

Treanglo Oy's Privacy Notice

With this Privacy Notice we provide you (see Section 3) information in accordance with Articles 13 and 14 of the EU General Data Protection Regulation before we process your personal data. We inform our employees individually in the proper manner. **Note: this is an unofficial translation. In case of any discrepancies, the Finnish original prevails.**

We also act as a processor of personal data when we process the personal data of the merchants' members on behalf of the merchants through our Kide.app service. We apply the provisions of our Data Protection Agreement with regard to the processing of that personal data (see Section 9 of Merchant Terms).

We may unilaterally amend this Privacy Notice. Amendments to this Privacy Notice will take effect immediately when we post an updated version of this Privacy Notice on our website.

1) General information

Controller:

Treanglo Oy (2623329-1)
Valhallankatu 16 A 10, 00250 Helsinki

Contact person

Arttu Väisänen
arttu@treanglo.com

2) Processing of personal data

Purpose of processing	Legal basis for processing	Data subjects and personal data
(a) Customer relationship	<p>Agreement</p> <p>⇒ We must implement agreements.</p>	Customers and merchants: (i) contact details, (ii) data related to the operation of the Kide.app service, (iii) other data disclosed to us.
(b) Business partner relationships	<p>Agreement</p> <p>⇒ We must implement agreements.</p>	Business partners and potential business partners: (i) contact details, (ii) relationship data, (iii) other data disclosed to us.
(c) Direct marketing (emails, phone calls and text messages)	<p>Our legitimate interests</p> <p>⇒ We have to implement, establish and develop customer relationships and develop the way we conduct business.</p> <p>NB! You have a right to refuse direct marketing regarding each instance of marketing</p>	Customers, merchants and potential merchants: (i) contact details, (ii) relationship data, (iii) other data disclosed to us.
(d) Recruiting	<p>Our legitimate interests</p> <p>⇒ we have to control our recruiting.</p> <p>NB! You have a right to refuse our processing of your personal data.</p>	Job applicants: (i) contact details, (ii) résumé data, (iii) other data disclosed to us by a job applicant.

(e) Contacts and social media

Our legitimate interests

⇒ We have to control contact requests addressed to us.

NB! You have a right to refuse our processing of your personal data.

Persons who contact us: (i) contact details, (ii) relationship data, (iii) other data disclosed to us.

(f) Cookies and other comparable technologies

Consent

⇒ consent given in accordance with the Information Society Code (917/2014).

Persons who visit our website: IP addresses.

3) Regular data sources of the register

The data of data subjects is collected regularly:

Purpose of processing

Data sources

See purposes (a)–(c) above

(i) Data subjects themselves, (ii) business partners, (iii) public sources, such as Internet, Posti, PRH and Digital and Population Data Services Agency.

See purposes (d)–(f) above

(i) Data subjects themselves.

4) Transferring personal data

We may transfer your personal data to third parties, such as data storage service providers, as a normal course of our business. When doing so, we ensure that the transfers are carried out in a secure way considering data security and that adequate data protection agreements are concluded.

Your personal data may be transferred to our business partners, data storage service providers, communication service providers and accounting and auditing service providers.

We may transfer personal data to third countries. When doing so, we ensure an adequate level of data protection by, for example, using standard contractual clauses issued by the European Commission, the Privacy Shield framework and other similar arrangements.

5) Retention period of personal data

Purpose of processing	Retention period
(a) Customer	We retain personal data for three (3) years after the customer relationship has ended.
(b) Business relationships	We retain personal data for as long as it is necessary, taking our line of business into account.
(c) Direct marketing (emails, phone calls and text messages)	We retain the necessary personal data until you inform us (i.e. opt out) that you do not want to receive marketing or when we detect that you no longer wish to receive marketing.
(d) Recruiting	We retain the necessary personal data for a maximum of twelve (12) months from the day we have received your job application if you have not become our employee.
(e) Contacts and social media	We retain the necessary personal data for three (3) years after the contact has been made.
(f) Cookies and other comparable technologies	The retention period depends on each cookie or other comparable technology used.

We can retain the necessary personal data of data subjects for a longer period than described above if it is necessary for the purposes of criminal investigation, possible judicial proceedings or other comparable reasons.

We periodically review the necessity of the data in the registers and keep a record of the reviews.

6) Rights of a data subject

Data subjects are entitled to exercise the rights listed below.

Contacts concerning the rights must be submitted in writing to the Controller's contact person mentioned in Section 1. Data subject's rights can be exercised only after the data subject's identity has been satisfactorily verified.

Right	Description
Right to inspect	A data subject has a right to inspect what data of theirs the Controller has retained.
Right to rectify and erase	A data subject has a right to request the controller to rectify or erase the personal data concerning the data subject on the grounds provided by law.
Right to restrict processing	A data subject can request the controller to restrict the processing of their personal data on the grounds provided by law.
Right to data portability	A data subject has a right to receive the personal data that they have provided to the Controller in a structured, commonly used and machine-readable format if the processing is based on consent or on an agreement between the Controller and the data subject and if the processing is performed automatically.

Right to object

If personal data is processed for direct marketing purposes, the data subject has the right to object at any time to the processing of their personal data for such marketing.

If personal data is processed on the basis of the legitimate interests of the Controller, the data subject has a right to object to the processing of their personal data for such purposes in accordance with the law.

Right to object to automated individual decision-making, including profiling

A data subject has a right not to be a subject to a decision based solely on automated processing, including profiling, that produces legal effects concerning themselves or similarly significantly affects themselves.

Right to withdraw consent

If the legal basis for the processing of personal data is consent given by the data subject, they have the right to withdraw their consent.

Each data subject has a right to issue a complaint to a supervisory authority if the data subject deems that the EU General Data Protection Regulation has been violated in the processing of their personal data. The complaint may be submitted in the EU member country where the data subject's permanent place of residence or employment is in or where the alleged violation has occurred.

7) Information security

We use at least the following information security practices to protect the personal data we are responsible for: (i) access to personal data is restricted; (ii) personal data is protected with anti-virus protection, anti-malware protection and other comparable programs; (iii) each personal data group has an assigned person in charge; (iv) we use reliable programs and systems that are up-to-date to guarantee the continuous confidentiality, integrity, usability and fault tolerance of the data; (v) we use reliable programs and systems that are up-to-date to guarantee that the data and access to it can be quickly restored in the event of a physical or technological fault; and (vi) we evaluate our personal data procedures periodically.

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+358 40 511 6600