

GLASTON PRIVACY STATEMENT

Last updated on 10 September 2020

1 ABOUT THIS PRIVACY STATEMENT

This privacy statement (“Privacy Statement”) is related to processing of personal data by Glaston Corporation as a data controller. By Glaston Corporation, we mean all entities controlled by Glaston Oyj Abp (“Glaston” or “We”). This Privacy Statement describes how we process personal data of our customers’ and potential customers’ representatives, users of Glaston’s online services as well as other contacts.

Please read this Privacy Statement carefully prior to accessing Glaston online services, including our webpages. If you do not agree with this Privacy Statement, we expect you to stop using our online services.

Glaston is committed to protecting your privacy and personal data. We process your personal data in accordance with this Privacy Statement and applicable laws including European Union’s General Data Protection Regulation (EU 2016/679).

We reserve the right to amend this Privacy Statement, so we hope that you review this Privacy Statement from time to time. If you have any questions about our privacy practices, please refer to the Section 2 of this Privacy Statement for information on how to contact us.

2 DATA CONTROLLER AND CONTACT DETAILS IN PRIVACY MATTERS

Data controller for the processing of your personal data on our website <https://glaston.net> is:

Glaston Oyj Abp
Lönrotinkatu 11
00120 Helsinki
Finland

Other websites of Glaston corporation may be subject to specific privacy policies showing the according data controller for such websites.

The Glaston corporation company with whom the company you represent has a contractual relationship with is the data controller for data processing activities related to the performance of such contract.

With regard to the processing of data within our groupwide Customer-Relationship-Management system, each individual Glaston corporation company (<https://glaston.net/contacts/>) acts as a joint controller with Glaston Oyj Abp in relation to the processing of the data of its customers and its prospective customers.

You can contact us regarding all matters on data privacy under:

Privacy matters / Glaston Corporation
Email: privacy@Glaston.net
Address: Lönrotinkatu 11, 00120 Helsinki, Finland

3 PERSONAL DATA PROCESSED

3.1 Personal data processed about our customers’ and potential customers’ representatives

- name
- contact data (address, e-mail, telephone number)
- necessary information concerning the organization the person represents, including the job title
- language preferences
- information relating to managing a customer relationship and other relevant connection (e.g. complaints, feedback and recording of customer service telephone calls)
- content, correspondence and consequences related to feedback and complaints
- relevant information related to our events and your participation
- permissions, consents and prohibitions regarding direct marketing

The personal data is obtained directly from the data subject him/herself when the data subject contacts Glaston, enters his/her details on Glaston's websites or gives his/her details to Glaston e.g. in trade fares.

3.2 Personal data processed in our online services

3.2.1 Personal Data you provide to us

You can access our websites without entering any personal data. However, certain parts of our websites and some of our online services may require us to collect personal data for the services to function properly. Personal data that is collected in such cases generally consists of contact and personal details such as:

- name
- address
- e-mail address
- telephone number

Some parts of our online services may require you to register. Once you register or have otherwise been assigned a specific identification code, to access your accounts, we may ask further personal details about you.

3.2.2 Usage information

By visiting our websites, certain technical and other information is automatically sent to us by your computer (i.e. information about your browser, source of your visit and IP address).

3.2.3 Cookies

If technically necessary or if you have given us your consent to do so, we may place cookies on the device that you are using. Cookies are small text files which assign your device a unique identifier, enable certain features of the online service to function properly and help us to personalize our online services and webpages to you. We may also use information obtained through cookies to assess how and when you have used our online services or webpages and help us to improve and develop our services.

If you do not wish to receive cookies altogether, you may set your web browser to disable them. You may also delete cookies from your device at any time. Kindly note, that disabling cookies may prevent you from using some of our online services or some of the features of our webpages.

3.2.4 Social Media Plugins

Usage of social media plugins may result in sending your personal information to the respective social media platforms. Opening a social media plugin may allow the third party website to set cookies on your device, permitting its operators to track your online behavior. This can be prevented by disabling the acceptance and storage of cookies in the browser settings or not accessing such third party content.

3.2.5 Google Analytics

With your consent we use Google Analytics, a web-analysis service provided by Google LLC 1600 Amphitheatre Parkway Mountain View, CA 94043 ("Google"). The information generated by Google Analytics cookies is used by Google on our behalf to evaluate the use of our websites, to compile reports on website activity and to provide us with other services related to website and Internet use. The information generated by Google Analytics cookies about your use of these websites is usually transferred to a Google server in the USA and stored there. The storage period at Google for corresponding data at user and event level is 14 months (shortest possible setting option). In this context, we would also like to point out that Google Analytics is only used on these websites with IP anonymization activated. This ensures that your IP address will be shortened by Google within member states of the European Union (EU) or in other states of the agreement on the European Economic Area (EEA). Only in exceptional cases will the full IP address be transferred to a Google server in the USA and shortened there.

Google may use the personal data collected to contextualize and personalize the ads of its own advertising network. You can revoke your consent in accordance within the settings of our cookies management tool and you can also prevent the acquisition of the data relating to your use of the websites (incl. your IP address) by Google, as well as its processing by Google, by downloading and installing the Analytics opt-out browser add-on.

3.2.6 Salesforce Pardot

With your consent we use Salesforce Pardot for our marketing actions which is provided by Salesforce.com Inc, The Landmark at One Market, Suite 300, San Francisco, CA 94105 (“Pardot”). With Pardot we track your activities on our websites to see what content is interesting to you. We collect this information in situations such as: if you express an interest in obtaining additional information about our services, request customer support, use our “Contact Us” or similar features, register to use our websites, sign up for an event or newsletter, webinar or contest, or download certain content. Pardot will not store your data longer than one year.

4 PURPOSES OF PROCESSING

Glaston processes personal data to:

- Ensure an efficient and secure provision and use of our online services;
- Develop and improve the online services for a better quality and broader scope of services;
- Customize the services and content for your specific needs and interests;
- Contact you;
- Legal and audit purposes;
- Conduct research and collect statistics.

Our aim is to produce cost efficient online services without you having to register separately to each of the different services. Therefore, your personal data may be used and shared across our services to fulfil the specific purpose in question.

With your consent, we may send you information electronically on the products and services you have been using or acquiring, as well as other related products and services. Our policy is to include instructions for unsubscribing from receiving such e-mails.

5 WHAT IS THE LEGAL BASIS FOR THE PROCESSING?

5.1 Contract

We process your personal data for the performance of the contract between you and us when you have agreed to our Site Policy or other applicable terms applicable on our websites and have begun to use our webpages.

You also enter into contract with us whenever you create a profile in our services.

In addition, we process your personal data in order to take steps at your request prior to entering into contract defined above.

5.2 Legitimate Interest

Part of our processing is necessary for the purposes of our legitimate interest. Our legitimate interests allow us to process your data for other reasons than merely for the performance of the contract between us and you. We may for example develop, monitor and analyze our webpages and services as well as send communication and marketing for you based on our legitimate interest.

You may contact us if you consider that your interests or fundamental rights and freedoms override our legitimate interest and require protection of your personal data.

5.3 Consent

We process personal data on the basis of your consent when you consent to receiving electronic direct marketing from us or when you consent to the use of cookies and other tracking technologies.

You will always have the right to withdraw your consent at any time by contacting our contact person or by clicking the respective link provided in our marketing messages. Such withdrawal does not, however, affect the lawfulness of processing based on consent before the withdrawal.

6 HOW DO WE SHARE YOUR INFORMATION

Glaston does not sell your personal data to any third parties for e.g. marketing purposes.

We may disclose information about you to others if we have a good faith belief that we are required to do so by law or legal process, to respond to claims, or to protect the rights, property or safety of Glaston or others.

Aggregate statistics about users of our online services or site activity may be provided to third parties. Your personal data may be shared to companies that participate in providing our online services to you. Your personal data may also be shared to companies that you represent as well as companies that are part of our group of companies. Your personal data is shared for the above purposes only if there is a written agreement in place between us and the receiving party and when the party in question has established at least the same level of protection of your personal data as Glaston.

We also share personal data with third-party companies to perform services on our behalf, such as analytics and marketing services, hosting services and other IT related support. Such service providers are data processors processing your personal data on our behalf and in accordance with our instructions. We contractually require these third-party service providers to maintain the confidentiality of the information we share with them, and we contractually require them to comply with applicable data protection laws as well as to not use your personal data for anything other than to provide services on our behalf.

7 DO WE TRANSFER YOUR PERSONAL DATA OUTSIDE OF THE EU AND THE EEA?

Glaston is a global business and as such your personal data may be transferred to and processed in countries around the world, including countries outside of the European Economic Area, some of which do not provide the same level of protection for personal data as is provided within European Economic Area. Glaston will however take steps to ensure that your personal data is transferred and processed securely, in accordance with European Union requirements.

We use service providers and servers located in various countries around the world. Therefore we or our service providers transfer your personal data outside the country where you use Services, including to countries outside the EU and EEA that do not have laws providing specific protection for personal data or that have different legal rules on data protection.

We ensure that a legal basis for such a transfer exists and that adequate protection for the personal data is provided as required by applicable law. We use standard contractual clauses approved by the European Commission and require that the receiving party uses appropriate technical and organizational information security measures.

8 HOW LONG DO WE STORE YOUR PERSONAL DATA?

We will not retain your personal data for longer than is necessary for the defined purpose of the processing of personal data (e.g. managing the rights and obligations related to customer relationship) or for legal requirements. Personal data is kept for the time necessary to provide the service requested by you or until you request the deletion of such data.

9 YOUR RIGHTS: HOW TO ACCESS, UPDATE AND MANAGE YOUR INFORMATION?

You have a right to access, update and manage your own personal data under the applicable data protection laws. If you wish to exercise any of the rights defined below in this section 9, please contact us via privacy@glaston.net.

We may ask you to provide further information in order to identify you.

9.1 Right to Access Your Data

You are entitled to obtain confirmation on whether or not we process personal data about you. You may also have information on our means of processing as well as a copy of the personal data undergoing processing. We may charge a reasonable fee based on our administrative costs if you request further copies.

9.2 Right to Rectify Your Data

You shall have the right to obtain from us without undue delay the rectification of inaccurate personal data concerning you. You may have your incomplete data completed if you provide us with additional information or statement.

9.3 Right to Erasure

If you no longer want us to actively process your personal data, you can have us delete your personal data if:

- (i) your personal data are no longer necessary in relation to the purposes for which they were processed;
- (ii) you withdraw your consent;
- (iii) you object to the processing and there are no overriding legitimate grounds for the processing;
- (iv) the personal data have been unlawfully processed; or
- (v) the personal data have to be erased for compliance with a legal obligation in applicable law.

9.4 Right to Restriction of Processing

You have the right to obtain from us restriction of processing where one of the following applies:

- (i) the accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy of the personal data;
- (ii) the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- (iii) we no longer need the personal data for the purposes of the processing, but you require that we store your data for the establishment, exercise or defence of legal claims; or
- (iv) you have objected to processing pursuant and the verification whether our legitimate grounds override your rights and freedoms.

9.5 Right to Data Portability

You have the right to receive the personal data concerning you which you have provided to us (for example by registering and creating a profile) in a structured, commonly used and machine-readable format. You have the right to have the data transmitted to another controller if:

- (i) the processing is based on consent or on a contract; and
- (ii) the processing is carried out by automated means.

9.6 Right to Object Processing

You have the right to object at any time processing of your personal data on grounds relating to your particular situation, at any time to processing of your personal data which is based on legitimate interest, including profiling.

We shall no longer process your personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms.

You have the right to object to direct marketing and the processing of your personal data for such purposes.

9.7 The right to lodge a complaint to the supervisory authority

In case you suspect a breach of data protection legislation in processing of your personal data and the matter is not solved amicably between you and us by negotiating, you may contact the competent supervisory authority to lodge a complaint.

The supervisory authority you may lodge a complaint with is the authority of the Member State of your habitual residence, place of work or place of alleged infringement.

10 PROTECTION OF YOUR INFORMATION

Glaston has undertaken appropriate technical and organizational measures to protect personal data related to you. Such measures include i.e. user controls, firewalls, secure connections, virus protections, sufficient outsourcing agreements and adequate training of our staff.

Kindly note that in providing your information over a public or third party network, you do so at your own risk