Tractr (Spacent) Privacy Policy

Updated on 17.11.2020

Name of the register: User register

General

This Privacy Policy describes how Tractr Oy ("**Tractr**" or "**we**" or **"Spacent")** processes personal data we collect from the individuals ("**User**" or "**you**") who use the Spacent App Service and/or become Our clients or potential clients.

In this Privacy Policy, you will find information on what types of data is collected, how the data is collected, used and stored and what are your rights as a data subject. You will also find information about our cookie policy and how to contact us should you have any questions regarding this Privacy Policy.

The Spacent App is a service provided by Tractr Oy at no cost and it is intended to be used as a platform for flexible workspace services for companies (the "**Service**"). This privacy policy applies to all individuals whose personal data is processed in relation to the Service provided by Tractr.

Tractr processes the personal data of those using our Service in accordance with the EU General Data Protection Regulation (2016/679), ("**GDPR**") and other applicable laws and decrees. *Personal data* means any information that directly or indirectly allows a person to be identified.

Contact Information

Controller

Name: Tractr Oy

Address: Yliopistonkatu 4, 00100 Helsinki, Finland

Contact information: hello@spacent.com

What Are the Legal bases and Purposes of the Processing of Personal Data?

We process personal data only when there are legal bases for the processing, and we only process data that is relevant for the purposes it was collected or obtained for. The legal bases for the processing of your personal data are *agreement between us for providing the Service*, *our legitimate interests* (for e.g. customer relationship management and the delivery of our service) and *your consent*.

We process personal data for the purposes of the delivery and development of our Service, processing your order and managing your account, marketing (including direct and/or targeted marketing, profiling for marketing purposes), managing the customer relationship, generating statistics and analyzing the usage of our Service. We track the usage of our Service to develop the Service and offer you a better user experience. We generate statistics regarding usage in the case of an error in the Service.

What Data Do We Process?

We process the following personal data of our customers using the Service:

- **User Information** such as name of the company and company's contact person, telephone number, email address and information relating to the payment instrument and invoicing.
- **Log Information** such as the IP address of your device, name and identification number of your device, operating system version, the configuration of the App when utilizing our Service, the time and date of your use of the Service, cookies and other statistics.
- **Information of the customer relationship and account** such as information of past and current contracts and orders (incl. invoicing details), correspondence with the user and other information which the user voluntarily provides when creating an account of modifying it or when providing feedback on our Service.
- **Information regarding your direct marketing opt-in or opt-out**
- **Information gathered with the data subject's consent** such as your location data.

Some of the personal data we collect are necessary for the proper performance of our Service. In order to register as user, you need to provide us with the user information mentioned above. Processing of certain types of your personal data requires your consent, such as processing for electronic direct marketing purposes or processing of your location data. Your consent for processing of your location data is also necessary for the proper performance of the Service.

How Do We Collect Your Data?

The data we collect is provided primarily by you. We collect and process the following data:

- Data provided by you when you register as a user to our Service or when you voluntarily provide feedback on our Service platform or via other means of communication; and
- Data that is gathered automatically when you use our Service.
- Data that is gathered from third party service providers.

To Whom Do We Disclose Data and Do We Transfer Data outside the EU or EEA?

We may disclose data described in this register to our co-operation partners and subcontractors, who facilitate our Service, assist us in analyzing the usage of our Service and provide services that are related to the performing of our Service. We will only share your personal data to the extent necessary for providing the service. Otherwise we do not disclose data from the register to external parties unless required by the legislation or an order by the authorities.

We transfer personal data outside EU/EEA as a part of our operations. When we transfer personal data, we will make sure that the personal data in question is protected in accordance with applicable laws and regulations by implementing proper safeguards, namely by using the EU commission model clauses.

How Do We Use Cookies?

Cookies are small text files that are transferred to your device while using the mobile application. Our Service and/or webpages uses cookies and other similar technologies for managing and developing the application as well as improving and analyzing the user experience. If you use our Service and/or webpages and the cookies have been enabled in your device settings, we deem that you have consented to the use of cookies in connection to the Service and/or webpages.

We may use the following cookies:

Necessary cookies and service provision: Cookies are essentially necessary for the proper functioning of our Service and/or webpages and they enable a good user experience. These cookies do not collect information that would enable us to identify the user.

Functionality cookies: These cookies enable personalized content and recognize and remember your preferences when you return to the application.

Statistics cookies: These cookies can be used to improve the functioning of the Service and/or webpages. We receive information about how the application is used, e.g. which parts of our application are the most popular and how long users stay on the site while using the application.

Social media and marketing cookies: By using these cookies we can make the content of the Service and/or webpages as individually customized as possible, and thereby show e.g. targeted advertisement and content based on the user's prior behavior.

Our website may include links and connections to third party websites. These third party services and applications offered in connection to the Service and/or webpages are subject to the privacy policies or notices of such third parties. We recommend you to familiarize yourself with such third party privacy policies or notices.

You can review and manage your cookie settings and consent at any time on <u>Manage Cookies -subpage</u> or by modifying the settings on your device. Please note that by blocking or deleting cookies you may not be able to take full advantage of the Service.

How Do We Protect and Store Your Data?

We use appropriate technical and organizational measures to protect your personal data. The data we collect and obtain is stored into secure physical environments with limited access and databases protected by firewalls and passwords. The personnel and processors of personal data are obliged to keep the data strictly confidential, and each user has a user ID and password to the systems where personal data is stored.

The personal data are stored for the period necessary to fulfill the purposes outlined in this Privacy Policy. After that, the data will be deleted within a reasonable timeframe or rendered anonymous. We store data in accordance with applicable legislation, and regularly review the need for storage of personal data. The retention period for log data is 30 days.

Children's Privacy

These Services do not address anyone under the age of 13. We do not knowingly collect personally identifiable information from children under 13. In the case we discover that a child under 13 has provided us with personal information, we immediately delete this from our servers. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us so that we will be able to do necessary actions.

What Are Your Rights as a Data Subject?

As a data subject you have the right, according to GDPR, to verify whether we have processed your personal data. You also have the right to access your personal data stored in this register, and the right to require rectification or erasure of that data. You also have the right to transmit your data to another controller.

When the processing of personal data is based on your consent, you have the right to withdraw that consent at any time. The withdrawal of your consent does not affect the lawfulness of processing based on consent before the withdrawal. When we process information regarding your location, the processing is always based on your consent. You can also deny any direct marketing and withdraw your consent regarding electronic direct marketing by following the instructions received in connection to the marketing communication.

You also have the right to object to the processing of your personal data or request restricting the processing, as well as the right to lodge a complaint with a supervisory authority.

Requirements and requests concerning your rights as a data subject should be submitted in writing to the address mentioned above in section "Contact Information".

Changes to this Privacy Policy

We may update this Privacy Policy from time to time. Therefore, you are advised to review this page periodically for any changes. If any changes are made, we will post the amended policy on this page with an indication to the amendment date. The changes are effective immediately after they are posted on this page.

Contact Us

Should you have any questions or recommendations regarding this Privacy Policy, do not hesitate to contact us at hello@spacent.com.