

# Privacy Policy of BearIT

## 1 . General Terms

By personal information is meant any information that concerns a particular natural person or his/her family members. Personal information covers any information that relates to an identifiable individual directly or indirectly, such as name or identification number or any other information specific to his/her physical, economic, cultural or social identity.

This Privacy Policy describes how and when BearIT collects, uses and shares your personal information. This Privacy Policy also concerns any websites, web applications or mobile applications (collectively, the "Service") provided by BearIT, for which users can sign up or from which information on the Service usage is collected.

BearIT is committed to follow a valid regulation of personal information and privacy, and processes personal information in accordance with good information management and processing practices.

## 2. Purpose of the use of personal information collected

BearIT may collect and process personal information for the following purposes:

- Registration of employees
- Registration of job applicants
- Registration of trainee applicants
- Monitoring Service usage for the purpose of optimization and further development of the Service
- User accounts management and communication with users
- Communication with customers
- Business marketing
- Marketing or research reports, analysis and agreements
- Business planning and development

The information collected by BearIT will not be used for any automated decision-making or profiling.

## 3. Types of information collected

BearIT collects information from the person itself as well as from other sources, such as partners, service providers and the Service. The information is collected through different channels, such as the Internet, email, meetings, telephone and face-to-face conversations.

### **Information collected from the person itself**

BearIT may collect personal Information that you voluntarily provide when you contact BearIT through a contact form, apply for a job or a training, request an offer or register for the Service. The information collected from the person itself may be

- Name, position, organisation
- Contact information, such as address, e-mail address and phone number
- CV, applications, photos
- Contacts, feedback and other messages
- User's identification information

BearIT uses the information collected from the person itself in recruiting, user accounts management and business analysis, planning and development as well as to organize trainings, contact clients and users, and make agreements.

#### **Automatically collected information on the Service usage**

When a user has access to the Service provided by BearIT, BearIT collects technical information on user's computer or device and log data on website usage, such as

- Browser type and version
- Device and operating system
- Websites from which the user has arrived.
- Information on the users' activities while using the Service (such as pages visited and time spent on the website).
- IP address are collected and used only for locating the user on country level.

Automatically collected information is used for Service development, usability improvement and technical problem solving.

#### **Information from third parties**

BearIT uses analytics and tracking technologies provided by third parties (e.g. Google Analytics). The information collected from these technologies is not combined with information from other sources or with specific individuals and is only used for internal statistic analysis. Information that includes identification information, such as IP addresses, is anonymized.

BearIT may also use other information collected from third parties. In such cases, we require that the third party has ensured that the information is collected and shared in accordance with legislation.

## **4. Cookies and other tracking technologies**

Cookies are small text files that are stored on user's computer or device when using our Service. The use of cookies is a standard practice to recognize unique devices, operating systems and browsers across browsing sessions. BearIT uses cookies to recognize a particular browser when the user uses our Service next time. BearIT does not use cookies to identify a person.

If the user does not accept the cookies, we recommend configuring the Internet browser to refuse the cookies from our Service. Cookies blocking or restriction can be done through browser settings or by selecting private or incognito mode from the browser. For managing cookies on a mobile device the settings for cookies or tracking features need to be configured. Note that if the cookies are disabled or removed, some of the features of our Service may not operate as intended.

BearIT also uses third-party analytics service providers, such as Google Analytics, who may use cookies or other technologies to collect information on user's activities across our Service. However, third-party service providers collect, use or disclose the information to the extent necessary to allow them to perform the services provided to BearIT. Third-party providers have their own privacy policies, and we recommend that users read their privacy policies in order to understand the manner in which personal information is processed by these providers. BearIT is not responsible for the data collection of these providers.

## 5. Disclosure of personal information

BearIT may disclose personal information to third parties for justified purposes in accordance with legislation. BearIT may also disclose personal information to a partner who provides with certain business-related functions. These companies are authorized to process personal information only when necessary to provide these functions to BearIT. BearIT has contracted with these partners to ensure that the personal information is processed in accordance with the current legislation.

BearIT may disclose personal information to authorities or other third parties if it is required to do so by law. Personal information is not disclosed or transferred to third countries or international organisations.

## 6. Security of the register

The personal information collected by BearIT is processed carefully and the information as well as the information systems are protected properly. Whenever personal information is stored on Internet servers, both physical and digital security are being taken care of properly.

Personal information in digital form is protected by using the technical means generally accepted in the security industry, such as firewalls, encryption methods and data access control. Only particular employees of BearIT have access to the information in the registry with a data access granted by BearIT. Personal information in manual form is stored in a locked space and access to this information is restricted with access control. Personal information is processed only by those employees whose responsibilities include processing of personal information.

BearIT may employ a service provider who processes personal information on behalf of BearIT. In such cases, BearIT has contracted with the service provider to ensure appropriate protection of the personal information.

In case a personal data breach occurs, BearIT will communicate with the supervisory authority and the data subject without undue delay.

## 7. Data storage

BearIT stores the collected personal information only as long as necessary for the purpose it was collected for or to obey legal obligations. If there is no need for storing the personal information, a registered person withdraws his or her consent to processing of personal information or requires the information to be deleted, the personal information will be deleted or transformed into such form that the person can no longer be identified.

## 8. Rights of the registered person

- Access to personal information. A registered person has the right to know if BearIT processes his or her personal information and request access to that information.
- Rectification or deletion of the information. A registered person has the right to request that inaccurate personal information concerning the person itself is rectified or complemented, or deleted, if the information is redundant or outdated.
- Withdrawal of consent. If the processing of personal information is based on consent, the registered person has the right to withdraw his or her consent at any time.

- Restriction or objection to processing information. The registered person has the right to object the processing of personal information based on profiling, legitimate interest of the company or consent given by the person, except if BearIT is able to demonstrate that the purpose for processing of personal information overrides the interests or the rights of the registered person (e.g. BearIT's legal obligations). The person has also the right to restrict processing of his or her personal information for a certain period of time due to, e.g., resolving a disagreement.
- Data portability. When processing of personal information is based on consent or contract, the registered person has the right to receive his or her information in a commonly used machine-readable format and the right to transmit the information to another company or controller. This, however, concerns only such information that the person itself has provided to BearIT.
- Complaint to authority. Every registered has the right to lodge a complaint with the supervisory authority.

In order to exercise these rights, the person is required to submit a written request to the contact person of BearIT (see section 9). BearIT may, if necessary, request the person submitting a request to confirm his or her identity.

## 9. Contact information

BearIT Oy (Business ID: 2529594-1).

Åkerlundinkatu 11 D, 33100 Tampere, Finland

info@bearit.fi