

## FIBRES™ Privacy Policy

BY ACCESSING AND/OR USING FIBRES™, YOU AGREE TO THE TERMS OF THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO ALL OF THE FOLLOWING TERMS AND CONDITIONS, PLEASE DISCONTINUE THE USE OF FIBRES™.

### 1 Introduction

- 1.1 This Privacy Policy ("**Privacy Policy**") applies to the use and collection of personal data at FIBRES™ ("**Service**") on [www.fibresonline.com](http://www.fibresonline.com) and [app.fibresonline.com](http://app.fibresonline.com). The Service is operated and provided by and the data controller and collector is Necorpoint Ltd (a limited liability company validly organized under the laws of Finland, business identity code 2365512-2, having its registered place of business at Fredrikinkatu 61 A 54, FI-00100 Helsinki, Finland) ("**Necorpoint**" or "**we**").
- 1.2 We value the privacy of our users ("**You**") and are committed to protecting Your personal data. We collect and use Your personal data in accordance with the relevant provisions of Finnish data protection legislation. This Privacy Policy describes the methods how Necorpoint collects and uses Your personal data, the options You have, and how You can inform us about Your choices.
- 1.3 If You have any questions or concerns about data protection, You are welcome to also contact us by email at: [support@fibresonline.com](mailto:support@fibresonline.com)

### 2 Use of Personal Data

- 2.1 The information submitted to the Service will be used for to manage and maintain the customer relationships between Necorpoint and You. The personal data is used to identify users of the Service and for the activation, execution, management and invoicing of the Service as well as for the providing of information and notifications to the users of the Service. Additionally, Your personal data may be used for investigation and follow up in cases of misuse.
- 2.2 Personal data may also be used for the planning and development of Necorpoint's business and services and to measure the amount of users using the Service. In addition Necorpoint may use and disclose personal data for justifiable purposes (such as direct marketing, distance selling, other direct advertising, opinion polls or marketing research) in accordance with the applicable personal data legislation.
- 2.3 We collect personal data connected to the use of the Service. The data that we collect includes Your email, name, possible credit card information, and the generated passwords. In addition, in order to improve the Service, we collect extensive usage data of what happens in the system. This includes, but is not limited to, for example, when users log in, create or import content, modify or delete them, et cetera. We also collect information about the users' IP addresses, operating system and the browser used.
- 2.4 Data collection regarding Your IP address, operating system and browser starts when You go to the FIBRES™ website. Necorpoint starts collecting personal data when You register to the Service, or Your account is created, or Your information is otherwise submitted in the system, and continues to do so during Your use of the Service.
- 2.5 When You send email or other communications to Necorpoint, we may retain those communications in order to process Your inquiries, respond to Your requests and improve our services. We may use Your email address and other contact information to communicate with You about our Services.

### **3 Regular Sources of Information**

- 3.1 The personal data is acquired from You when You use the Service or when You contact Necorpoint via email or by another equivalent means of communication regarding the Service. Furthermore, Your personal data may be acquired from another user of the Service belonging to the same or another organization as You, when creating Your access to the Service.

### **4 Disclosures of Personal Data**

- 4.1 Necorpoint is entitled to use subcontractors in connection with the provision and development of the Service. For this reason Your personal data may be transferred to contractors to the extent that this is necessary for the fulfillment of the services, including but not limited to the storage of data on a server maintained by a third party on assignment by Necorpoint and to a contractor processing credit card payments.
- 4.2 Necorpoint may share Your information with third parties under the following circumstances: a) We have Your explicit consent to share the information; b) We have a good faith belief that sharing or otherwise permitting access, disclosure, use or preservation of such information is necessary in order to comply with our legal obligations; or c) We believe it is necessary in order to investigate, prevent or take action regarding illegal activities, suspected fraud or potential threats against persons or property.

### **5 Use of Cookies**

- 5.1 By using the Service You expressly consent to Necorpoint using and installing cookies to Your computer or other device via Your browser. Necorpoint uses cookies to identify You when You visit and use the Service. In case You do not want to allow cookies to be installed on Your browser, You may be able to modify Your browser setting in order to turn off the cookies. However, by turning off cookies may result in parts of the Service not working as intended.
- 5.2 In particular, Necorpoint may use Google Analytics, a web analysis service of Google Inc. ("Google"). Google Analytics also uses cookies, enabling analysis of Your use of FIBRES™. The information may be transmitted to a Google server in the USA and stored there. Google will use this information to assess Your use of FIBRES™, to compile reports on the activities for us and to provide more services connected with use of FIBRES™ and the internet. It is also possible that Google may transmit this information to third parties if this is prescribed by law or if third parties process this information on behalf of Google.

### **6 Correctness of Data and Data Retention**

- 6.1 Necorpoint does not verify the correctness of the personal data. If You detect an error regarding Your personal data You can correct the information in the Service or contact Necorpoint by sending an email to [support@necorpoint.com](mailto:support@necorpoint.com). The data relating to the use of the Service is removed when its storage is no longer necessary for the purpose it was originally collected.
- 6.2 The personal data collected by Necorpoint is retained on servers, the information security of which is protected in accordance with the applicable law and general market practice. We restrict access to personal information to Necorpoint employees, contractors and agents who need to know that information in order to process it on our behalf. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

## **7 Links to Third Party Sites**

- 7.1 The Service may contain links to third party websites. The linked websites are not under the control of Necorpoint and Necorpoint is not responsible for any content on such third party websites or the links that they may contain.

## **8 Amendments**

- 8.1 Necorpoint reserves the right to reasonably amend this Privacy Policy so please review it frequently. Your continued use of the Service shall be deemed as Your acceptance of the amendments.