

**You have the right to object, on grounds relating to your particular situation, to the processing of your personal data at any time when we process your data based on our legitimate interests. Please see sections 3 and 7.6 of this privacy policy for further information.**

# Enervent eWind mobile application privacy policy

## SUMMARY

We are committed to protecting your privacy. Your trust is important to us.

We process your personal data mainly based on your consent, but also based on the terms of use concerning the application, to comply with legal obligations, and based on our legitimate interests.

The data we process about you can be categorized as (i) data you have consciously provided us, (ii) observed data of e.g. your application use, (iii) derived data built on data we have about you, and (iv) data inferred through probability-based analytic processes.

We use personal data to deliver and personalize the Enervent eWind app, to provide customer service, to develop our products and services, and to facilitate troubleshooting, maintenance and reminders thereof as well as spare part purchases.

We only use your data as long as necessary to fulfil the purposes mentioned above. If you delete the Enervent eWind app from your device or otherwise withdraw your consent for critical processing of your personal data, i.e., for the purposes of delivery and operation of the App, development of the App and our ventilation products, and for analytics covering App usage, you as an App user and your mobile device, we will delete your personally identifiable data without undue delay.

We want to give you control and choice over the processing of your personal data. We have listed different means that can be used to manage and control data processing in section 7.

## CONTENTS OF THIS PRIVACY POLICY

1. Introduction
2. Our information as the controller of your personal data
3. Purposes for the collection of your personal data and their legal bases
4. What data we collect and how long do we store them
5. Sources of personal data
6. Third parties who receive your personal data
7. Your rights
8. How to contact us

### 1 INTRODUCTION

Enervent Oy ("Enervent") is committed to protecting the privacy and security of your personal information. This privacy policy describes how we collect and use personal information about you when you download and use the Enervent eWind mobile application ("App").

We are continuously developing the App and our services, and therefore reserve the right to change this privacy policy by informing you of such changes in the App. Changes may also be based on changes in legislation. We recommend that you read this privacy policy on a regular basis to keep track of any changes. In case the processing of your personal data is based on your consent, we will ask for your renewed consent prior to processing your data based on changes in our privacy policy.

You may download the App through Apple's App Store or Google Play. The privacy policies of these providers apply in addition to our privacy policy. You should familiarize yourself with the terms and privacy policies provided by device platforms. Apple terms are available [here](#) and Google terms [here](#).

Please note that this privacy policy is for information purposes only and does not establish any obligation for Enervent to provide services to you.

### 2 OUR INFORMATION AS THE CONTROLLER OF YOUR PERSONAL DATA

<b>Controller's name</b>	Enervent Oy
<b>Address</b>	Kipinätie 1, 06150 Porvoo
<b>Telephone</b>	+358 207 528 800
<b>Contact person</b>	Sonja Häggman, sonja.haggman@enervent.com

**3 PURPOSES FOR THE COLLECTION OF YOUR PERSONAL DATA AND THEIR LEGAL BASES**

Purpose	Legal basis
Delivery and operation of the App	Your consent
Development of the App and our ventilation products	Your consent
App usage, App user and mobile device analytics	Your consent
Ventilation equipment analytics	Your consent
Facilitation of spare part purchases and ventilation equipment maintenance	Your consent
Ventilation equipment troubleshooting	Your consent
Ventilation equipment maintenance reminders	Your consent
Complying with our obligations in the App's terms of use	Processing is necessary for the performance of the App's terms of use to which you are subject
Crisis communication in case of product recalls or data security breaches	Processing is necessary for compliance with a legal obligation to which we are subject
Complying with legal obligations and responding to legal processes or requests for information issued by government authorities or other third parties	Processing is necessary for compliance with a legal obligation to which we are subject
Mergers and acquisitions and asset sales where we are involved	Processing is necessary for the purposes of our legitimate interests to develop and manage our business
Supporting and maintaining network and system security	Processing is necessary for compliance with a legal obligation to which we are subject; and
	Processing is necessary for the performance of the App's terms of use to which you are subject; and
	Processing is necessary for the purposes of the legitimate interest pursued by the controller;

	such legitimate interest being addressing data security issues
--	--

#### 4 WHAT DATA WE COLLECT AND HOW LONG DO WE STORE THEM

With respect to data we have processed based on your consent, we will delete your personal information within undue delay upon the withdrawal of your consent. With respect to personal data we have processed under other legal grounds (see above), we will only retain your data for as long as necessary to fulfil the purposes we collected it for. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of standard retention periods for different aspects of your personal information are available below. In case your right to erasure is exercised (see section 7.3), any personally identifiable information will be deleted without undue delay.

In some circumstances we may anonymize your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Please note that in case of data security breaches or other incidents involving law enforcement or other official proceedings or investigations, we may be required to store your data until such proceedings or investigation is completed.

CATEGORY OF DATA		RETENTION PERIOD
<b>DATA PROVIDED BY YOU</b>	Contact information: name, email address, address, phone number	Deleted within 30 days from the deletion of the App from your device or from the withdrawal of your consent
	Consents	Deleted within 30 days from the deletion of the App from your device or from the withdrawal of your consent
<b>OBSERVED DATA</b>	Equipment data: ventilation equipment's identification number, serial number, settings, equipment failures, maintenance information and needs and sensor measurement data	Ventilation equipment's identification number and serial number will be deleted within 30 days from the deletion of the App from your device or from the withdrawal of your consent, thereafter other information will not be personally identifiable
	Device information: the type of device you use, operating system and its version, and the device identifiers	Device identifiers will be deleted within 30 days from the deletion of the App from your device or from the withdrawal of your

		consent, thereafter other information will not be personally identifiable
	Log data: data that is collected in a case of an error in the App. Such data are your device internet protocol address, device name, operating system version, the configuration of the App, and the time and date of your use of the App	Device internet protocol address and device name are deleted within 30 days from the deletion of the App from your device or from the withdrawal of your consent, thereafter other information will not be personally identifiable
	Mobile analytics: how often you use the App, the events that occur within the App, aggregated usage, performance data and where the App was downloaded	Any personally identifiable information will be deleted within 30 days from the deletion of the App from your device or from the withdrawal of your consent, other data is anonymized upon deletion of your contact information and device identifier
<b>DERIVED DATA</b>	Data that is created by us from data provided by you and observed data, by building on such data and aggregating App user data, such as segmenting you to a specific group of users or calculating possible interests	Any personally identifiable information will be deleted within 30 days from the deletion of the App from your device or from the withdrawal of your consent, other data is anonymized upon deletion of your contact information and device identifier
<b>INFERRED DATA</b>	Data that created by us and it is the product of probability-based analytic processes and used to make predictions about equipment maintenance needs	Any personally identifiable information will be deleted within 30 days from the deletion of the App from your device or from the withdrawal of your consent, other data is anonymized upon deletion of your contact information and device identifier

## 5 SOURCES OF PERSONAL DATA

We collect your contact information and consents mainly directly from you. Equipment data is collected mainly from you via your ventilation equipment. Please note that equipment data will only be collected in case you have connected your ventilation equipment to the internet via your WLAN network and provided your consent to such processing – otherwise the App will only function locally between your mobile device and your ventilation equipment. Log data, device data, and mobile analytics are collected from you via your phone. Derived and inferred data are generated by us.

With your consent, equipment data may also be collected from a professional rendering repair and maintenance services on your ventilation equipment.

The provision of your contact information, relevant consents, device information and mobile analytics data are required in order for you to use the App. In case you do not provide us the data

we require, you will not be able to use the App. The provision of equipment data is not required but improves the App user experience and allows us to develop our products and services and allows a professional to offer and render ventilation system rendering repair and maintenance services to you via remote access.

## 6 THIRD PARTIES WHO RECEIVE YOUR PERSONAL DATA

We may provide access to our systems and/or to your personal data to the following categories of recipients, who are by law or contract bound by confidentiality obligations:

<b>OUR THIRD-PARTY SERVICE PROVIDERS</b>
<b>LAW ENFORCEMENT AGENCIES, GOVERNMENT AUTHORITIES, COURTS OF LAW, OR THIRD PARTIES AS MAY BE REQUIRED BY LAW</b>
<b>ADVISORS, POTENTIAL TRANSACTIONAL PARTNERS OR OTHER THIRD PARTIES IN CONNECTION WITH THE CONSIDERATION, NEGOTIATION, OR COMPLETION OF A TRANSACTION IN WHICH WE ARE ACQUIRED BY OR MERGED WITH ANOTHER COMPANY OR WE SELL, LIQUIDATE, OR TRANSFER ALL OR A PORTION OF OUR ASSETS</b>

We may also share your personal data including equipment data with authorized Enervent service and maintenance partners in case you have given your consent for such disclosure.

We will not transfer your personal data outside the EU or EEA.

## 7 YOUR RIGHTS

### 7.1 Right of access

You have the right to receive a confirmation from us as to whether or not we process your personal data. When we do process such data, you have the right to gain access to your personal data and the following information (which are provided in this privacy policy):

<b>THE PURPOSES OF PROCESSING;</b>
<b>THE CATEGORIES OF PERSONAL DATA CONCERNED;</b>
<b>THE RECIPIENTS OR CATEGORIES OF RECIPIENTS TO WHOM PERSONAL DATA HAVE BEEN OR WILL BE DISCLOSED;</b>
<b>WHERE POSSIBLE, THE ENVISAGED PERIOD FOR WHICH PERSONAL DATA WILL BE STORED OR, IF NOT POSSIBLE THE CRITERIA USED TO DETERMINE THAT PERIOD;</b>

**THE EXISTENCE OF YOUR RIGHT TO REQUEST THE RECTIFICATION OR ERASURE OF PERSONAL DATA OR RESTRICTION OF PROCESSING OF PERSONAL DATA CONCERNING YOU, OR TO OBJECT SUCH PROCESSING;**

**THE RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY;**

**WHERE PERSONAL DATA IS NOT COLLECTED FROM YOU, ANY AVAILABLE INFORMATION AS TO THEIR SOURCE; AND**

**THE EXISTENCE OF AUTOMATED DECISION-MAKING.**

You have the right to receive a copy of the personal data undergoing processing as long as giving such copy does not adversely affect the rights and freedoms of others. For any further copies requested by you, we may charge a reasonable fee based on administrative costs.

## **7.2 Right to rectification**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your contact information changes.

You have the right to have your inaccurate personal data rectified by us without undue delay. You also have the right to have incomplete personal data completed.

We will communicate any rectification of your personal data to each recipient to whom we have disclosed your personal information unless this proves impossible or involves disproportionate effort. We will inform you about those recipients upon your request.

## **7.3 Right to erasure (right to be forgotten)**

You have the right to have your personal data erased by us without undue delay where one of the following grounds applies:

**THE PERSONAL DATA IS NO LONGER NECESSARY IN RELATION TO THE PURPOSES FOR WHICH THEY WERE COLLECTED OR OTHERWISE PROCESSED;**

**YOU WITHDRAW YOUR CONSENT ON WHICH THE PROCESSING IS BASED AND THERE IS NO OTHER LEGAL GROUND FOR THE PROCESSING;**

**YOU OBJECT TO THE PROCESSING AND THERE ARE NO OVERRIDING LEGITIMATE GROUNDS FOR THE PROCESSING;**

**YOUR PERSONAL DATA HAS BEEN UNLAWFULLY PROCESSED; OR**

**THE PERSONAL DATA HAS TO BE ERASED FOR COMPLIANCE WITH A LEGAL OBLIGATION TO WHICH WE ARE SUBJECT.**

Please note that the General Data Protection Regulation 679/2016 ("GDPR") recognizes situations where processing may be necessary regardless of the applicability of the abovementioned grounds. We will always inform you separately of such circumstances and our grounds for processing.

We will communicate any erasure of your personal data to each recipient to whom we have disclosed your personal information unless this proves impossible or involves disproportionate effort. We will inform you about those recipients upon your request.

#### **7.4 Right to restriction of processing**

You have the right to restrict the processing of your data in the following situations:

**YOU CONTEST THE ACCURACY OF THE PERSONAL DATA WE PROCESS AND AS A RESULT PROCESSING IS RESTRICTED WHILE THE ACCURACY IS VERIFIED;**

**THE PROCESSING IS UNLAWFUL, BUT YOU OPPOSE TO THE ERASURE OF THE PERSONAL DATA AND INSTEAD REQUEST US TO RESTRICT THEIR USE;**

**WE NO LONGER NEED THE PERSONAL DATA FOR THE PURPOSES OF THE PROCESSING PRESENTED IN THIS DOCUMENT, BUT THE DATA IS REQUIRED BY YOU FOR THE ESTABLISHMENT, EXERCISE, OR DEFENCE OF LEGAL CLAIMS; OR**

**YOU HAVE OBJECTED TO PROCESSING ON GROUNDS RELATING TO YOUR PARTICULAR SITUATION AND SUCH PROCESSING IS LEGALLY BASED ON OUR LEGITIMATE INTERESTS AS PRESENTED IN THIS DOCUMENT, AND AS A RESULT PROCESSING IS RESTRICTED WHILE IT IS VERIFIED WHETHER OUR LEGITIMATE GROUNDS OVERRIDE THOSE OF YOURS.**

If your processing has been restricted, we will inform you before the restriction is lifted.

We will communicate any restriction of processing to each recipient to whom we have disclosed your personal information unless this proves impossible or involves disproportionate effort. We will inform you about those recipients upon your request.

#### **7.5 Right to data portability**

You have the right to receive your personal data that you have provided to us, in a structured, commonly used and machine-readable format, and you have the right to transmit such data to another controller, when:

**WE PROCESS YOUR PERSONAL DATA BASED ON YOUR CONSENT; OR**

**WE PROCESS YOUR PERSONAL DATA BECAUSE IT IS NECESSARY FOR THE PERFORMANCE OF A CONTRACT TO WHICH YOU ARE A PARTY; AND**

**WE PROCESS SUCH PERSONAL DATA BY AUTOMATED MEANS; AND**



**THIS RIGHT DOES NOT ADVERSELY AFFECT THE RIGHTS AND FREEDOMS OF OTHERS.**

In the above situation, you also have the right to have your personal data transmitted directly from us to another controller, where that is technically feasible.

Please note that this right does not apply to derived or inferred data.

### **7.6 Right to object**

You have the right to object to processing of your personal data at any time on grounds relating to your particular situation, if we process your personal data based on our legitimate interests as presented in this document. After such objection, we will no longer process your personal data unless we demonstrate compelling legitimate grounds for the processing and these grounds override your interests, rights and freedoms, or unless we need them for the establishment, exercise or defense of legal claims.

You have the right, at any time, to refuse the storing of information or accessing to information stored on your mobile device where you have downloaded the App.

### **7.7 Right to withdraw your consent**

When we process your personal data based on your consent, you have the right to withdraw such consent at any time either by choosing different settings in the App, by deleting the App, or via email at [sonja.haggman@enervent.com](mailto:sonja.haggman@enervent.com). Once you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to and will delete such data, unless otherwise required by law.

### **7.8 Right to lodge a complaint**

In case you find that we do not comply with the GDPR, you have the right to lodge a complaint with a supervisory authority in the EU Member State of your habitual residence, place of work or of an alleged infringement of the GDPR. Please note that the Finnish supervisory authority is the Data Protection Office.

## **8 HOW TO EXERCISE YOUR RIGHTS AND CONTACT US**

We are happy to assist you in case you have any questions or concerns over the processing of your personal data or the exercise of your rights. In order for us to provide you with sufficient information and pragmatic advice, we ask you to send your requests, questions, or comments in writing to the contact person indicated above in section 2.

We may need to request specific information from you or ask you to visit our premises to help us confirm your identity. This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it.