



## PROCESSING OF PERSONAL DATA

1<sup>st</sup> October, 2025

Granite platform and services

Granite

Kauppakatu 3 A

33200 Tampere

Finland



## 1. Data processor and data 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 the product is Granite platform.

The Supplier acts as a Data processor on behalf of the Customer.

Data Protection Officer contact details

Privaon Oy acts as a DPO

support@granitegr.com

### **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 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 platform.

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

## 2. Contact details concerning personal data related matters

In matters relating to this personal register, users should contact a data protection officer and/or admin user at their own organisation. The Customer informs its own personnel and its own customers of its data protection policies according to its own policies.

Granite Customer Support (support@granitegrc.com) will respond to any inquiries and, if necessary, forward communication to the Customer.

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

When Granite processes personal data on behalf of the Customer, the legal basis for personal data processing is agreement. The list of Customer specific tools is found on the main agreement's appendix. The Customer, who is the data controller, is responsible for defining the purpose of processing.

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 platform and the data entered for tools 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 privileges for the Granite 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 data, preferred language, and usage log data.

### Customer specific personal data i.e. data on the Granite platform tools

Customer specific personal data is defined on the service agreement and its appendices.

### 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 data will be deleted within 1 month and separated & encrypted backups within 12 months of termination of the customer agreement. For special reason, as a request from authorities, data can be stored for longer period. If this would be the case, the Customer will get notified.

## 5. Sub-processors of personal data

Personal data will not be disclosed by the Supplier to any parties other than specifically selected processors, nor will it be used for any purpose other than fulfilling the customer agreement. All processing of personal data takes place within the EU/EEA area. The sub-processors of personal data and their roles are as follows:

- Equinix (Finland) Oy: Sub-processor providing data center services in Finland for the Granite platform.
- Flowmailer B.V. (Spotler): Sub-processor providing email services in the Netherlands for automated reminders sent by the Granite platform.
- Microsoft: Sub-processor providing AI services within the EU/EEA area for the Granite platform.
- Mintly Oy: Sub-processor providing firewall services in Finland for the Granite platform.

## 6. Data transfers to third countries

The personal data is not transferred outside EU or EEA.

## 7. 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 access 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 processed 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 takes care of technical and organisational data protection and information security measures, among other things with the following actions:

- Information Security Management System (ISMS) is certified according to ISO/IEC 27001 standard
- All employees have signed a non-disclosure agreement
- Access to customer data and personal data is restricted according to job descriptions
- All workstations contain malware protection with automatic updates
- All workstations contain firewalls
- All systems are updated regularly
- Personnel are trained regularly related to data protection and information security

The Supplier maintains separate privacy and security policies for managing Granite platform.

## 8. Rights of data subjects

According to the current data protection legislation, 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 organisation 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 platform are based on data updated by the Customer's users or on Customer's request for data transfers from other Customer systems.