

PRIVACY POLICY CUSTOMERS, PARTNERS, AND PROSPECTS

This document outlines the principles applicable to the processing of personal data relating to Tuxera's customers, partners, and prospects. 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 us to manage our customer relations and partnerships and to develop our business. This includes communicating with our customers, partners, and prospects (including through newsletters), managing customer accounts, running marketing campaigns, and generating information for business development (including through website analytics).
4 Legal basis	Processing is based on our legitimate interest to manage our customer relations and partnerships and to develop our business.
5 Collected data	We process the following categories of data relating to our contacts at customer, partner, or prospect organizations: <ul style="list-style-type: none">(a) their contact details (name, mailing address, email address, and phone number),(b) their work title, role, and responsibilities,(c) the name of the organization they represent,(d) records of business communications between them and our representatives, and(e) analytics data regarding their interaction with our communications and website content.

6 Data sources	Data is collected through various online forms and online analytics tools as well as from our sales and business development representatives, referrals, and various industry events, exhibitions, trade shows and webinars.
7 Data recipients	Data is not regularly made available to third parties other than our majority-owned subsidiaries and service providers who process data based on their engagement with us. We may hand over data to a third party who purchases a part of our business to which certain customer, partner, or prospect data relates. We may also disclose data where so required or permitted by law or a lawful request from governmental authorities.
8 Data transfers	Data is mainly stored on servers located in the European Economic Area (EEA). However, our service providers may transfer data outside the EEA when providing their services. Where this takes place, we will make sure that the data transfer is covered by appropriate safeguards such as standard contractual clauses approved by the European Commission (EC) or the EC's adequacy decision.
9 Storage period	Customer and partner data is stored for as long as the underlying customer or partner relationship with Tuxera continues and for a reasonable archival period thereafter. Prospect data is manually removed at regular intervals if the prospect is not considered qualified after a reasonable time.
10 Data subject rights	In relation to your personal data that we process, you have the right to: (a) request access to your data, (b) request that we correct or remove your data, or (c) demand that we cease processing your data, except where a regulatory exception applies. 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>You also have the right to lodge a complaint with the relevant data protection authority in case you have concerns about how we process 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 policy was last updated on May 25, 2018.</p> <p>Please note that our processing activities may change over 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>