# **Data Protection Policy**

## v. 20231228

The protection of your personal information is very important to us.

You will find details below about the collection of personal data when using the visualcomponents.com website. Personal data are all data that may relate to you personally, e.g. name, address, e-mail addresses, user behavior.

The "controller" as defined in Art. 4(7) of the EU General Data Protection Regulation (GDPR) is:

Visual Components Vänrikinkuja 2 02600 Espoo, Finland

## **Executive Board**

Mikko Urho Chief Executive Officer

Phone: +358 9 252 40 800

Further information can be found in our Imprint.

Our Data Protection Officer can be reached at <u>data-privacy@visualcomponents.com</u>.

#### Security

The Visual Components systems and websites are protected by technical and organizational security measures in order to prevent the loss, manipulation or destruction of your personal data and to avoid access to these data by unauthorized persons. Despite using industry standard Secure Sockets Layer (SSL) technology for encrypting the data transferred between you and our website, complete protection against all eventualities is not possible.

#### Disclosure of personal data

No personal data will be disclosed to third parties without your express permission. Data shall only be passed on to public bodies, law enforcement authorities and courts where there is a legal requirement to do so. Our employees are also obliged to secrecy and to treat the personal data you provide confidentially.

The third-party designation shall not apply to companies affiliated with Visual Components Oy, nor shall it apply to service providers contractually bound to us for contracted data processing.

# Collection, processing and use of personal data

# Use of Website

If you are using our website for purely informative purposes, i.e. if you are not registered or sending information to us in any other way, we collect only those personal data that your browser sends to our server. We require these data for technical purposes in order to display our website for you and to ensure the stability and security thereof. These data also enable us to purposefully improve our range of services. The legal basis for this is contained in Art. 6, para. 1, sentence 1(f) GDPR (legitimate interest).

This includes:

- Date and URL relating to the visitor's use of the website
- URL immediately prior to the visitor's access to the website
- IP address and domain from which the site was accessed
- The browser used
- The operating system used
- Technical information about the visit (http method, http version, http status code, length of the data transferred)

#### Product key order

When processing Product key orders and product registration, we collect the following personal information such as:

- Company
- Invoicing information of the company
- Order number
- Name
- E-mail address
- Workstation identifiers:
  - o Device Name
  - o System Model
  - o Operating System's Serial Number

To read out this information, we may provide you with a tool that only summarizes this data in a file, which you then send to us.

Which data is mandatory to indicate is specially marked in each case. Further information is voluntary.

The indication of your personal data serves the purpose of the conclusion of the contract and the completion of your order. The legal basis is Art. 6 Para. 1 S. 1 lit. b (GDPR).

## Use of cookies

Visual Components uses cookies in order to make its website more attractive and userfriendly. The legal basis for this is contained in Art. 6, para. 1, sentence 1(f) GDPR. Cookies are small text files which are stored on your device but do not contain a virus of any kind or cause any damage. Our website uses "session cookies". These cookies track your movements between the various pages of our website during a session so that you are not asked for the same information that you have already provided on our website. Closing and reopening the browser starts a new user session with a new cookie ID. "Global cookies" are also used. These measure the traffic of the website and identify the visitors and the session. These cookies are not deleted at the end of the session, but are replaced after a year.

You can prevent the saving of cookies using the appropriate browser settings. However, if you want to be able to use all the functions of our website, we do not recommend this.

## Visual Components' involvement in social media

Besides our website, Visual Components is present on various social media. We are currently represented on YouTube, LinkedIn, Facebook, X (former Twitter), and Instagram.

Please refer to the data privacy provisions of the relevant operator for the purpose and extent of the related data collection as well as the provisions for use of your data by the relevant platform.

- YouTube (Google): https://policies.google.com/privacy
- LinkedIn: <u>https://www.linkedin.com/legal/privacy-policy?trk=organization-guest\_footer-privacy-policy</u>
- Facebook: <u>https://www.facebook.com/privacy/explanation</u>
- X (former twitter): <u>https://twitter.com/de/privacy</u>
- Instagram: <u>https://help.instagram.com/155833707900388</u>

#### **Embedded content**

#### YouTube

This website uses plug-ins to display and play videos from the following provider: Google Ireland Limited, Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland

Data can also be transmitted to: Google LLC., USA

If you call up a page of our website that contains such a plug-in, your browser establishes a direct connection to the servers of the provider in order to load the plug-in. Certain information, including your IP address, is transmitted to the provider.

If the embedded videos are played via the plug-in, the provider also uses cookies to collect information about user behavior, compile playback statistics and prevent abusive behavior.

If you are logged into a user account from the provider during your page visit, your data will be directly assigned to your account when you click on a video. If you do not want data to be allocated to your account, you must log out before pushing the play button.

All of the aforementioned processing, in particular the setting of cookies for reading information on the end device used, will only be carried out if you have given us your express consent to do so in accordance with Art. 6(1)(a) GDPR by activating marketing cookies via the "cookie consent tool" provided on the website. You can withdraw your consent at any time with effect for the future by disabling marketing cookies via the "cookie consent tool" provided.

For the transfer of data to the United States, the provider has signed up to the EU-US Data Privacy Framework, which ensures compliance with the European level of data protection on the basis of an adequacy decision by the European Commission.

# Facebook

Plug-ins for the social network of the following provider are used on our website: Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland

These plug-ins enable direct interactions with content on the social network.

In order to increase the protection of your data when visiting our website, the plug-ins are initially disabled and are only integrated into the site if marketing cookies are selected.

Only upon enabling the marketing cookies and thus providing your consent to the transmission of data in accordance with Art. 6(1)(a) GDPR does your browser establish a direct connection to the provider's servers. Independent of a login to an existing user profile, information about your end device used (including your IP address), your browser and your page history is transmitted to the provider to a certain extent and further processed there if necessary.

If you are logged into an existing user profile on the provider's social network, information regarding interactions completed via the plug-ins will also be published there and your contacts will be displayed.

You can withdraw your consent at any time with effect for the future by disabling marketing cookies via the "cookie consent tool" provided on the website.

Data can also be transferred to: Meta Platforms Inc., USA

We have entered into an order processing agreement with the provider, which ensures the protection of the data of our website visitors and prohibits unauthorized disclosure to third parties.

For the transfer of data to the United States, the provider has signed up to the EU-US Data Privacy Framework, which ensures compliance with the European level of data protection on the basis of an adequacy decision by the European Commission.

# Internet advertising

We advertise on both our own website and non-affiliated websites. We do so using the information made available to us when you visit our website and make use of our content or services. This information is collected by means of cookies. After visiting the Visual Components website, you may therefore see advertisements for Visual Components on other websites in the form of banners.

The display of advertisements as a result of your activities on non-affiliated websites is not associated with your identity. We do not share any personal data with advertisers or other third parties that display our advertisements. Advertisers or other third parties (including advertising networks, ad serving companies and any other service providers contracted by such) may nevertheless assume that users who click on or interact with advertisements or content belong to the target group for the advertisements or content in question.

We currently use the following tools for Internet advertising. They function by using either cookies or pixels. The legal basis for this is contained in Art. 6, para. 1, sentence 1(f) GDPR.

For more detailed information on how the various tools work, please refer to the websites of the individual third-party providers:

- Google Tag Manager
- Facebook Pixel
- LinkedIn Insight Tag

# HubSpot

This website uses the software-based marketing service of the following provider for the provision and synchronization of various customer management services: HubSpot Ireland Ltd, 2nd Floor 30 North Wall Quay, Dublin 1, Ireland

The service enables the automated processing of feed activities, the control of advertising in marketing channels used and the success analysis of marketing measures as well as centralized e-mail marketing and contact management.

Cookies are used to perform the various functions, i.e. small text files that are stored locally in the cache of your web browser on your end device and enable us to analyze your use of the website. The cookies collect certain information, such as the IP address, the location and the time the page was accessed.

All processing described above, in particular the setting of cookies for reading information on the terminal device used, will only be carried out if you have given us your express consent to do so in accordance with Art. 6 para. 1 lit. a GDPR. You can revoke your consent at any time with effect for the future by deactivating this service in the "cookie consent tool" provided on the website.

Other legal bases for data processing that are used in the context of specific service functions (such as the need for express consent in accordance with Art. 6 para. 1 lit. a GDPR when sending newsletters) remain unaffected by this.

We have concluded an order processing contract with the provider, which ensures the protection of the data of our website visitors and prohibits unauthorized disclosure to third parties.

## Website analysis

## **Google Analytics 4**

This website uses Google Analytics 4, a web analytics service provided by Google Ireland Limited, Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland ("Google"), which enables your use of our website to be analyzed.

By default, Google Analytics sets 4 cookies when you visit the website, which are stored as small text modules on your end device and collect certain information. The scope of this information also includes your IP address, which, however, is shortened by Google by the last digits in order to exclude a direct personal reference.

The information is transferred to Google servers and processed there. Transmission to Google LLC, based in the USA, is also possible.

Google uses the information collected on our behalf to evaluate your use of the website, to compile reports on website activity for us and to provide us with other services relating to website activity and internet usage. The abbreviated IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data. The data collected as part of the use of Google Analytics 4 is stored for a period of two months and then deleted.

All processing described above, in particular the setting of cookies on the terminal device used, will only take place if you have given us your express consent to do so in accordance with Art. 6 para. 1 lit. a GDPR.

Without your consent, Google Analytics 4 will not be used during your visit to our website. You can withdraw your consent at any time with effect for the future. To exercise your right of withdrawal, please deactivate this service using the "cookie consent tool" provided on the website.

We have concluded a data processing agreement with Google that ensures the protection of the data of our website visitors and prohibits unauthorized disclosure to third parties.

Further legal information on Google Analytics 4 can be found at <u>https://policies.google.com/privacy</u> and at <u>https://policies.google.com/technologies/partner-sites</u>

# Demographic characteristics

Google Analytics 4 uses the special function "demographic characteristics" and can use it to create statistics that make statements about the age, gender and interests of site visitors. This is done by analyzing advertising and information from third-party providers. This allows target groups to be identified for marketing activities. However, the data collected cannot be assigned to a specific person and is deleted after being stored for a period of two months.

# Google Signals

As an extension to Google Analytics 4, Google Signals can be used on this website to generate cross-device reports. If you have activated personalized ads and linked your devices to your Google account, Google may, subject to your consent to the use of Google Analytics in accordance with Art. 6 para. 1 lit. a GDPR, analyze your usage behavior across devices and create database models, including cross-device conversions. We do not receive any personal data from Google, only statistics. If you wish to stop the cross-device analysis, you can deactivate the "Personalized advertising" function in the settings of your Google account. To do this, follow the instructions on this page:

https://support.google.com/ads/answer/2662922?hl=de You can find more information about Google Signals at the following link:

https://support.google.com/analytics/answer/7532985?hl=de

# UserIDs

As an extension to Google Analytics 4, the "UserIDs" function can be used on this website. If you have consented to the use of Google Analytics 4 in accordance with Art. 6 para. 1 lit. a GDPR, have set up an account on this website and log in with this account on different devices, your activities, including conversions, can be analyzed across devices.

For data transfers to the USA, the provider has joined the EU-US Data Privacy Framework, which ensures compliance with the European level of data protection on the basis of an adequacy decision by the European Commission.

# Mouseflow

This website uses Mouseflow, a web analytics tool from Mouseflow ApS, Flaesketorvet 68, 1711 Copenhagen, Denmark, to record randomly selected individual visits (with pseudonymized IP address only). A log of mouse movements and clicks is thus created with the intention of playing back individual website visits on a random basis and deriving potential improvements for the website from this. The processed information will not be passed on to third parties.

All forms of processing described above, in particular the setting of cookies for reading information on the end device used, will only be carried out if you have given us your express consent to do so in accordance with Art. 6(1)(a) GDPR. You can withdraw your consent at any time with effect for the future by disabling this service via the "Cookie settings" at <u>https://www.visualcomponents.com/</u>. Furthermore, you can globally opt out of

recording on all websites that use Mouseflow for the browser you are currently using at the following link: <u>https://mouseflow.de/opt-out/</u>

# Leadoo

We use Leadoo's tracking service to follow what users are doing on the site and combine this behavioral data with other data we can gather from e.g. chat interactions. Leadoo uses etag tracking in order to hook together the same users behavior over several sessions – in practice this works similarly to cookie based tracking. Please check out Leadoo Marketing Technologies Ltd's Privacy Policy (<u>https://leadoo.com/privacy-policy/</u>) for more information on what is tracked and what your rights are.

Leadoo works as the Processor and we work as the Controller for the data in terms of GDPR. All forms of processing described above will only be carried out if you have given us your express consent to do so in accordance with Art. 6(1)(a) GDPR. You can withdraw your consent at any time with effect for the future by disabling this service via the "Cookie settings".

You can also stop the tracking by emptying your browser's cache after the visit. For more on how Leadoo works as a GDPR compliant processor, see <u>https://leadoo.com/privacy-policy-processor/</u>

# Newsletter/press distribution list

Your e-mail address will only be used for sending the newsletter or press releases. You give us your express consent for sending the newsletter or press releases and the related processing of your personal data. The legal basis is contained in Art. 6, para. 1, sentence 1(a) GDPR.

You can withdraw this consent and unsubscribe from the newsletter or press distribution list at any time. Further information may be voluntarily provided: During registration for the press distribution list, you can optionally specify the media outlet, publisher, country and telephone number. During registration for the newsletter, you can optionally specify your title and company as well as your branch of industry and interests. This information helps us to adapt our offerings to your specialist requirements and interests.

Insofar as a form allows the entry of optional information (e.g. company, media outlet, job title, location or other contact details), such entries are entirely voluntary. Not providing optional information entails no disadvantages other than possible contact restrictions.

We use what is known as the double opt-in process to register for our newsletter. This means that we will send you an e-mail to the specified e-mail address after you have registered, in which we ask for confirmation that you wish to be sent the newsletter. If you do not confirm your registration within 48 hours, your personal data will be blocked and automatically erased after one month. We additionally save the IP addresses you have used and the registration and confirmation times. The purpose of this process is to be able to

provide proof of your registration and to clarify any possible misuse of your personal data. The legal basis for this is contained in Art. 6, para. 1, sentence 1(f) GDPR.

In the case of distribution of the newsletter, we evaluate your user behavior. For this evaluation, the e-mails that are sent contain so-called web beacons or tracking pixels, i.e. single-pixel image files that are saved on our website. For the purpose of evaluation, we link the data specified under "Collection, processing and use of personal data" and the web beacons with your e-mail address and an individual ID. We use the data thus acquired to create a user profile in order to tailor the newsletter to your specific interests. We receive information about when you read or forward our newsletter, which links you click on in it, and use this information to draw conclusions about your personal interests. We link these data with your actions on our website. We use these functions due to our justified interest in targeted advertising. The legal basis for this is contained in Art. 6 (1)(1)(f) GDPR.

You can withdraw your consent to this tracking at any time by unsubscribing from the newsletter.

## **Initiating contact**

## **E-mail and forms**

Upon filling out a form on our website or contacting us by e-mail, the data you have provided will only be used to process your request and will be treated confidentially at all times. If you contact us using our contact form, you must always specify your first and last name, your e-mail address and the country from which you are writing to us. You give us your express consent for processing these personal data for the purpose of handling your request. The legal basis is contained in Art. 6, para. 1, sentence 1(a) GDPR. You can withdraw this consent at any time.

We erase the data used for the purpose of establishing contact once storage is no longer required or restrict processing if there are statutory retention obligations.

# Links to third-party websites

Our website may contain links to external websites. At the time of setting the link, Visual Components satisfied itself that the linked pages do not contain illegal content of any kind. However, Visual Components cannot ensure continuous monitoring and has no influence whatsoever on the content of the linked websites. No liability will therefore be accepted for the content after the link has been set.

#### Your rights

You have the following rights from us in respect of your personal data:

- Right of access,
- Right to rectification or erasure,
- Right to object to processing,
- Right to restriction of processing,

• Right to data portability.

You can contact our Data Protection Officer free of charge at <u>data-</u> <u>privacy@visualcomponents.com</u> to assert these rights.

You also have the right to lodge a complaint with a data protection authority regarding our processing of your personal data.

## Time limits for erasure

We erase all personal data as soon as they are no longer required for the purpose that they have been collected for or you have exercised your right to erasure. Provided there are no statutory retention periods and none of the other exemptions specified in Art. 17, para. 3 GDPR applies, we will erase the data concerned as quickly as possible.

## **Contact person**

If you have any questions regarding the design or functions of the website, please contact: <u>data-privacy@visualcomponents.com</u>

## Reservation of the right of modification

The Visual Components Privacy Policy can be saved or printed at any time. Visual Components, however, reserves the right to adapt the Privacy Policy at any time, subject to data protection regulations, in order to cater for the ongoing further development of the website.