

PRIVACY POLICY

TUXERA STORAGE AND NETWORKING SOFTWARE NEWS

This document outlines the principles applicable to the processing of personal data in relation to the Tuxera Storage and Networking Software News newsletter. Should you have any questions regarding the contents, please contact the responsible person indicated below.

1 Data controller	Tuxera Inc. (business ID: 2215511-8) Westendintie 1, FI-02160 Espoo, Finland
2 Responsible person	Jussi Honkasalo, Legal Counsel Email: privacy@tuxera.com
3 Purpose	Processing is undertaken to enable Tuxera to send out communications about our products and services, activities, and relevant market events to customers, prospects, and other interested parties.
4 Legal basis	Processing is based on the specific consent given by the recipient or, in the case of contact persons at our customers or prospects, our legitimate interest to send updates about our products and services, activities, and relevant market events to our stakeholders.
5 Collected data	The register contains the following categories of data relating to the mailing list recipients: <ul style="list-style-type: none">(a) their name (if available) and email address,(b) the name of the company they represent or work for (if available),(c) their activity rating and related analytics data measuring recipient engagement with our communications, and(d) their subscription status.
6 Data sources	Data is collected either directly from the recipient (e.g. they submit data through an online form) or, in the case of

	<p>existing contacts at Tuxera customers or prospects, from Tuxera's customer and prospect register.</p> <p>Analytics data about recipient engagement is collected by our service provider using so-called beacons embedded in communications that are sent out to the mailing list.</p>
7 Data recipients	<p>Data is not regularly made available to other third parties besides service providers who process data based on their engagement with Tuxera.</p> <p>We may also disclose data where so required or permitted by law or a lawful request from governmental authorities.</p>
8 Data transfers	<p>Data is regularly transferred from the European Economic Area (EEA) to the United States of America (USA), where it is stored and processed by our service provider. The transfer is authorized under an adequacy decision adopted by the European Commission (the EU-US Privacy Shield). For more information, please contact us at the address stated above under Section 2.</p>
9 Storage period	<p>The data of recipients who actively engage with our communications is stored in the register until the recipient unsubscribes from the list. Recipients whose engagement is determined to be low are periodically (at least once a year) removed from the mailing list.</p> <p>Please note that our system may retain your email address even after you unsubscribe or are otherwise removed from the mailing list to make sure that no further communications are accidentally sent out to you.</p>
10 Data subject rights	<p>This section applies to persons who are included in the mailing list for the Tuxera Storage and Networking Software News newsletter (each a "data subject").</p> <p>At any time, you may inform us that you do not wish to receive messages from us by following the "unsubscribe" link provided at the bottom of every communication sent to you. If you are unable to do this, you may alternatively contact us directly to inform us of the same. In each case, we will then remove you from the mailing list.</p>

	<p>If you are a data subject, you also have the right to:</p> <ul style="list-style-type: none">(a) request access to your data stored in the register,(b) request that your data be corrected or removed from the register, or(c) demand that we cease processing your data, except where a regulatory exception applies. <p>Upon your request and where it is technically feasible, we will give you a copy of the data you have provided to us or directly transmit the data to another controller.</p> <p>You also have the right to lodge a complaint with the relevant data protection authority in case you have concerns about how Tuxera processes your data. The contact details of each EU member state's data protection authority are available here. However, we are committed to addressing and resolving any concerns you may have about our data processing practices with you directly.</p>
11 Security	<p>Access to the data is limited to Tuxera officers, employees, and service providers who need access to fulfill their respective duties and functions. Personal login information is required for accessing the data. All Tuxera officers and employees with access to the data are bound by statutory or contractual confidentiality obligations.</p> <p>The register is hosted on a server which is protected by generally accepted security measures such as firewalls, encryption, and Secure Socket Layer (SSL) technology. Regular backup routines are enforced to avoid any unintentional loss of data. Physical access to the servers is strictly limited and controlled.</p>
12 Changes	<p>This document was last updated on May 16, 2018.</p> <p>Please note that our processing activities for this register may change from time to time to meet the demands and accommodate the realities of our evolving organization. You may at any time request information from us relating to our then-current practices.</p>