

## 1. General.

This privacy notice contains information about how Wiidare Ltd ("Wiidare" or "we") processes personal data of clients, potential clients and other stakeholders who communicate with us or attend events organized by us. We process personal data in accordance with this privacy notice and applicable legislation, including the General Data Protection Regulation (2016/679; "GDPR").

## 2. Data Controller.

The data controller of your personal data is:

Wiidare Ltd

Business Identity Code: 2983075-3

Address: Keilaranta 1, 02150 Espoo, Finland

E-mail: info@wiidare.com

## 3. What Personal Data Do We Collect.

We mainly process personal data we obtain directly from you in your role as a client, potential client, business partner or another stakeholder. You may provide us your personal data for example through emails or communication with us through other channels, such as our website, online forms, LinkedIn or over the phone. We may also in some cases obtain personal data from publicly available sources, such as public websites or social media platforms.

We mainly process the following types of personal data:

- basic information of you, such as your name, your contact information (e-mail, address, phone number(s), LinkedIn profile), your employer, your position and your role in your company;
- information you provide to us when participating in our events;
- if applicable, identification and background information provided by you or collected by us as part of our statutory compliance or business acceptance processes;
- personal data provided to us by our clients, business partners or other stakeholders;
- information you provide to us when giving feedback or answering client surveys;
- online information concerning your interaction with our website or advertisement on different platforms; and
- any other personal data relating to you which you may provide to us.

## 4. Purpose of Collecting Personal Data.

We collect and process personal data to:

- perform our services to clients and to maintain and develop our client relationships;
- develop our services to meet our clients' needs and preferences;
- communicate and engage with our clients and other stakeholders in relation to prospecting, client feedback surveys, our services, events and other similar engagements;

- purchase and source the services and products we need for managing our business and meeting our obligations;
- comply with our legal responsibilities, such as anti-money laundering and know your customer/supplier requirements; and
- enable electronic and direct marketing and target advertising in our online services.

## 5. Legal Basis for Processing Personal Data.

We process your data based on our legitimate interest in maintaining and developing the business relationship between us, based on our contract or otherwise. In specific cases, we may ask your consent before collecting and processing your personal information.

Certain processing of personal data is based on our legal obligations as a legal services provider, such as anti-money laundering related and other know your customer duties.

## 6. Cookies and Website.

Our website [www.wiidare.com](http://www.wiidare.com) uses cookies and other similar technologies for managing and developing the website, improving and analyzing the user experience and targeting advertisements in our services.

If you visit our website and the cookies have been enabled in your browser settings, we deem that you have consented to our use of cookies on our website.

By using cookies, Wiidare may collect information about:

- the website from which the user has arrived on our website;
- what pages the user is browsing and when;
- which web browser the user is using; and
- the IP address of the user's device.

We use the information collected by the cookies mainly for the following purposes:

### Necessary cookies

Cookies are essentially necessary for the proper functioning of our website and they enable a good user experience. These cookies do not collect information that would enable us to identify the user.

### Site Improvement Cookies

By following the use of these cookies, we can improve the functioning of our website and our user experience. We receive information about which parts of our website are popular and to which sites users leave from our website. We also receive information from where users arrive to our website and how long they stay on our website. All this information is valuable for us to develop our website and services.

### Social Media and Targeted Info

By using cookies, we can make the content of the website as individually customized as possible. We can make targeted ads and content based on the user's prior behavior, which enhances the user experience.

### Links

Our website may include links and connections to third-party websites, products and services as well as so

called community plug-ins of third parties (such as LinkedIn). The third-party plug-ins integrated into our website are loaded from third-party servers and thus the third party may install their own cookies on the user's device. These third-party services and applications offered on our website are subject to the privacy policies or notices of such third parties.

You can review the available cookie settings on your web browser. If you wish so, you can change the settings for the use of cookies by changing your web browser's settings to decline the storing of cookies on your device. In some cases, this may lead to slower browsing of websites or the access to some sites to be denied altogether.

The storage and retention period of the cookies varies by cookie type. The session cookies elapse when you close the web browser. Permanent cookies usually have a term of use, which varies from two months to a couple of years.

### **7. Data Processing and Third Parties.**

We both process personal data ourselves and use subcontractors (such as IT platform and services providers) that process personal data on behalf of and for us. Any third parties that process personal data on our behalf are obliged to process the data on a confidential basis for the abovementioned purposes only and always in accordance with applicable law.

In connection with some services, we may need to transfer personal data to other third parties, such as other counsels, advisors, and third parties involved in your matters. Such third parties may be based outside the European Union ("EU") and the European Economic Area ("EEA").

The personal data we process are not regularly transferred outside the EU or the EEA. However, if we transfer your personal data outside the EU or the EEA, such transfer will be performed subject to appropriate safeguards required by applicable data protection laws.

### **8. Security and Data Storage.**

We take appropriate technical and organizational measures against unauthorized or unlawful processing of your personal data and against accidental loss or destruction of, or damage to, your personal data.

All personal data is stored in databases protected by firewalls, passwords and other technical measures. Each user has a personal username and password to the systems where personal data are stored. Users are regularly trained and informed about security threats and the safe use of systems and tools.

We regularly check our security policies and procedures to ensure our systems are secure and protected. Only the personnel who need to process your personal data for the purposes mentioned above have access to your personal data.

### **9. How Long Will We Store Personal Data.**

Your personal data will be stored for the purposes mentioned above for as long as we have a meaningful

business contact or other contact or as may otherwise be required by law. More specifically, we store personal data in accordance with the following basic principles:

- we actively process your personal data while providing our services and managing the assignment to which your information is related; after the assignment, we archive the related personal data and may keep it in our archives for a period of ten years;
- with respect to our events and other non-assignment related communication, we may retain your information for three years from the most recent communication; and
- if you have subscribed to our electronic communication material, your contact data may be stored for this purpose until you unsubscribe from the communication.

We regularly review the personal data we control and take all reasonable actions to ensure that no incompatible, outdated or inaccurate personal data are stored with us.

### **10. Your Rights.**

You have the right to:

- request a copy of the personal data we process relating to you;
- request the correction of incorrect personal data relating to you and in some cases the deletion of your personal data;
- request the restriction of processing of your personal data or to object to processing;
- receive, under certain preconditions, your personal data in a structured, commonly used, and machine-readable format, and the right to transmit those data to another controller; and
- withdraw your consent.

In addition, you have an express right to ask us not to send you marketing-related communications.

All requests and inquiries in relation to your personal data must be addressed to Wiidare by using the contact details given above.

If you consider that your rights under the applicable data protection laws have been infringed, you may file a complaint with the Finnish Office of the Data Protection Ombudsman (Tietosuojavaltuutetun toimisto). The contact details of the Office of the Data Protection Ombudsman are available at <https://tietosuoja.fi/en/home>.

### **11. Updates.**

We may amend and update this privacy notice from time to time. We recommend that you review this privacy notice from time to time to ensure you are aware of any amendments and updates made. If the amendments are significant, we may also inform you about this for example by sending an email or placing a bulletin on our website at [www.wiidare.com](http://www.wiidare.com).