

## **LOGMORE OY - PRIVACY POLICY FOR CUSTOMERS**

Last updated [2.12.2018]

This Privacy Policy (hereinafter "Policy") informs you why Logmore Oy ("Logmore", "we", "us" or "our") collects, uses or shares your personal data in connection with website [logmore.com] and for the Service provided on the website ("Service"). Please read this Privacy Policy carefully before you start using the Service.

### **1. DATA CONTROLLER**

The data controller in accordance with the applicable data protection law is Logmore. Logmore is responsible for ensuring that your personal data is processed in compliance with this Policy and applicable data protection laws.

Contact details of the data controller:

Logmore Ltd  
Business ID: 2812529-4  
Address: Vasarakatu 22, 40320 Jyväskylä, Finland  
Phone: +358 44 277 3423

Contact details of the data protection contact person:

Janne Juhala, CEO  
Address: Vasarakatu 22, 40320, Jyväskylä  
Phone: +358 44 277 3423  
Email: janne@logmore.com

### **2. COLLECTION OF PERSONAL DATA**

We may collect your personal data through different means, which are explained below. As a rule, the personal data processed by us is provided by you upon registration and/or when using the Service and Logmore's other products. The personal data we collect includes e.g. the following categories of data:

- Name and date of birth;
- Contact details, such as email address, address and phone number;
- Information relating to customer relationship, such as billing information;
- Language preferences;
- Customer interaction, customer contacts and replies; and
- Data which is collected by Logmore's products and which may be associated to you.

We may also collect technical data on the use of the Service, which may be associated with you. The technical data we collect includes e.g. the following categories of data:

- Time stamps and log data relating to the use of the Service; and
- Device ID, device type, operating system used and application settings.

### 3. **PURPOSE AND LEGAL BASIS FOR PROCESSING PERSONAL DATA**

We process personal data for the following purposes:

#### **1. Service provision and managing your customer relationship**

The primary purpose of collecting personal data is to provide the Service and Logmore's products and to manage and maintain the customer relationship between us and you/the company you represent. In this case, our processing of personal data is based on the contract between you/the company you represent and us.

#### **2. Marketing**

We may send you emails to inform you about new features of the Service, ask you for feedback, or provide you other relevant information about our services. In this respect, processing of personal data is based on our legitimate interest to provide you relevant information as part of the Service and to promote the Service to you. You may object to marketing communications at any time (please see section 8 of this Policy).

#### **3. Service development and information security**

We also process personal data to ensure the security of the Service, to improve the quality of the Service and to develop new features to the Service. In these cases, the processing of personal data is our legitimate interest to ensure that our Service has an adequate level of data security, and that we have sufficient and relevant information at hand to develop our Service. When processing of personal data is based on our legitimate interest as mentioned above, we have assessed the processing of personal data by using a so called balancing test in accordance with data protection laws. You may object to processing based on legitimate interest at any time (please see section 8 of this Policy).

### 4. **TRANSFERS AND DISCLOSURES OF PERSONAL DATA**

We may disclose personal data to third parties:

- when permitted or required by law, e.g. to comply with requests by competent authorities or related to legal proceedings;
- when our trusted services providers provide services to us on behalf of us and under our instructions. We will control and be responsible for the use of your personal data at all times;
- if we are involved in a merger, acquisition, or sale of all or a portion of our assets; and
- when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.

### 5. **TRANSFERS OF PERSONAL DATA OUTSIDE THE EU/EEA**

We may transfer your personal data outside the EU or the European Economic Area when our trusted service providers working for us are established there. In these cases, we will take the appropriate steps to provide appropriate safeguard mechanisms for international data transfers as required by applicable European data protection laws, such as the EU General Data Protection Regulation ((EU 2016/679).

For example, our service provider transfers personal data to the United States during the course of them providing services to us. The service provider has ensured an adequate level of protection for

personal data by self-certifying to the Privacy Shield Framework. To learn more about the Privacy Shield Framework, please see [this link](#).

## **6. COOKIES**

We also use cookies and other similar techniques on our website at logmore.com. Cookies are small text files placed on your device to collect and remember useful information, to increase the functionality of our website and to make it easier to use. We may also use cookies and other similar techniques for statistical purposes to compile anonymous, aggregated statistics thereof, concerning e.g. the use of the website, allowing us to understand how users use the website and improve user experience.

You can set your web browser not to accept cookies, limit the use of cookies or remove cookies from the browser. However, as cookies are an important part of how our website works, limiting the use of cookies may affect the functionality of the website.

## **7. RETENTION OF PERSONAL DATA**

Your personal data will be retained only for as long as necessary to fulfill the purposes defined in this Policy.

Most of your personal data will be retained during the course of your customer relationship with X. Some personal data might be retained after your customer relationship with us has ended, if required or allowed by applicable laws. When your personal data is no longer required by law or rights or obligations by either party, we will delete your personal data.

## **8. YOUR RIGHTS**

You have a right to access personal data we process about you. You may access, correct, update, change or remove your personal data at any time. However, please note that certain information is strictly necessary in order to fulfil the purposes defined in this Policy and may also be required by law. Thus, you may not remove such personal data.

You have a right to object for certain processing. To the extent required by applicable data protection law, you have a right to restrict data processing.

You have a right to data portability, i.e. right to receive your personal data in a structured, commonly used machine-readable format and transmit your personal data to another data controller, to the extent required by applicable law.

Please send above-mentioned requests to us at [janne@logmore.com](mailto:janne@logmore.com).

If you think there is a problem with the way we are handling your personal data, you have a right to file in a complaint to your national data protection authority in the EU/EEA.

## **9. SECURITY**

We maintain reasonable security measures (including physical, electronic, and administrative) to protect personal data from loss, destruction, misuse, and unauthorized access or disclosure. For example, we limit access to personal data to authorized employees and contractors who need to know the information in the course of their work tasks.

Please be aware that, although we endeavour to provide reasonable security measures for personal data, no security system can prevent all potential security breaches.

**10. CHANGES TO THIS POLICY**

We may change this Policy from time to time. If we make any changes to this Policy, we will let you know it on our website at [web.logmore.com](http://web.logmore.com), where you will also find the latest version of this Policy.

**11. CONTACT US**

If you have any questions regarding this Policy or the personal data we process about you, please contact us at [janne@logmore.com](mailto:janne@logmore.com).

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