

PRIVACY POLICY

1 GENERAL

AddSecure AB, Org.no. 556527-2001 ("**AddSecure Group**") respects and safeguards your personal privacy. We want you to feel safe when we process your personal information. With this Privacy Policy ("**Privacy Policy**") we would like to show that your personal data is being handled in accordance with applicable legislation.

In order to provide our products and services to you as a user, we have to handle personal information about you. This Privacy Policy applies to our resellers or partners, customers or users of our services, people who wish to receive newsletters from us or who visit our websites.

AddSecure Group consists of companies listed at www.addsecure.com/about-us/data-protection/.

2 RESPONSIBILITY FOR PERSONAL DATA

AddSecure Group is the personal data controller for the use of your personal data and is responsible for ensuring that it is used in accordance with applicable legislation. You will find our contact information at the bottom of this Privacy Policy.

3 OUR USE OF YOUR PERSONAL DATA

We at AddSecure Group use your personal information in order to provide you with the products and services we offer in the best possible manner. We therefore use your personal data for the following purposes:

- Administration and the execution of contracts, and in order to preserve our legal interests
- Marketing, including customised direct mail
- Product, services and business development
- Administration in connection with company acquisitions, restructuring etc.
- Providing healthcare services (applies only for AddSecure Smart Care Oy)

This section applies to all companies within the AddSecure Group except AddSecure Smart Care Oy

We never knowingly collect sensitive personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or information relating to health or sexual orientation.

This section only applies to AddSecure Smart Care Oy

We never knowingly collect sensitive personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or sexual

orientation. Information related to health, information which is relevant to be able to provide health care, may be processed by AddSecure Smart Care Oy.

In addition, we never knowingly collect personal data from children under the age of 16. If you are a parent of a child under the age of 16 and you are made aware that your child has provided personal data to us, please contact us so that we can remove the information.

The following tables give more information on aspects such as why we use your personal data, what personal data we store and how long we retain your personal data.

<p>Purpose: Administration and fulfilment of contracts and in order to preserve our legal interests</p>		
<p>Personal data: <u>Customer data</u> such as customer number, name, address, telephone number and e-mail address. <u>Order and payment information</u> such as order history and other payment information. <u>Login details</u> such as email address and password. <u>Electronic log files</u> such as mobile data traffic or other data traffic sent to our alarm platforms and other systems.</p>		
<p>What we do: We use your information to provide, manage and personalise our products and services, and to enable you to log in to our web services and provide customer service to you as a user. In the event of a dispute, such as regarding payment, we are entitled to use your information for the purpose of determining, defending or making a legal claim.</p>	<p>Legal basis: <i>Fulfilment of contracts.</i> To be able to fulfil the contract. <i>Balance of interests.</i> In the event of a dispute, we are entitled to use your data with the support of a balance of interests.</p>	<p>Retention period: Your information will be saved for as long as we have a customer relationship with you and thereafter for 24 months. Our customer relationship with you applies during the term of the agreement when you are listed as a contact person or similar and for as long as you interact with us, for example by contacting us, visiting our website or clicking on links we have sent via e-mail over the last five years. The data is retained for a longer period of time if it is needed to comply with any legal requirements (such as mandatory accounting acts, other laws or regulations) and to determine, defend or make a legal claim such as a payment dispute.</p>
<p>Your rights: You have the right to object to such use of your personal information as we do with the support of a balance of interests. See section 9 for more information about your rights</p>		
<p>Information in this table applies to all companies within the AddSecure Group.</p>		

<p>Purpose: Marketing, including customised direct mail</p>		
<p>Personal data: <u>Customer data</u> such as customer number, name, address, telephone number and e-mail address. <u>Surfing habits and visiting history</u> such as the pages you visited on our website (and others) and how long the visit lasted.</p>		
<p>What we do:</p> <p>We use your personal data in the context of our marketing and market segmentation.</p> <p>By segmentation, we mean that we normally categorise our customer base based on the products you have purchased, the services you use, the interest you have shown in our published content and the role you have in the company.</p> <p>If you are not a customer but wish to take advantage of offers and information about new products and competitions, we need your consent.</p> <p>In order for consent to be valid, you are required to give such consent actively. Examples of active consent may be the confirmation of a subscription to a newsletter by checking a box on the web, filling in information in a web form, requesting information via email, answering yes to a direct question about sending you information, sharing a business card, or similar.</p>	<p>Legal basis:</p> <p><i>Balance of interest</i>, because we believe that our interest in sending general and segmented marketing to you takes into account your interest in the protection of your personal data.</p> <p><i>Consent</i>. If you are not yet a customer, we will obtain consent from you.</p>	<p>Retention period:</p> <p><i>For our customers:</i> Your information will be saved for as long as we have a customer relationship with you and thereafter for 24 months. Our customer relationship with you applies during the term of the agreement when you are listed as a contact person or similar and for as long as you interact with us, for example by contacting us, visiting our website or clicking on links we have sent via e-mail over the last five years. In any marketing communications you receive from us, you have the right to decline more marketing communications if you no longer wish to receive them.</p> <p><i>If you are not yet a customer of ours:</i> After you have given your consent, the data is retained until you choose to revoke your consent.</p>
<p>Your rights: You are always entitled to demand us to stop using your personal data for direct marketing purposes. You also always have the right to revoke your consent at any time in cases when we need your consent to use your personal data. If you revoke your consent, you will no longer be able to receive information and offers that are specifically tailored to you. See section 9 for more information about your rights</p>		
<p>Information in this table applies to all companies within the AddSecure Group</p>		

<p>Purpose: Product, services and business development</p>		
<p>Personal data: <u>Customer data</u> such as customer number, name, address, telephone number and e-mail address. <u>Order and payment information</u> such as order history and payment information. <u>Surfing habits and visiting history</u> such as the pages you visited on our website (and others) and how long the visit lasted. <u>Purchasing patterns</u> such as information on how you use our services <u>Electronic log files</u> such as mobile data traffic or other data traffic sent to our alarm platforms and other systems.</p>		
<p>What we do:</p> <p>We use your personal data in the context of our market and customer analyses, which consist mainly of statistics, data from completed market segmentations and customer satisfaction evaluations. We then use the results of our analysis as a basis to improve, replace or develop new services, processes or working methods in order to meet the expectations and wishes of you and other customers. For example, we may wish to use personal data to improve our customer service, offer new packages or customise our website to suit your needs and those of other customers.</p>	<p>Legal basis:</p> <p><i>Balance of Interest</i>, because we believe that our interest in analysing the use of our products and services in order to improve, replace or develop new ones takes into account your interest in the protection of your personal data.</p>	<p>Retention period:</p> <p>Your information will be saved for as long as we have a customer relationship with you and thereafter for 24 months. Our customer relationship with you applies during the term of the agreement when you are listed as a contact person or similar and for as long as you interact with us, for example by contacting us, visiting our website or clicking on links we have sent via e-mail over the last five years.</p>
<p>Your rights: You have the right to object to the use of your personal data when we use it as support in a balance of interest. If you object to such use, we will only continue to use the personal data if there are important reasons for such use which outweigh your interests. See section 9 for more information about your rights</p>		
<p>Information in this table applies to all companies within the AddSecure Group</p>		

<p>Purpose: Administration in connection with company acquisitions, restructuring etc.</p>		
<p>Personal data: <u>Customer data</u> such as customer number, name, address, telephone number and e-mail address. <u>Order and payment information</u> such as order history and payment information. <u>Login details</u> such as email address and password. <u>Surfing habits and visiting history</u> such as the pages you visited on our website (and others) and how long the visit lasted. <u>Purchasing patterns</u> such as information about how you use our services and about your purchasing patterns <u>Electronic log files</u> such as mobile data traffic or other data traffic sent to our alarm platforms and other systems.</p>		
<p>What we do: If the AddSecure Group is restructured, e.g. by being merged or divided into different entities, or if a third party wishes to acquire the AddSecure Group or our customer database, the AddSecure Group will disclose your personal data and that of other customers to the acquiring company. In such cases, the company will continue to use your personal data for the same purposes as those set out in this Privacy Policy if you do not receive any other information in connection with the transfer.</p>	<p>Legal basis: <i>Balance of Interest</i>, because we believe that our interest in enabling an acquisition or restructuring process takes into account your interest in the protection of your personal data. However, this assumes that the acquiring company performs similar activities to the AddSecure Group.</p>	<p>Retention period: If the AddSecure Group ceases to exist, e.g. through merger, liquidation or bankruptcy, or if the AddSecure Group's customer database is transferred to a company taking it over, we will delete your personal data provided we do not have to retain it to comply with legal requirements. If the AddSecure Group is acquired by a company or broken up in connection with restructuring, we will continue to retain and use your personal data in accordance with the terms of this Privacy Policy if you do not receive any other information in connection with the transfer.</p>
<p>Your rights: See section 9 for more information about your rights</p>		
<p>Information in this table applies to all companies withing AddSecure Group.</p>		

<p>Purpose: Providing healthcare.</p>		
<p>Personal data: <u>Information relevant to the healthcare of the patient</u> (who is the customer to AddSecure Smart Care Oy) such as narrative data, laboratory and research data, biometric and genetic data, as well as name and contact information of the customer's close relative. <u>Information necessary for treatment</u>, such as information prepared by a doctor, nurse, physiotherapist, psychologist etc.</p>		
<p>What we do: We use your information to provide relevant healthcare and necessary treatment. With the client's consent, information can be obtained from other health care units or professionals, for example through the Finnish Kanta Services.</p>	<p>Legal basis: <i>Fulfilment of contracts.</i> To be able to fulfil the contract.</p>	<p>Retention period: This information will be saved for as long as we have a customer relationship with you and thereafter for 24 months. Our customer relationship applies during the term of the agreement.</p>
<p>Your rights: See section 9 for more information about your rights</p>		
<p>Information in this table only applies to AddSecure Smart Care Oy</p>		

4 WHERE DOES YOUR PERSONAL DATA COME FROM

You have provided the personal data we use about you. You provide information such as your name, e-mail address and telephone number when registering a user account, ordering products and services and using our services.

In order to enter into an agreement with us at AddSecure Group and to provide you with our products and services, you are required to provide us with certain personal information. If you do not provide the information, we need to run our business, we cannot, unfortunately, enter into agreements with you or provide you with our products or services.

For an AddSecure Smart Care Oy customer, personal data might also be collected via the customer's close relative or a legal representative of the customer, or via nursing personnel and other health care professionals, or via any other relevant source to ensure AddSecure Smart Care Oy is providing relevant healthcare and necessary treatment.

5 AUTOMATED DECISION MAKING

We do not use automated processes to make decisions that significantly affect you.

6 HOW LONG DO WE RETAIN YOUR PERSONAL DATA FOR?

We will retain your personal data for as long as it is needed for the purposes for which we collected the data covered by this Privacy Policy. In the above tables under section 3 you can see for how long we retain personal data about you for different purposes.

We may also need to retain your personal data for other reasons, such as to comply with regulatory requirements or to monitor our legal interests or any other important public interest.

7 WHO DO WE DISCLOSE YOUR PERSONAL DATA TO?

The AddSecure Group may disclose your personal data to third parties, such as to other companies in the group as well as to IT providers, marketing agencies and companies we cooperate with to provide our services and conduct our business. In some cases, we may also have to disclose information at the request of the authorities or other parties in the context of court or business acquisition processes or similar.

8 WHERE DO WE USE YOUR PERSONAL DATA?

8.1 The AddSecure Group is committed to using your data only within the EU/EEA. In special cases, we may transfer your personal data to a country outside the EU/EEA. If personal data is transferred to such a country, we will ensure that your personal data remains protected and that the transfer occurs legally.

8.2 In the case of transfers to a non-EU/EEA country that does not ensure an adequate level of personal data protection, we use the EU Commission's standard contractual

clauses for the transfer of personal data to countries outside the EU/EEA. These can be found here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en.

- 8.3 In the case of transfers to recipients in the US covered by Privacy Shield, we use this as a basis for the transfer of your personal information. These can be found here: http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2016.207.01.0001.01.ENG&toc=OJ:L:2016:207:FULL.

9 YOUR RIGHTS

9.1 OUR RESPONSIBILITY FOR YOUR RIGHTS

9.1.1 The AddSecure Group is responsible, as personal data controller, for ensuring that the use of your personal data is in accordance with law and that your rights are taken into account. You can contact us at any time if you want to exercise your rights. You will find our contact details at the bottom of this Privacy Policy.

9.1.2 The AddSecure Group is required to reply to your request to exercise your rights within one month of your enquiry. If your request is complicated or if a large number of requests have been submitted, we are entitled to extend this period by two months. If we believe that we cannot do what you want us to do, we are obliged to notify you, within one month at the latest from the receipt of your request, why we cannot do what you want us to do and inform you that you have the right to complain to the supervisory authority.

9.1.3 All information, communications and all actions we carry out are free of charge to you. However, if what you request in respect of your rights is clearly unfounded or unreasonable, we are entitled to charge an administrative fee to provide you with the information or to carry out the requested actions, or to refuse to meet your request.

9.2 YOUR RIGHTS OF ACCESS, CORRECTION, DELETION AND LIMITATION

9.2.1 You have the right to request the following from the AddSecure Group

- a) Access to your personal data. This means that you have the right to request a summary of our use of your personal data. You also have the right to receive a copy of the personal data we use free of charge. For any additional copies, we are entitled to charge an administration fee.
- b) Correction of your personal data. At your request or on our own initiative, we will correct, anonymise, delete or supplement any information that we discover is inaccurate, incomplete or misleading. You also have the right to add further details if there is no relevant information.
- c) Deletion of your personal data. You have the right to request the deletion of your personal data if there is no longer an acceptable reason for us to use it. Deletion should therefore take place if:
 - (i) the personal data is no longer needed according to the purpose of its collection,

- (ii) we use your data on the basis of your consent and you revoke it,
- (iii) you object to our use of your data after a balance of interests and we do not have important interests that outweigh your interests and rights,
- (iv) we have used the personal data in an unlawful manner, or
- (v) we have a legal obligation to delete the personal data.

However, there may be legal requirements or other compelling reasons that permit us not to delete your personal data immediately. We will then stop using your personal data for purposes other than complying with legislation or for other compelling reasons.

- d) Limiting use. This means that we will temporarily restrict use of your data. You have the right to request a restriction when:
- (i) you believe that your information is incorrect and you have requested a correction under paragraph 9.2.1 b), while we are investigating the accuracy of the data,
 - (ii) the use of the data is illegal and you do not want the data to be deleted,
 - (iii) we as personal data controllers no longer need the personal data for our purposes, but you need them to be able to determine, enforce or defend a legal claim, or
 - (iv) you have objected to use of the data in accordance with point 9.3.1, while waiting for assessment of whether our interests outweigh yours.

9.2.2 We at the AddSecure Group will take all reasonable steps we can to notify anyone who has received personal data under section 7 above if we have corrected, deleted or restricted access to your personal data after you have requested us to do so. Upon your request, we will inform you of the parties we have disclosed personal data to.

9.3 YOUR RIGHT TO OBJECT TO DATA USE

9.3.1 You have the right to object to the use of your personal data on the basis of a balance of interests or of general interest (see section 3 above). If you object to such use, we will continue to use the data only if we have important reasons for such a continuation which outweigh your interests.

9.3.2 If you do not want the AddSecure Group to use your personal data for direct marketing purposes, you always have the right to object to such use by contacting us. Once we have received your objection, we will cease using your personal data for such marketing purposes.

9.4 YOUR RIGHT TO REVOKE CONSENT

In cases of data use where we use your consent as a legal basis (see section 3 above), you can revoke your consent at any time by contacting us. You will find our contact details at the bottom of this Privacy Policy. If you revoke your consent, it is possible that you will not be able to use our services as intended.

9.5 YOUR RIGHT TO DATA PORTABILITY

You have the right to data portability. This entails the right to obtain certain parts of your personal data in a structured, widely-used and machine-readable format and to transfer this data to another personal data controller. You are only entitled to data portability when the use of your personal data is automated and we base our use on your consent or on an agreement between you and us. This means that, for example, you have the right to obtain and transfer any personal data you have entered to create your user account with us.

9.6 YOUR RIGHT TO COMPLAIN TO THE SUPERVISORY AUTHORITY

You have the right to submit any complaints about our use of your personal data to the Data Protection Authority.

10 WE PROTECT YOUR PERSONAL DATA

You should always be able to feel safe when you provide us with your personal data. The AddSecure Group has therefore taken appropriate security measures to protect your personal data against improper access, alteration and deletion. If security incidents occur that may affect you or your personal data in a more significant way, such as when there is a risk of fraud or identity theft, we will let you know and tell you what you can do to reduce your risk.

11 CHANGES TO THIS PRIVACY POLICY

The AddSecure Group has the right to change this Privacy Policy at any time. If we make major changes, you will be given clear information about the changes and what they mean to you before they come into effect.

12 CONTACT INFORMATION

Please do not hesitate to contact us at AddSecure Group if you have any questions about this Privacy Policy, our use of your personal data or if you wish to exercise your rights.

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