

## Privacy Policy

Code Partners Nordic Oy (also referred to later as “COPA”) collects, stores, and uses personal information as a data controller in connection with and in order to provide and develop its products, mobile applications, services and websites (together “Services”) according to this Privacy Policy. COPA acts as a data controller in accordance with the general data protection regulation (“GDPR”) when processing personal data. This Privacy Policy is governed by Finnish law excluding its choice of law provisions.

All COPA Services are governed by this Privacy Policy. In order to use or access a Service partly or completely, your freely given consent or entering into a separate user agreement contract may be requested for the processing of your data in accordance with this Privacy Policy or the Service specific Privacy Policy. Please do not install or use the Services if you do not agree to this Privacy Policy.

COPA reserves the right to modify this Privacy Policy. Your continued use of Services will signify your acceptance of the changes to this Privacy Policy, provided that acceptance of the changes made does not require any separate action on your part, such as freely given consent for one or more specific data processing purposes.

## Purpose of This Document

This document is intended to act both as COPA’s general data protection policy and as an implementation of information practices visible to all data subjects, in order to ensure transparency in the processing of personal data and how COPA processes and does not process the data.

**You can read through this document by reading bolded sections to learn about the data processed, the basis of processing, and the specific processing purposes. The basis of processing is notated as a letter a-f and the specific processing purpose is notated as a number 1-12.**

## Privacy Policies Specific to Services

COPA produces and maintains a wide range of Services. There are remarkable differences in the ways the data is collected, stored and shared depending on the Service. Some Services do not collect, store and share any data at all while some Services collect and share most of the data in order to offer as user friendly service as possible. Each Service typically includes more detailed information about the data collection, storing and sharing policies specific to the Service.

Privacy Policies specific to Services are usually available and can be found in the Services. Privacy Policies specific to Services will apply primarily and this Privacy Policy will apply secondarily. If the Privacy Policy specific to the Service is not available, then this Privacy Policy will apply.

## Data Processing

At COPA, personal data is processed only by COPA's employees or subcontractors who have signed a separate non-disclosure agreement. Access to personal data is restricted to specific employees, subcontractors and Services, and is protected by modern technologies, accounts and passwords. COPA may use other service providers who act on behalf of COPA as processors of personal data to provide the Services. For more information on the personal data processors acting on behalf of COPA, see the Privacy Policies specific to the Services.

**COPA may use the data for the following specific processing purposes:**

1. enable the use of Services partly or completely
2. operate and improve Services
3. control, monitor and prevent misuse of Services
4. marketing and advertising the Services
5. understand the user preferences and behavior to enhance user experience and enjoyment using the Services
6. customer service and helpdesk
7. delivery of direct marketing, newsletters or other communications
8. business development and improvement including research and product development
9. enable the exercise of the rights of the data subject
10. resolve disputes
11. enforce COPA user agreements
12. comply with technical and legal requirements and constraints related to the security, integrity and operation of Services.

**COPA processes the personal data only when at least one of the following legal basis for processing applies:**

- a. **Consent:** a person or a user has given consent to the processing of his or her personal data for one or more specific processing purposes.

- b. **Performance of a contract:** Processing is necessary for the performance of a contract to which the person or the user is party or in order to take steps at the request of the person or the user prior to entering into a contract.
- c. **Legal obligation:** processing is necessary for compliance with a legal obligation to which COPA is subject.
- d. **Protection of vital interests:** processing is necessary in order to protect the vital interests of the person or the user or of another natural person.
- e. **Public interest or official authority:** processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in COPA.
- f. **Legitimate interest:** processing is necessary for the purposes of the legitimate interests pursued by COPA or by a third-party.

**Likely situations when a person or a user makes personal data available to COPA include, but are not limited to:**

- using COPA Services
- installing COPA Services
- registering for COPA Services
- visiting COPA Services
- accessing COPA Services
- giving information to COPA inside or outside of COPA Services.

**During the use of any of COPA applications and Services, commonly the following data may be processed:**

- unique device ID
- hardware type
- the version of operating system
- **location information**
- **E-mail address**
- **IP address.**

If the precise **geo-location information** is processed, it is processed only with the user's freely given **(a.) consent** for the specific processing purpose to **(1.) enable the use of Services partly or completely**. Notwithstanding COPA's partners who are providing location related parts of the Service, COPA will not share geo-location information of a user with third parties without the user's freely given **(a.) consent**. To the extent COPA makes available geo-location information to third parties in accordance with this Privacy Policy, it will be provided anonymously.

If the **E-mail address** is processed, it may be processed with the user's freely given **(a.) consent** to **(1.) enable the use of Services partly or completely, (6.) customer service and helpdesk**, and with a separate freely given **(a.) consent** to **(7.) delivery of direct marketing, newsletters or other communications**. Additionally, the basis of processing may be **(b.) performance of a contract**, where the E-mail address may be processed to **(11.) enforce COPA user agreements**, and to **(3.) control, monitor and prevent misuse of Services**. The basis for processing may also be **(c.) legal obligation**, where the E-mail address is processed to **(9.) enable the exercise of the rights of the data subject**.

The **IP address** of the user or a visitor to the Service may be processed on the basis of **(f.) legitimate interest to (2.) operate and improve Services, (3.) control, monitor and prevent misuse of Services**, and on the basis of **(c.) legal obligation to (12.) comply with technical and legal requirements and constraints related to the security, integrity and operation of Services**. If the sharing of the IP address with third parties is necessary for **(f.) legitimate interest** in accordance with this Privacy Policy, it will be processed only as anonymized.

**The information (together "Customer Data") provided by a person or a user to COPA may include, but is not limited to:**

- **name**
- **E-mail address**
- **phone number**
- **address information**
- free form message or attachment.

COPA processes and uses Customer Data for **(6.) customer service and helpdesk** processing purposes, such as responding to a contact request, inquiry, question or other free form message submitted by a customer based on **(f.) legitimate interest** to serve the customer. In some Services, a user may also have the option, when providing Customer Data, to provide separate freely given **(a.) consent** for other specific processing purposes, such as **(7.) delivery of direct marketing, newsletters or other communications**.

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**Following statistical data (together “Statistical Data”) may be collected and stored during the use of any of the Services includes, but are not limited to:**

- amount of visitors or users in a Service
- age group distributions of the users of a Service
- sex distributions of the users of a Service
- generally categorized interests of the users of a Service
- countries or areas from where a Service is accessed
- new and regular user distribution of a Service
- web addresses from where a Service is accessed
- most popular pages or views in a Service
- browser versions a Service is used on
- devices a Service is used on
- time spent on the Services.

COPA processes **Statistical Data** on the basis of **(f.) legitimate interest** for the processing purposes to **(5.) understand the user preferences and behavior to enhance user experience and enjoyment using the Services**, and **(8.) business development and improvement including research and product development**. The processing of Statistical Data on the basis of **(f.) legitimate interest** is always carried out in such a way that no individual person or user of the Service can be identified from it at any time after the person or user has accessed the Service.

**Statistical Data** will not be combined with any other data collected without the freely given **(a.) consent** of the individual or user for a specific processing purpose. Otherwise, if the data is deemed to belong to an entity or a company, Customer Data

may be combined with some Statistical Data based on COPA's **(f.) legitimate interest** in processing the data for the purposes of **(4.) marketing and advertising of the Services**, and **(7.) delivery of direct marketing, newsletters or other communications**.

**Statistical Data** will not be processed in such a way that the use of the Service by an individual user can be monitored or an individual user of the Service can be identified. COPA does not execute automated individual decision-making towards the users of a Service or other automated individual decision-making based on collected Statistical Data without the freely given **(a.) consent** of the person or user for a specific processing purpose.

## Transmittable Data

**When using COPA's Services, the following data (together "Transmittable Data") may be transmitted to parties who provide services for COPA:**

- **IP address.**

COPA may transmit Transmittable Data to parties that provide COPA with, among other things, analytics, business analytics and business-to-business marketing services and tools (together "Analytics and Marketing Tools"). The parties to whom the Transmittable Data is transmitted are deemed to have implemented an adequate level of data protection in compliance with the GDPR when processing Transmittable Data and providing the Analytics and Marketing Tools.

**Transmittable Data** will only be transmitted and processed in anonymized form on the basis of **(f.) legitimate interest**, or without anonymized form on the basis of freely



given **(a.) consent** of a person or a user for a specific processing purpose. If Transmittable Data is not considered to be personally identifiable information in cases when the IP address is owned by an entity or a company, then Transmittable Data is transmitted and processed on the basis of **(f.) legitimate interest**. For example, information on whether an IP address is owned by an entity or a company can be obtained through reverse DNS lookups or other publicly available information or from specific databases. Transmittable Data of individuals will not be processed without anonymization or without the freely given **(a.) consent** of the user of the Service for a specific processing purpose.

COPA may, based on **(f.) legitimate interest**, process the personal and contact information available from the Analytics and Marketing Tools of persons in key decision-making positions in companies or other contact persons who were visiting the Services, as well as their business related social media public information. Analytics and Marketing Tools that provide business-to-business marketing services and tools do not make use of Transmittable Data of Individuals by making available the personal or contact information of individuals.

**COPA may transmit Transmittable Data to the following parties and services:**

- **Leadfeeder**

- Business-to-business Analytics and Marketing Tools, where part of the data to be processed is based on Transmittable Data belonging to the entity or company, for example information about the countries or continents from which the Service is used or visited.
- Transmittable Data will only be processed in anonymized form.

- You can read how Leadfeeder processes IP addresses [here](#).
- **Google Analytics**
  - Analytics and Marketing Tools, where part of the data to be processed is based on Transmittable Data belonging to the users or visitors of the Service, such as information about the countries or continents from which the Service is used or visited.
  - Transmittable Data will only be processed in anonymized form.
  - You can read how IP address anonymization works in Google Analytics [here](#).
  - The possibility to prevent the data from being sent to Google by using [a browser add-on that prevents the use of Google Analytics](#).

COPA only transmits **Transmittable Data** in order to enable the use of the Analytics and Marketing Tools for the processing purposes of **(5.) understanding the user preferences and behavior to enhance user experience and enjoyment using the Services, (4.) marketing and advertising the Services, and (8.) business development and improvement including research and product development.**

## Data Retention and Correctness

COPA does not verify the correctness of personal data. Content data and information, such as event time schedules, answers to puzzles and crowd-sourced environmental information, related to COPA's Services is often generated and produced by third parties. COPA does not verify the correctness of the content data. COPA does not accept any responsibility or liability for the accuracy, content, completeness, legality, or reliability of the information contained on, or provided by the Services.

COPA retains the collected data for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law. Thereafter COPA deletes all aforementioned data in its possession within a reasonable timeframe. Please note that some data may be further retained and processed if necessary to **(10.) resolve disputes** where the basis for processing is **(c.) legal obligation** or **(f.) legitimate interest, (11.) enforce COPA user agreements** where the basis for processing is **(b.) performance of a contract**, and **(12.) comply with technical and legal requirements and constraints related to the security, integrity and operation of Services** where the basis for processing is **(c.) legal obligation**.

Cookies are stored on the user's device for up to 2 years after the last visit to the service. Statistical Data will be retained for up to 50 months from the last time an individual person or the user used or visited the Service. After this, the data of the user is automatically deleted from the Statistical Data of the Service.

## Disclosure and Transfer of the Data

COPA may disclose the data to third parties including third parties in accordance with applicable legislation and this Privacy Policy. COPA is not liable for the acts and omissions of these third parties, except as provided by mandatory law. COPA may disclose personal data to third parties in connection with a corporate merger, consolidation, restructuring, the sale of substantially all of COPA's stock and/or assets or other corporate change, including, without limitation, during the course of any due diligence process provided, however, that this Privacy Policy shall continue to govern such personal data.

The data may be transferred outside the European Union or the European Economic Area to third countries if the personal data processor acting on behalf of COPA or a subcontractor of the personal data processor processes the data in third countries. In these cases, the processor acting on behalf of COPA has also committed to comply with the GDPR and is deemed to implement an adequate level of data protection, or is bound by a contract to process personal data on behalf of COPA in accordance with the standard contractual clauses.

## Data Subject Rights

### As a data subject you have the right:

- to obtain information on the processing of your personal data
- of access to your data
- to rectification of your data
- to the erasure of your data and to be forgotten
- to restrict the processing of your data
- to data portability
- to object to the processing of your data
- not to be subject to a decision based solely on automated processing.

You can read more about your rights from the web page of the office of the data protection ombudsman by following this [link](#).

COPA makes good faith efforts to enable the review, update or correction of personal data in COPA's possession. COPA will need sufficient information to establish identity

and to verify access requests, and also to assist COPA in handling the request. Data review, update and correct enquiry is free of charge once a year.

The data obtained in connection with the exercise of the rights of the data subject is processed to **(9.) enable the exercise of the rights of the data subject**, where the processing is based on **(c.) legal obligation**.

## Safeguards

COPA follows generally accepted industry standards and maintains reasonable safeguards to attempt to ensure the security, integrity and privacy of the information.

## Contact

If you have any questions about Privacy Policy, or enquiries related to exercising data subject rights, or other enquiries about COPA's data protection, please contact us via E-mail: [info@copa.fi](mailto:info@copa.fi), or contacting directly to the named Data Protection Officer whose contact information you may find by navigating in our web page [www.copa.fi](http://www.copa.fi), send us mail to: COPA, Jääkärintie 33, 50130 Mikkeli or visit our headquarters at the mentioned address.