

## **Data privacy policy**

Description of file required by Personal Data Act (523/1999) section 10.

### **Controller of file**

Spinverse Oy (hereinafter "Spinverse")  
Tekniikantie 14  
02150 Espoo  
Finland

### **Person responsible for file matters**

Mikko Salminen  
Tel: +358 50 387 0007

### **File name and data subject**

Spinverse's customer data management system with customer information.

### **Purpose of use**

Managing customer relations / direct marketing according to related legislation and taking into account possible marketing refusals. Developing customer service and other business activities. Analytical and statistical work. Other similar purposes

### **Content of file**

The register may contain the following information: Contact details, including names, addresses, telephone numbers, e-mail addresses; Information on age, sex, profession and native language; Information needed for a customer relationship, such as billing and payment details, information on orders and products, customer feedback and contacts, competition entries and answers, and details of any cancellations; Information related to communications and the use of our services, such as browsing and searches; Any information provided by customers for their profile or in relation to their interests; Details of any permissions given by customers; Information on any requests to prevent offers being sent; Any other information compiled with customers' consent.

### **Legally permissible data sources**

Personal data on customers may be legally collected: From the customer by telephone, feedback forms or internet contacts, etc.; By e-mail or other similar channels; Through cookies or other similar technical means; From official national Population Information Systems, the postal service's address data system, and other similar private and public registers.

### **Disclosure of information**

Spinverse may disclose information to its subcontractors, partners and authorities as permitted or required by law.

### **Protection of the register**

Any physical materials related to the register will be stored in secure premises. Access to this information is protected using security systems, codes and passwords; and it is stored in full accordance with good information security practices.