

## UTOPIA ANALYTICS - PRIVACY POLICY

Updated 31 May 2019

Utopia Analytics (“Utopia” or “we”) respects your privacy and aims to follow the applicable data protection legislation. We kindly ask you to carefully read this description regarding processing of your personal data (“Privacy Policy”). The purpose of this Privacy Policy is to fulfill our obligation to inform you as a data subject regarding our personal data processing practices and your rights as the data subject. We reserve the right to reasonably amend this Privacy Policy.

### 1. Contact information

Utopia Analytics Oy  
DPO  
Vilhonkatu 6 A  
FI-00100 Helsinki, Finland  
VAT CODE: FI26411588

### 2. In which roles do we process personal data?

We process your personal data both as a data controller and a data processor as further described in this Privacy Policy while providing our services in relation to artificial intelligence (AI), text analytics and machine learning.

### 3. What personal data do we process, for which purpose and in which role? What is our legal basis for processing?

We may process personal data as identified below together with purpose of processing, sources of the personal data and legal basis for processing the personal data in accordance with the applicable data protecting legislation considering our role either as the data controller or the data processor.

Type of personal data	Purpose of processing	Source of personal data	Utopia’s role	Legal basis for processing
<u>Customer’s contact data</u> such as company name, contact person, phone number, email address and position/role	Customer relationship management, business development, fulfilling contractual obligations with the Customer, invoicing, marketing of new services	Data subjects themselves, public registers, company websites, data may be also obtained in course of business	Data Controller	Legitimate interest (existing customer relationship, business development, marketing of new services and contractual obligations)  Customer has an option to decline marketing messages
<u>Potential customer’s contact data</u> such as company name, contact person, phone number, email address and position/role	Obtaining new customers, business development, marketing	Data subjects themselves, public registers, company websites, data may be also obtained in course of business	Data Controller	Legitimate interest (obtaining new customers, business development)  Potential customer has an option to decline marketing messages

<u>Customer data</u> such as text content of data moderated by Utopia, corresponding IP address, user name, name and email address	Providing our services and fulfilling contractual obligations with our client	Our customer	Data processor	Contractual relationship with our customer and a data processing agreement with our customer whereas our customer is the data controller
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#### 4. How long is personal data stored by us?

We store the personal data processed by us for the duration of the customer relationship between us and our customer and at maximum twelve (12) months after. However, we may store the personal data of customer's longer if the Finnish Accounting Act or other similar legislation so requires and removal of customer's contact data would cause of conflict with the requirements of legislation.

Potential customer's data will be reviewed and updated on yearly basis.

#### 5. Where is your personal data located?

We aim to store your personal data within the European Union and European Economic Area ("EU and EEA"). However, certain personal data due to systems and services used to support our business and providing our services may be transferred outside the area of EU and EEA including Australia and the United States. In such case we make sure that one of the following instruments applies: (a) the personal data remains located within a country recognized by the EU as providing an adequate level of protection for the personal data ("Adequacy Decision"), (b) standard contractual clauses or a similar instrument in accordance with the applicable data protection legislation exist in case of transfer, (c) binding corporate rules in accordance with applicable data protection legislation exist in case of transfer, or (d) EU-US Privacy Shield is in force.

#### 6. Who else may process your personal data?

Your personal data may be processed by our partners and subcontractors for the purposes of marketing, sales, accounting and invoicing as well as providing our services. In such cases we make sure that a data processing agreement exists between us and each of our partners or subcontractors together with one the instruments defined under Section 5 above when needed.

#### 7. Your rights as a data subject

As a data subject you have a right to access, request correction and request rectification or erasing the personal data concerning you. However, we may be entitled to decline erasing or deletion of personal data, if our legal obligations otherwise would be jeopardized.

In the event we are in position of the data processor (see the table in Section 3), we advise you contact your data controller, who is a provider of the service in which you have been registered.

If we are in the position of the data controller, please see the contact details under Section 1 and address us with a written letter by post. You may need provide a proof of your identification while we process your request.

As a data subject you are always entitled to contact the data protection authorities in case of complaints. Further information is provided at [www.tietosuoja.fi](http://www.tietosuoja.fi).