

## Privacy Policy for Virta Services and Virta.fi

This privacy policy has been compiled to better serve those who are concerned with how their 'Personally Identifiable Information' (PII) is being used online. PII, as described in Finnish privacy law and information security, is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. Please read our privacy policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your Personally Identifiable Information in accordance with our website.

### What personal information do we collect from the people that visit our website or app?

When ordering or registering on our site, as appropriate, you may be asked to enter your name, email address, mailing address, phone number, credit card information, social security number or other details you allowed to help you with your experience and to legally identify the person concerned.

#### Location

- approximate location (network-based)
- precise location (GPS and network-based)

#### Phone

- read phone status and identity

#### Photos/Media/Files

- read the contents of your USB storage
- modify or delete the contents of your USB storage

#### Storage

- read the contents of your USB storage
- modify or delete the contents of your USB storage

#### Device ID & call information

- read phone status and identity

## Other

- view network connections
- full network access
- prevent device from sleeping

## When do we collect information?

We collect information from you when you place an order or enter information on our site. We need to specify when the app collects this data which is basically all the time during usage. By using the app the user gives us the right to access and use the information requested by the app from the phone.

## How do we use your information?

We may use the information we collect from you when you register, make a purchase, sign up for our newsletter, respond to a survey or marketing communication, surf the website, or use certain other site features in the following ways:

- To allow us to better service you in responding to your customer service requests
- To quickly process your transactions.
- To prevent illegal or inappropriate use of one's identity or our services
- to assure the creditworthiness of an individual customer

We do not use the data accessed by the app anywhere else nor is this data stored after use, except for the place, start time and end time of initiated EV charging events.

## How do we protect your information?

As the data is not collected anywhere there is no need to provide protection for the information other than for the data (mentioned above) that is stored in our logs.

Our website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our site as safe as possible.

We use regular malware scanning.

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology.

We implement a variety of security measures when a user places an order to maintain the safety of your personal information.

For your convenience we may store your credit card information as long as you use our services and for guarantee reasons 180 days after in order to expedite future orders, and

to automate the billing process.

### **Do we use 'cookies'?**

Yes. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information. For instance, we use cookies to help us remember and process the items in your shopping cart. They are also used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

### **We use cookies to:**

- Help remember and process the items in the shopping cart.
- Compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since browser is a little different, look at your browser's Help Menu to learn the correct way to modify your cookies.

### **If users disable cookies in their browser:**

If you turn cookies off, Some of the features that make your site experience more efficient may not function properly. Some of the features that make your site experience more efficient and may not function properly.

### **Third-party disclosure**

#### **Do we disclose the information we collect to Third-Parties?**

We might sell, trade or otherwise transfer to outside parties your name, phone number, location data and social security number in accordance with Finnish and appropriate laws in order to develop our customer service and service network. The date we transfer is always cleansed in a way that it doesn't contain data which could be connected to an individual person.

### **Third-party links**

Occasionally, at our discretion, we may include or offer third-party products or services on our website. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

## Google

Google's advertising requirements can be summed up by Google's Advertising Principles. They are put in place to provide a positive experience for users.

<https://support.google.com/adwordspolicy/answer/1316548?hl=en>

We have not enabled Google AdSense on our site but we may do so in the future.

## We collect your email address in order to:

- Process orders and to send information and updates pertaining to orders.
- Send you additional information related to your product and/or service
- Market to our mailing list or continue to send emails to our clients after the original transaction has occurred.

## To be in accordance with law and dignity, we agree to the following:

- Not use false or misleading subjects or email addresses.
- Identify the message as an advertisement in some reasonable way.
- Include the physical address of our business or site headquarters.
- Monitor third-party email marketing services for compliance, if one is used.
- Honor opt-out/unsubscribe requests quickly.
- Allow users to unsubscribe by using the link at the bottom of each email.

## If at any time you would like to unsubscribe from receiving future emails, you can email us at

Info@virta.fi and we will promptly remove you from **ALL** correspondence.

## Contacting Us

If there are any questions regarding this privacy policy, you may contact us using the information below.

Virta.fi or

Liikennevirta Oy, Energiakuja 3, Helsinki

## LIIKENNEVIRTA LTD DESCRIPTION OF THE CUSTOMER DATA FILE

*(Finnish Personal Data Act (523/1999), Sections 10 and 24)*

### 1. Controller

Liikennevirta Ltd ("Liikennevirta") Energiakuja 3

FI-00180 Helsinki, Finland

tel. +358 50 434 0132

e-mail: support@virta.fi

## **2. Person responsible for matters related to the data file**

Jussi Palola Managing Director Energiakuja 3

FI-00180 Helsinki, Finland

tel. +358 50 434 0132

e-mail: jussi.palola@virta.fi

## **3. Name of the data file**

Customer data file

## **4. Purpose of the processing of personal data**

A customer's personal data may be processed for the following purposes:

- identification of the customer
- customer service, contacting and other customer relationship maintenance
- invoicing matters and debt collection
- production and development of charging services and other services of Liikennevirta
- monitoring the use of the charging service
- direct marketing, opinion polls and market research as well as other justified purposes

## **5. Content of the data file**

The following information about the customer is recorded in the data file:

- the user's first and last name
- address details, telephone number and e-mail address
- agreement details
- payment card number
- user name

## **6. Regular sources of data**

Customer-related data to be recorded in the data file is regularly received from the customer him-/herself in connection with the registration as a customer.

## **7. Regular data disclosures and the transfer of data outside the EU or the EEA**

Liikennevirta may disclose the customer's information mentioned under Item 5 to its subcontractors and partners, with the parts and extent of information disclosed determined by what is deemed necessary for the delivery of the services and products offered by Liikennevirta at each moment to the customer (such as the production of the charging service, deliveries, payment services, debt collection, etc.). Liikennevirta does not disclose the customer's personal data for direct marketing purposes.

Personal data recorded in the data file is not transferred outside the EU or the EEA.

## **8. Principles in accordance to which the data file has been secured**

### *8.1. Manual material*

There is no manual material.

### *8.2. Data recorded in electronic format*

Only those persons who, due to their position or duties, have the right to process customers' personal data are entitled to use the system containing customer-related data. Data is located on a server in a locked space, and the access to this space is restricted. Each person processing personal data has his/her own user name and password for the system.

## **9. Rights of the data subject**

### *9.1. Right of access and rectification*

The customer has the right to access any data related to him/her recorded in the data file. Contacts related to the right of access must be made in writing, signed and submitted to the address mentioned under Item 2. If the data in the data file contains errors or is incomplete, the customer may submit a request for rectification to the person responsible for matters related to the data file, mentioned under Item 2. The customer also has the opportunity to rectify and update his/her data him-/herself through the profile page.

### *9.2. Right to prohibit processing*

The customer has the right to prohibit Liikennevirta from processing his/her personal data for purposes of direct marketing, market research and opinion polls. In matters pertaining to prohibition and rectification, the customer may contact the controller by e-mail or mail at the address mentioned under Item 1 or contact the person responsible for matters related to the data file, mentioned under Item 2.