

FIBRES Privacy Policy

FIBRES (“**FIBRES**”, “**we**”) might collect and process personal data of users of FIBRES’ website and online services. This Privacy Policy applies to personal data we collect from individuals (“**Users**”) through our websites, online services, and web-based applications (collectively, the “**Services**”) as well as to personal data included in FIBRES’ customer and marketing registers.

Our Privacy Policy explains what data we process, how we do that and how the data subjects, i.e. Users, may use their rights (e.g. right to object, right of access).

This Privacy Policy constitutes a description of the data file as set out in the Finnish Personal Data Act (Sections 10 and 24).

This Privacy Policy may be updated if required in order to reflect the changes in data processing practices or otherwise. The current version can be found on our website at www.fibresonline.com. We will not make substantial changes to this Privacy Policy or reduce the rights of Users under this Privacy Policy without providing a notice thereof.

This Privacy Policy only covers data processing carried out by FIBRES when and to the extent FIBRES is the controller of the personal data under applicable data protection laws. The Privacy Policy does not address, and we are not responsible for, the privacy practices of any third parties. FIBRES disclaims all responsibility for the processing carried out by third parties, also in cases where Services include hyperlinks to third parties’ websites. Please note that personal data inserted into FIBRES service in connection with the customer’s use of the FIBRES service is collected by the customer and FIBRES has no control over the data, and therefore processes such personal data on behalf of the customer as a data processor. In this case, the relevant customer shall be considered to be data controller for said personal data and these processing activities are subject to customer’s privacy policy.

Privacy, security and online safety are important for us, and we process all personal data with due care and in accordance with applicable laws and regulations.

1 FIBRES’ Contact Details

Name: Necorpoint Ltd
Company ID in Finnish trade register: 2365512-2
Correspondence address: Fredrikinkatu 61 A 54, 00100 Helsinki, Finland
E-mail address: support@fibresonline.com
www.fibresonline.com

2 Personal Data Processed and Sources of Data

We collect two types of information from the Users: (i) User Data; and (ii) Technical Data. Although we do not normally use Technical Data to identify individuals, sometimes individuals can be recognized from it, either alone or when combined or linked with User Data. In such situations, Technical Data can also be considered to be personal data under applicable laws and we will treat the combined data as personal data.

FIBRES may collect and process for example the following User Data from Users: (i) first and last name; (ii) address details, (iii) telephone number, (iv) e-mail address, (v) information that Users provide when rating our Services or giving feedback on our Services; (vi) other personal data Users provide themselves.

The specific kind of User Data collected will depend on the Services used. User Data is received directly from Users.

Technical Data may include for example the following data (i) User's IP address; (ii) browser type and version; (iii) preferred language; (iv) geographic location using IP address or the GPS, wireless, or Bluetooth technology on your device; (v) operating system and computer platform; (vi) the full Uniform Resource Locator (URL) clickstream to, through, and from our Services, including date and time; (vii) products or services User viewed or searched for while using our Services; and (viii) areas of our Services User has visited.

Cookies

We use various technologies to collect and store Technical Data and other information when Users visit our Services, including cookies. Cookies allow us to calculate the aggregate number of people visiting our Services and monitor the use of the Services. This helps us to improve our Services and better serve our Users. We may also use cookies that make the use of the Services easier, for example by remembering usernames, passwords and preferences. We may use tracking and analytics cookies to see how well our Services are being received by our Users. Users may choose to set their web browser to refuse cookies, or to alert when cookies are being sent. This can usually be done through Internet browser's settings. Information about how to manage cookies can be found online. For example, the following links provide information on how to adjust the cookie settings on some popular browsers:

[Safari](#)
[Google Chrome](#)
[Internet Explorer](#)
[Mozilla Firefox](#)

Please note that some parts of our Services may not function properly if use of cookies is refused.

Google Analytics

Our Services use Google Analytics and other web analytics services to compile Technical Data and reports on visitor usage and to help us improve our Services. For an overview of Google Analytics, please visit [Google Analytics](#). It is possible to opt-out of Google Analytics with the following browser add-on tool: [Google Analytics opt-out add-on](#).

3 Purposes for Processing of Personal Data

There are several purposes for the processing of personal data by FIBRES:

To provide our Services and carry out our contractual obligations

We process personal data in the first place to be able to offer the Services to Users and to run, maintain and develop our business. In some cases, personal data may be processed in order to carry out our contractual obligations towards the User. We may use the data for example to offer essential functionalities of the Services and to provide access to the Services. If User contacts our customer service, we will use the provided information for answering questions and solving possible issues.

For customer communication

We may process personal data for the purpose of contacting Users regarding our Services and to inform Users of changes in our Services. Data may also be used for research and analysis purposes in order to improve our Services.

For quality improvement and trend analysis

We may process information regarding the use of the Services to improve the quality of our Services e.g. by analysing any trends in the use of our Services. When possible, we will do this using only aggregated, non-personally identifiable data.

4 Legitimate Grounds for Processing of Personal Data

We process personal data to perform our contractual obligations towards Users and to comply with legal obligations. Furthermore, we process personal data to pursue our legitimate interest to run, maintain and develop our business.

In some parts of the Services, Users may be requested to grant their consent for the processing of personal data. In this event, Users may withdraw their consent at any time.

5 Transfer to Countries Outside Europe

We have operations, entities, and service providers in several geographical locations. As such, we and our service providers may transfer personal data to, or access it in, jurisdictions outside the European Economic Area or the User's domicile. We will take steps to ensure that Users' personal data receives an adequate level of protection in the jurisdictions in which we process it. We provide adequate protection for the transfer of personal data to countries outside of the European Economic Area through a series of intercompany agreements and agreements with our service providers based on the Standard Contractual Clauses or other similar arrangements. More information regarding the transfers of personal data may be obtained by contacting us on addresses mentioned in this Privacy Policy.

6 Recipients

We only share personal data within the organisation of FIBRES if and as far as reasonably necessary to perform and develop our Services.

We do not share personal data with third parties outside of FIBRES' organization unless one of the following circumstances applies:

It is necessary for the purposes set out in this Privacy Policy

To the extent that third parties need access to personal data to perform the Services, FIBRES has taken appropriate contractual and organisational measures to ensure that personal data are processed exclusively for the purposes specified in this Privacy Policy and in accordance with all applicable laws and regulations.

For legal reasons

We may share personal data with third parties outside FIBRES' organization if we have a good-faith belief that access to and use of the personal data is reasonably necessary to: (i) meet any

applicable law, regulation, and/or court order; (ii) detect, prevent, or otherwise address fraud, security or technical issues; and/or (iii) protect the interests, properties or safety of FIBRES, our Users or the public in accordance with the law. When possible, we will inform Users about such transfer and processing.

To authorized service providers

We may share personal data to authorized service providers who perform services for us (including data storage, sales, marketing and customer support services). Our agreements with our service providers include commitments that the service providers agree to limit their use of personal data and to comply with privacy and security standards at least as stringent as the terms of this Privacy Policy. Please bear in mind that if you provide personal data directly to a third party, such as through a link on our website, the processing is typically based on their policies and standards.

For other legitimate reasons

If FIBRES is involved in a merger, acquisition or asset sale, we may transfer personal data to the third party involved. However, we will continue to ensure the confidentiality of all personal data. We will give notice to all Users concerned when the personal data are transferred or become subject to a different Privacy Policy as soon as reasonably possible.

With explicit consent

We may share personal data with third parties outside FIBRES' organization for other reasons than the ones mentioned before, when we have the User's explicit consent to do so. The User has the right to withdraw this consent at all times.

7 Storage Period

FIBRES does not store personal data longer than is legally permitted and necessary for the purposes of providing the Services or the relevant parts thereof. The storage period depends on the nature of the information and the purposes of processing. The maximum period may therefore vary per use.

Typically, we will store User's personal data for as long as the User is a registered subscriber or a registered user of our Services or for as long as we have another purpose to do so and, thereafter, for no longer than is required or permitted by law or reasonably necessary for internal reporting and reconciliation purposes.

In general, personal data of Users are deleted within reasonable time after the User no longer uses any part of the Services or when the User makes a request regarding deletion of User's personal data.

8 Users' Rights

Right to access

FIBRES offers access for the Users to the personal data processed by FIBRES. This means that Users may contact us and we will inform what personal data we have collected and processed regarding the said User and the purposes such data are used for.

Right to withdraw consent

In case the processing is based on a consent granted by User, User may withdraw the consent at any time. Withdrawing a consent may lead to fewer possibilities to use our Services.

Right to correct

Users have the right to have incorrect, imprecise, incomplete, outdated, or unnecessary personal data we have stored about the User corrected or completed.

Right to deletion

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

Right to object

Users may object to certain use of personal data if such data are processed for other purposes than purposes necessary for the performance of our Services to the User or for compliance with a legal obligation.

Users may also object any further processing of personal data after prior given consent. If User objects the further processing of personal data, this may lead to fewer possibilities to use our Services.

Notwithstanding any consent granted beforehand for the purposes of direct marketing, User has the right to prohibit us from using User's personal data for direct marketing purposes, market research and profiling by contacting us on the addresses indicated above or by using the functionalities of the Services or the unsubscribe possibility offered in connection with any direct marketing messages.

Right to restriction of processing

Users may request us to restrict certain processing of personal data; this may however lead to fewer possibilities to use our Services.

Right to data portability

Users have the right to receive their personal data from us in a structured and commonly used format and to independently transmit those data to a third party.

How to use the rights

The above mentioned rights may be used by sending a letter or an e-mail to us on the addresses set out above, including the following information: name, address, phone number and a copy of a valid ID. We may request the provision of additional information necessary to confirm the identity of the User. We may reject requests that are unreasonably repetitive, excessive or manifestly unfounded.

9 Lodging a Complaint

In case User considers our processing 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.

10 Information Security

We will take all reasonable and appropriate security measures to protect the personal data we store and process from unauthorised access or unauthorised alteration, disclosure or destruction. Measures include for example, where appropriate, encryption, firewalls, secure facilities and access right systems.

We use administrative, organizational, technical, and physical safeguards to protect the personal data we collect and process. Our security controls are designed to maintain an appropriate level of data confidentiality, integrity, and availability. We regularly test our websites, data centres, systems, and other assets for security vulnerabilities.

Should despite of the security measures, a security breach occur that is likely to have negative effects to the privacy of Users, we will inform the relevant Users and other affected parties, as well as relevant authorities when required by applicable data protection laws, about the breach as soon as reasonably possible.