

PRIVACY POLICY POINTR

Rev. January 21, 2021

This Privacy Policy describes how Delta Cygni Labs Oy ("DCL" or "we") processes personal data of those persons using ("User(s)" or "You") DCL's website and POINTR service (together "Service"). This Privacy Policy applies to your use of the Service and You should read this document before using the Service. In addition, use of the Service is subject to the DCL's Terms and Conditions.

DCL commits to adhere to the provisions of the European Union's General Data Protection Regulation and other applicable laws and regulations pertaining to processing of personal data, as well as to process personal data in compliance with good processing practices. All personnel processing personal data are obliged to keep such data strictly confidential.

"Personal data" refers to data, which allows a person to be directly or indirectly identified as an individual person, as defined in the General Data Protection Regulation. Information about the data subject that may not be identified, directly or indirectly, is not personal data.

Contact Information of Controller

Delta Cygni Labs Oy
Korkeakoulunkatu 1, 33720 Tampere, Finland
info@deltacygnilabs.com

Purpose and Legal Basis of Processing

Personal data is processed for the purposes of creating Service accounts, using, maintaining, customizing and developing the Service, contacting Users, user verification, sending user information, enabling communication in the Service. Legal basis of the processing is the agreement with You/ your employer related to providing the Service.

Personal data is also used to provide customer service and other services at your request, to send confirmations, technical notices, updates, security alerts, and support messages, and for conducting user research, creating reports and statistics, information security purposes, and to communicate with about other services offered by DCL. This processing related to management of users, ensuring the security of the Service and prevention of irregularities, customer service, creating statistics, communication and marketing is based on DCL's legitimate interest. Where we rely on the legitimate interest as a legal basis for the processing, it has been considered whether or not those interests are overridden by the rights and freedoms of data subjects.

We may process personal data also to comply with our legal obligations (such as accounting and tax law related) and based on your consent for example regarding cookies and direct marketing activities, as required by applicable laws.

Type of Data and Sources of Data

Depending on the part of Service, DCL collects several categories of data from You and/or your employer:

- Data You give to us, when signing up to use the Service such as your name, e-mail address, company name and mobile phone number.
- Technically gathered data when You use our Service, such as activity log, transient data streams, field notes, user-recorded still images and videos, and, upon separate user consent, user's address book / contacts for the purpose of establishing communication to those contacts.
- Data we receive from your employer regarding user rights, such as your name, email address, and mobile phone number.

We use technical means to collect data about You when You use our Service. This data may include your Internet Protocol ("IP") address, time of your requests or actions in the service, hardware identifiers, operating system and version, access times, location based on IP address, media access control ("MAC") address, international mobile equipment identity ("IMEI") and your device type and name.

Retention of Personal Data

The personal data we collect is retained for the period necessary to fulfil the purposes outlined in this the Terms

and Conditions of the Service, unless longer retention period is required by law, or DCL needs the data for drafting or presenting a claim or for a legal defence or for resolving a dispute of a similar nature.

Primarily, the personal data will be processed for the duration of the customer and contractual relationship and for a necessary time after the end of the customer and contractual relationship.

When personal data is no longer needed, it will be deleted within a reasonable time unless a longer retention period is required by law.

Recipients of Personal Data

DCL uses service providers or subcontractors to process personal information, to provide technical solutions or services for processing stored data and for accessing the stored data by using a technical interface and share your personal data with third party service providers to the extent that it is reasonably necessary to perform, improve or maintain the Service. We use third party service providers, such as e-mail, push notifications, SMS, SSO service providers, technical support applications, credit card / payment processors, data analyzers and business intelligence providers.

DCL will not disclose your stored personal data to third parties for direct marketing, market research, polls or public registers without your consent. Personal data may be used for targeted in-service marketing and other similar purposes, and to email marketing by DCL and selected third-parties.

DCL may disclose personal data to the employer of data subject for verification of the employer's commercial subscription. In exceptional circumstances personal data may be disclosed to third other parties if required under any applicable law or regulation or order by competent authorities, or to enforce the Terms of Service and to investigate possible infringing use of the Service as well as to guarantee the safety of the Service. If DCL is involved in a merger, or acquisition of all or a portion of our business, your personal data may also be required to disclose to third parties. Aggregate or anonymous data about You may be shared with advertisers, publishers, business partners, and other third parties.

Your personal data may be transferred outside the European Economic Area ("EEA") but only for enabling the communication, for example, transactional SMS and push notifications, transient cache within virtual private cloud. If we transfer your personal data to countries which are not a subject of adequacy decision of the EU Commission, we ensure an adequate level of data protection in accordance with data protection legislation such using standard data protection clauses approved by the EU Commission.

Cookies and other Tracking Technologies

A cookie is a string of data or a small text file that a website stores on a visitor's device, and that the visitor's browser or operating system provides to "remember" things about your visit. DCL may use cookies on its web sites to help it identify and track visitors, their usage of the Service, and their access preferences, improving quality, tailoring recommendations, and developing the Service. The cookies will not enable DCL to access and review data stored on a user's computer. In addition to cookies, DCL may use other existing or later developed tracking technologies. These tracking technologies may set, change, alter or modify settings or configurations on your device.

Users who do not wish to have cookies placed on their computers may set their devices to refuse cookies before using the Service, with the drawback that certain features of such service may not function properly without the aid of cookies. Please note that some parts of the Service may be country specific and may not work properly if we are unable to tell where You are accessing the Service from. We will ask your consent to the cookies used for other purposes than for communication and providing the Service.

DCL may work with third parties who use cookies and other tracking technologies to track the effectiveness of the advertisements that may be placed in the Service. They are used for analyzing advertisement view counts and are not linked to your personal data.

In order to improve the Service DCL may use tools from third party service providers to collect and use non-personal data. These services collect and store data such as time of visit, pages visited, time spent on each page of the Site, and the type of operating system used in the devices used to access.

Protection of Personal Data

We commit to follow to the security provisions of applicable data protection regulation(s), as well as to process personal data in compliance with good processing practices. Our personnel and processors that process personal

data are obliged to keep personal data strictly confidential. Access to personal data is only granted to those employees that need the information to perform their work tasks.

Personal data will be maintained in external service providers' servers with appropriate safeguards, such as password protection, granting the access to the stored data only to persons working at DCL or DCL partners who are expressly authorized by DCL. The registers are protected by appropriate industry standard, technical and organizational safety measures. DCL will provide notices in case material security breach that endangers personal data. DCL may also temporarily shut down a service to protect personal data.

Rights of Data Subjects

Right to access, verify and correct

Data subject has right to obtain a confirmation if his/ her personal data is processed and verify and access data regarding the said data subject and the purposes of processing. Data subjects have the right to verify and access personal data about himself/herself and to request DCL to receive the data in writing or electronically.

Data subject have also right to have corrected any incorrect, incomplete, outdated, or unnecessary personal data stored about the data subject by contacting us. DCL also removes, corrects and completes incorrect, unnecessary, incomplete or outdated data on its own initiative when it notices such data.

Right to object, restriction of processing and data portability

Data subject has the right to object processing personal data for certain purposes if such data are processed for other purposes than purposes necessary for the performance of our Services or for compliance with a legal obligation. The data subject has the right to forbid the disclosure and processing of its personal data for the purposes of such as direct marketing. If data subject objects or to the further processing of personal data, this may lead to fewer possibilities to use our Services. If You opt-out, DCL may still send You non-promotional customer data, such as emails about your account and providing the Service. You have also right to withdraw any consent given by you for the processing.

Data subject also has the right to request to restrict processing of personal data in accordance with the conditions set out in the data protection legislation and the right to receive personal data provided by Users from us in a structured, commonly used format.

Data subject has right to receive personal data which he or she has provided to us, in a structured, commonly used and machine-readable format. You have the right to transmit the data to another controller. You can also have the Personal Data transmitted directly to another controller, if technically feasible.

Right to erase

Data subjects may also ask us to delete the data subject's personal data from our systems. We will comply with such request unless we have a legitimate ground to not delete the data. After the data has been deleted, we may not immediately be able to delete all residual copies from our active servers and backup systems. Such copies shall be deleted as soon as reasonably possible.

How to use the rights

These rights may be used by sending a letter or e-mail to us on the addresses set out above, including the following data: name, company, phone number, and email address linked to the User account. We may request the provision of additional data necessary to confirm the identity of the data subject. We may reject requests that are unreasonably repetitive, excessive or manifestly unfounded or not based on the applicable data protection laws. Using your right in regard to the above-mentioned data disclosures, such as to your employer, you should contact any such party according their privacy notices.

In case data subject considers our processing activities of personal data to be inconsistent with the applicable data protection laws, a complaint may be lodged with the local supervisory authority for data protection.

Changes to the Privacy Policy

DCL may change this Privacy Policy from time to time. All changes hereto will be informed and made available on the Service or the DCL websites.