

Effective as of May 25, 2018

## **ZOINED PRIVACY POLICY**

Your privacy is important to Zoined, and Zoined is committed to complying with applicable data protection laws, including the General Data Protection Regulation (GDPR). This privacy policy provides information about the personal data Zoined collects and the ways in which Zoined uses that personal data. If you do not agree with this privacy policy, do not use the website or other services provided by Zoined (“Zoined Services”) or provide Zoined with any personal data.

### **What personal data Zoined may collect?**

Zoined may collect and use the following personal data:

#### **Contact Data**

In connection with use of Zoined Services, Zoined requires you to provide basic contact information such as name, company name, address, phone number, and email address (“Contact Data”).

#### **Usage Data**

As you use the Zoined Services, Zoined may also collect information through the use of commonly-used information-gathering tools, such as cookies and web beacons (“Usage Data”). Such Usage Data includes standard information from your web browser (such as browser type and browser language), your Internet Protocol (“IP”) address, and the actions you take while using the Zoined Services.

#### **Customer Data**

Customers of Zoined may electronically submit data or information to the Zoined Services for hosting and processing purposes (“Customer Data”). Zoined will not review, share, distribute, or reference any such Customer Data except as provided in the agreement between Zoined and the customer, or as may be required by law. In accordance with the agreement between Zoined and the customer, Zoined may access Customer Data only for the purpose of providing the Zoined Services or preventing or addressing service or technical problems or as may be required by law.

#### **Chatbot Data**

When interacting with our chatbot, we collect and store user messages and email addresses provided during the chat interactions. This data helps us to enhance the chatbot's performance, improve user experience, and respond to inquiries.

## **How does Zoined use personal data?**

- **Contact Data:** Can be used to communicate with you, for example, to inform you that our services have changed, to send you critical alerts and other notices relating to our service, and to contact you in customer care-related issues.
- **Usage Data:** Is used to provide better support and to personalize service, support the development of service features and functionalities, and improve user experience.
- **Customer Data:** Is used to provide analytics service to our customers. Customer Data is only shared with the parties authorized by the customer who provided such Customer Data.
- **Chatbot Data:** Is used to enhance the chatbot service, respond to user inquiries, and improve interaction quality.

## **Legal Basis for Processing Personal Data**

We process your personal data based on the following legal grounds as outlined in the GDPR:

- **Consent:** By using our services and providing your personal data, you consent to the processing of your data for the purposes described in this policy.
- **Legitimate Interests:** We may process your data to improve our services, ensure the security of our systems, and for business analysis and reporting purposes.

## **Does Zoined share your personal data?**

Zoined may disclose your personal data to its affiliates, subcontractors, and other authorized third parties for the purposes mentioned above. In the event Zoined discloses your personal data to such authorized third parties, they will be obliged to use personal data provided to them in accordance with this privacy policy. These authorized third parties are not permitted to use your personal data for any other purposes, and Zoined requires them to use appropriate security measures to protect your personal data.

In addition to the disclosures reasonably necessary for the purposes mentioned above, Zoined may disclose your personal data to the extent it is required to do so by law, in connection with any legal proceedings or prospective legal proceedings, and in order to establish, exercise, or defend its legal rights.

If Zoined decides to sell, buy, merge, or otherwise reorganize its businesses, it may need to disclose personal data to prospective or actual purchasers and their advisers, or receive personal data from sellers and their advisers.

## **How Zoined will secure your data?**

Zoined will take reasonable technical and organizational precautions to prevent the loss, misuse, or alteration of your personal data. Zoined will store all the personal data you provide on its secure servers.

## **Cross-border data transfers**

Information that Zoined collects may be stored and processed in and transferred between any of the countries in which Zoined operates to enable the use of the information in accordance with this privacy policy. For this purpose, your personal data may be transferred across international borders outside the country where you use our service, including to countries outside the European Economic Area (EEA) that do not have laws providing specific protection for personal data or that have different legal rules on data protection. In such cases, Zoined ensures that there is a legal basis for such a transfer and that adequate protection for your personal data is provided as required by applicable law.

## **Your Rights under GDPR**

Under GDPR, you have the following rights regarding your personal data:

- **Access:** You have the right to request access to your personal data and obtain a copy of the data we hold about you.
- **Rectification:** You have the right to request correction of any inaccurate or incomplete data.
- **Erasure:** You have the right to request deletion of your personal data when it is no longer necessary for the purposes for which it was collected.
- **Restriction:** You have the right to request restriction of processing of your personal data in certain circumstances.
- **Objection:** You have the right to object to the processing of your personal data based on legitimate interests or direct marketing.
- **Data Portability:** You have the right to receive your personal data in a structured, commonly used, and machine-readable format and transfer it to another data controller.

To exercise any of these rights, please contact us at [contact email].

## **Updating this policy**

Zoined may update this privacy policy by posting a new version on this website. You should check this page occasionally to ensure you are familiar with any changes.

## **Other services and websites**

This service may contain links to other services and websites. Zoined is not responsible for the privacy policies or practices of any third party.

## **What are your rights?**

You have a right to know what personal data we hold about you. You have a right to have incomplete, incorrect, unnecessary, or outdated personal data deleted or updated. You may exercise your rights by contacting us or by managing your account and choices through available profile management tools in our service. In some cases, especially if you wish us to delete or stop processing your personal data, this may also mean that we may not be able to continue to provide the service to you. If personal data has been submitted to us by a Zoined customer and you wish to exercise any rights you may have to access, correct, amend, or delete such data, please inquire with our customer directly. Because Zoined personnel have limited ability to access data our customers submit to our services, if you wish to make your request directly to Zoined, please provide the name of the Zoined customer who submitted your data to our services. We will refer your request to that customer and will support them as needed in responding to your request within a reasonable time.

## **Who is the controller of your personal data?**

Zoined Oy, Lapinlahdenkatu 16, 00180 Helsinki, Finland, is the controller of your personal data. If you have any questions about this privacy policy or the treatment of your personal data, please contact Zoined:

- by email to [support@zoined.com](mailto:support@zoined.com); or
- by post to Zoined Oy, Tallberginkatu 2A, 00180 Helsinki, Finland.