

PRIVACY NOTICE FOR ALLSHARES’ INCENTIVE.ONLINE PORTAL

Allshares Oy (“**Allshares**” or “**us**”) respects your privacy and is committed to protecting your privacy and personal data.

We process your personal data for our own purposes as a controller when you use Incentive.Online portal (“**Incentive.Online portal**”), a SaaS-service we offer to our customers, typically your employer. We also process some of your data in the Incentive.Online portal as a processor under instructions from our customer. To learn more about this processing, please visit the privacy notice of your employer or another party offering the Incentive.Online portal to your use.

If you are a contact person of our customer, you can find more information on how we process your personal data in our customer privacy notice on www.allshares.com. For more information on how we process personal data on our website, please visit our website privacy policy on www.allshares.com.

This privacy notice has been drafted in a layered format. By clicking the headlines below, you can move to the different parts of this notice.

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1 CONTROLLER

The controller for the personal data processing described herein is:

Allshares Oy
Business ID 1882491-3
Aleksanterinkatu 19 A, 00100 Helsinki, Finland

If you have any questions regarding this privacy notice, please contact us at: helpdesk@allshares.com.

2 COLLECTED PERSONAL DATA AND SOURCES

We only collect personal data from or about you that is essential and necessary for the purposes described in this privacy notice.

In this section, we will tell you which personal data we collect about you and how the collection takes place. In section three (3) you will find a table in which we have detailed the purposes of collecting your personal data and the legal basis for the processing of personal data as well as the relevant retention times for each personal data processing purpose.

We may collect, use, store and transfer different types of your personal data, which we have grouped in the following way:

- **Feedback data** means the feedback you have given to us about our Incentive.Online portal, insofar it contains data that can be directly or indirectly identified to you.
- **Legally obligated data** means information we collect of you to fulfil our legal obligations, e.g., related to the prevention of money laundering (if applicable).
- **Analytics data** means information collected with non-necessary cookies in our Incentive.Online portal. We use this data to improve our services. The processing of analytics data requires your consent, which you can withdraw at any given time.

Please note that not all personal data listed above is processed for all processing purposes. Below in section three (3) we have described in more detail which personal data we process for which purpose. We collect the personal data from the following sources:

- From your directly, e.g., when you provide feedback to us.
- Automatically e.g., through cookies placed to the Incentive.Online portal.

3 PROCESSING PURPOSES, LEGAL BASES, AND RETENTION TIMES FOR PROCESSED PERSONAL DATA

We process your personal data only within the limits permitted by law. We usually process your personal data based on the following legal basis of processing:

- Your **consent** to the personal data processing according to Article 6(1)(a) of the General Data Protection Regulation (EU) 2016/679 (“GDPR”).

- The processing is necessary to fulfil our **legal obligations** according to Article 6(1)(c) of GDPR.
- The processing is necessary for the purposes of the **legitimate interests** according to Article 6(1)(f) of GDPR, pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms.

In the table below, we have described the personal data we are going to process together with the purposes for which we are going to process this data as well as our legal bases for such processing and the retention times for different sets of data.

Processed personal data	Processing purposes	Legal basis for processing (GDPR Art. 6)	Retention time for personal data
Feedback data, such as how many stars you have given to our Incentive.Online portal and your open feedback on the service (if applicable).	Legitimate interest to collect feedback on our service and based on the received feedback, improve our services further.	Legitimate interest GDPR Art. 6(1)(f)	Six years.
Analytics data, such as IP address, device type, browser version and type	Placing cookies on your device.	Consent GDPR Art. 6(1)(a)	Six months.
Analytics data, such as IP address, device type, browser version and type	Retaining and deleting your cookie consent according to our pre-defined retention times.	Consent GDPR Art. 6(1)(a)	Six months.
Analytics data, such as IP address, device type, browser version and type	Improvement of our Incentive.Online portal based on the collected analytics.	Consent GDPR Art. 6(1)(a)	Six years.

We may retain your information longer than stated above, if it is necessary to fulfil the obligations set by law or to prepare, present or defend against legal claims or to resolve disagreements. After we no longer have any purpose to retain your data, it is deleted or anonymized.

4 RECIPIENTS OF PERSONAL DATA

We may share your information with third party recipients in the following situations:

- When it is necessary for the purposes listed in point three (3).
- If required by law, we may disclose your personal data to public authorities.
- Your information may be shared with a person or entity that acquires all or most of our company, shares, or assets, or with which we are in the process of merging.

We may also share your information when we believe in good faith that its disclosure is necessary to exercise our rights or defend against a legal claim, to ensure your or others' safety, to investigate fraud, or to respond to a government request.

We also share personal data with trusted third-party service providers. These service providers process personal data on our behalf and based on our instructions to offer us their services. Such service providers include, for example Piwik Pro and Trustmary Finland.

The third-party service providers have access to or the ability to process your personal data to provide their services to us. These third parties may not use your information for purposes other than those related to the services they provide. We have entered into data processing agreements with all above-mentioned third parties.

5 INTERNATIONAL TRANSFERS OF PERSONAL DATA

Your personal data might be transferred outside of the European Union (“EU”) and/or the European Economic Area (“EEA”) by us our service providers. When this happens, we are committed to ensure the adequate level of your personal data protection by adhering to the obligations laid down in the GDPR.

As a rule, we protect international personal data transfers by using [standard contractual clauses](#) (link to English version), approved by the European Commission on 4 June 2021, with all of our service providers processing data outside of the EEA. If necessary, we also engage additional safeguards to protect your data in accordance with prevailing market practise.

For more information on the international transfer of your personal data and our service providers located outside of the EEA, please contact us at: helpdesk@allshares.com.

6 DATA SUBJECTS' RIGHTS

You have multiple different rights related to your personal data. Below, you can find a summary of all your rights and possible limitations that apply to them.

- **Right to request information on personal data processing.** You have the right to receive transparent information on the personal data we process on you.
- **Right to request access to your personal data.** You have the right to obtain a copy of any personal data we hold about you.
- **Right to request correction of your personal data.** You have the right to ask us to correct information about you that is incomplete or incorrect.
- **Right to request deletion of your data.** You have the right to ask us to delete personal data when there is no longer a suitable basis for processing the data.
- **Right to object to the processing of your data** when the processing basis is our (or a third party's) legitimate interest and you have a reason related to your personal special situation to object to the data processing. On top of that, you always have the right to object to the processing of your data for direct marketing purposes.
- **Right to request the restriction of the processing of your data.** With this right, you can ask us to stop processing your data, for example, until you verify the correctness of the data or the legal basis for processing.
- **Right to request the transfer of your data from one system to another** when the processing of personal data is based on consent or agreement.
- **If the processing is based only on your consent,** you have the right to withdraw that consent at any time. However, the withdrawal of consent does not affect the legality of the processing of personal data that was carried out before the withdrawal was made.

You can use the above-mentioned rights by sending an email to helpdesk@allshares.com or by letter to the address mentioned at the start of this notice.

Some of these rights only apply with some legal basis of processing. To find out which rights apply in which situations, you can visit the Finnish DPA's website [here](#) (link in English).

You also have right to notify the Finnish DPA, if you are unsatisfied with how we process your personal data. For Finland, such notification can be made [here](#) (link in English).

7 CHANGES TO THIS PRIVACY NOTICE

We update this privacy notice on a regular basis. You can always find the latest version on the Incentive.Online portal.