



HARP TECHNOLOGIES CUSTOMER PRIVACY POLICY

This privacy policy has been issued on May 25, 2018.

1 Data Controller

Harp Technologies Ltd (Business ID 2123737-3) ("**Harp**")

Address: Tekniikantie 14, 02150 Espoo, Finland

Tel +358 50 3002625

2 Name and Purpose of the Register

The name of the register is Harp's Customer and Stakeholder Register ("**Register**"). The register and this privacy policy apply to persons ("**Person**") who represent Harp's customers, potential customers, or other stakeholders (such as authorities, governmental or inter-governmental organisations, and existing or potential subcontractors, service providers, vendors, or financiers) towards Harp.

3 Legal Basis and Purposes for Processing

The legal basis for the processing of the data in the Register is Art. 6 (1) (a) of the European General Data Protection Regulation (GDPR). Personal data can be applied by Harp and by companies belonging to the same company group with Harp within the boundaries set by law, including sales, marketing, invoicing, and recording of business transactions.

4 Contents of the Register and Categories of Personal Data

The register includes the following personal data, as applicable:

- a) name
- b) employer or host organization of the Person
- c) department
- d) work title
- e) military rank or academic salutation (Dr, Prof.)
- f) business related address
- g) email address
- h) phone number(s)
- i) fax number
- j) skype user name
- k) memorandum on business meetings and on other business contacts with Harp and other relevant business information, such as business leads and prospects



Personal data can include the information that the Person wishes not to receive Harp's newsletter. If Person's employment has terminated in the organisation in question, he/she can be defined as "retired" while maintaining the personal data in the Register. This is for the case that he/she has been involved in contracts and/or business transactions that require to store the personal data for a certain period of time (e.g., for the duration of the contract in question).

5 Sources of Data

The primary source of personal data (as defined above) stored in the Register is provided by the Person himself/herself to Harp, e.g., by email, through Harp's web page, by social media, by phone, during meetings, from contracts, and by other means or in other occasions. These data can be extended by publicly available information, including Internet, e.g., when the contact details of the Person have changed.

6 Transfer of Personal Data

Personal data may be transferred to the following parties:

- a) Harp's subcontractors in the field of ICT located in Finland, for the purposes of ICT and CRM administration
- b) Harp's subcontractors in the fields of sales and marketing, in Finland and elsewhere inside the European Economic Area and the European Union
- c) Harp's subcontractors in the field of ICT, for the purposes of spam identification, in the case that the Person sends personal data to Harp using the web page contact form,

Personal data will not be transferred to third parties (i.e., parties not belonging to the same company group with Harp) for the purposes of their own sales and marketing targeted on Person. With the exception listed above (spam identification), Harp does not transfer the personal data to countries outside the European Economic Area or the European Union unless instructed by the Person.

7 Profiling

Personal data is not used for profiling.

8 Security

The main part of the Register is located in a cloud service provided by a Finnish service provider and physically located in a data centre in Finland. The employees of Harp, the employees of the service provider, and any other persons have access to the Register on need to know basis only. The access requires a user account protected with a password. Accessing the Register and printing out reports and lists, etc. is registered the system in a log file. In addition to the above, limited amount of personal data (e.g., email addresses and



telephone numbers) are stored on Harp's own server computers, personal computers, laptops, and mobile devices. These are protected by firewall and anti-malware software, encryption software, mechanical and electric locks, and/or personal user accounts and passwords.

9 Right of Access

The Person has the right to get information on his/her personal data that is processed by Harp. Also, the Person has the right to get the information that no personal data is processed by Harp. An undersigned request to get this information shall be send to the Data Controller. This request can be made once a year free of charge. For additional requests, Harp may charge a reasonable processing fee based on administrative costs.

10 Right of Rectification of Data

Harp shall, at Person's request, correct, erase and/or supplement erroneous or unnecessary personal data in the Register, or erase all personal data of the Person. An undersigned request for rectification shall be send to the Data Controller.

11 Right to Make Complaint with Supervisory Authority

The Person has the right to make a complaint to the supervisory authority. The contact details are:

Office of the Data Protection Ombudsman

P.O. Box 800

00521 Helsinki

Finland

Tel: +358 29 56 66700

Email: tietosuoja@om.fi