Privacy Policy

This privacy policy describes how personal data is processed in connection with the Visma Sign service. This privacy policy is valid from 1 September 2017 onwards.

1. Data Collector

Visma Solutions Oy Business ID 1967543-8 Elielinaukio 5, FI-00100 Helsinki, Finland

Persons responsible for privacy policy and data collecting matters: Visma Solutions Oy, Antti Larvala, tel. +358 9 23 163 378, <u>antti.larvala@visma.com</u>

2. Purpose and Legal Basis of Personal Data Processing

Personal data is only processed in the service in connection with customer relationship management and to the extent that is necessary in order to provide the service in accordance with the terms of agreement concerning the service.

In connection with the service, personal data is collected from users for reliable user identification which is authenticated using electronic identification services provided by third parties that meet the high security level criteria referred to in Article 8, paragraph 2, subparagraph b in the EU Regulation No 910/2014 on electronic identification and trust services or the high security level referred to in subparagraph b in the said paragraph, using strong electronic identification services provided by third parties which are in accordance with the Finnish Act (7 August 2009/617 with subsequent amendments) on Strong Electronic Identification and Electronic Signatures, or using strong electronic identification services provided by third parties which are in accordance with other applicable legislation concerning electronic identification in effect in the country where the customer is located.

Personal data can also be used for direct marketing of services provided by the data collector, or companies which are part of the same group, to corporate customers.

3. Processed Personal Data

When *private customers* register in the service, the following information is saved:

- Last name and first name of person
- Date of birth
- Address and contact information.

When *corporate customers* register in the service, the following information is saved:

- Company or community name
- Register data
- Address and contact information
- Main user's first and last name, date of birth and contact information.

The customer's material saved in the service by the customer may also include other personal data, such as names, addresses and contact information of the contracting parties.

4. Personal Data Protection Principles

The following principles are applied to personal data protection:

- Data processing authorisation management is used for ensuring that only authorised persons may process personal data
- Persons processing personal data are bound by the statutory confidentiality obligation or have signed a non-disclosure agreement
- Personal data is stored in an information network that is isolated from the public communications network with firewall solutions
- Confidential data transferred via the public communications network is encrypted technically
- Documentation is stored in facilities protected by access control, and their use is monitored with access right management.

5. Release of Personal Data

The data collector shall only release personal data to their group companies and service providers in order to provide the agreed service in the required extent. The data collector may release the contact information of their corporate customers to their group companies for direct marketing purposes.

Personal data may be only be transferred outside the European Union or European Economic Area for customer service purposes and in accordance with the personal data legislation. In each individual case, the applicable condition for the personal data transfer is indicated in connection with the service. Unless otherwise indicated, personal data transfers to the United States shall be performed under the Privacy Shield arrangement between the EU and the United States (https://www.privacyshield.gov/US-Businesses).

6. Personal Data Retention Time

The personal data acquired in connection with service registration is only stored for the duration of the customer relationship, and, for the part of contact information, the period of time deemed necessary for direct marketing.

The data collector shall destroy the personal data acquired in connection with service provision and/or included in the material saved in the service without delay after the customer relationship has ended or at the request of the data subject.

7. Exercise of Data Subject's Rights

The data subject has the right to ask the data collector for access to the personal data concerning them, as well as for the correction, removal or processing restriction of said data, or to object to the processing of the data. Material saved in the service cannot be requested to be directly transferred from the data collector into the system of another service provider due to technical reasons.

The data subject has the right to file a complaint with the supervisory authority concerning the use of personal data in the service.