to protect our customers' privacy information from foreseeable threats. However, if there is a security breach that results in a high risk to your rights and freedoms, we will notify you without delay. More information on privacy and information security description of our service production. Other parties connected to providing the service are responsible for their own data security.

Contact information in personal information matters

If you would like to us update your contact information or if you have any questions about the use of personal information, please contact our customer service support@granitegrc.com.

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