

## PRIVACY POLICY

### General

In order to give you the best possible service, we may need to collect and process certain personal data about you. However, we respect and value your privacy and we are committed to protect it. This privacy policy contains information about what personal data we collect, what are the key principles of processing the data and what rights you have relating to your personal data.

Prodiags Ltd and HMV-Systems Baltic Oü processes your personal data in compliance with this privacy policy and applicable laws, so we ask you to read this policy carefully. We may do updates to this privacy policy from time to time associated with development of our business operations or changes in applicable laws.

By using our services and website or contacting us, you accept that we process your personal data according to this privacy policy. If you do not accept these terms, it is likely that we cannot provide any services to you.

### For what purposes is personal data collected and used?

We collect, store and process your personal data only for predefined purposes. The main purposes for processing personal data are:

- access control and safeguarding of your account;
- managing learning;
- supporting customers;
- fulfilling our contractual obligations;
- fulfilling legal obligations and responding to legal claims;
- customer communications and responding to contact requests;
- development of our business; and
- targeting our services to you.

## What data you collect about me and from which sources?

We collect personal data about you mainly from yourself when you contact us or use our services.

In Prodiags learning environment we are also processing data of customer organizations (schools, businesses, etc.). The processing of data is confidential and is based on a contractual relationship with the controller of the register. The register information used by the customer organizations may differ from what we use in our own business. If you use the Prodiags system with a custom license, please consider the organization's privacy statement release. Organization specific Privacy Policy reports can be found also from Prodiags Personal Settings.

We also collect personal data about our website visitors with Google Analytics, so that we could analyze our website use, develop it further, and for targeting relevant marketing content for our customers and website visitors.

### Use of personal data

	Prodiags LMS	Prodiags Webshop	prodiags.com Contact Form	HMV-Systems Hotline	hmv-systems.fi Contact Form	Demo Moodle
Name	1	1	1	1	1	1
Title	2	2				
Email	1	1	1	1	1	1
UI language	1					
Phone	2	1		1	1	
Organization	2	2		1	2	
Occupation	2			2		
Address	2	1		1		2
VAT ID		2		1		
Team	2					
Contact person name	3	2				
Contact person email	3	2				
Contact person phone	3	2				
Contact person org.	3	2				

1 = Mandatory data; 2 = With your consent; 3 = With your contact person consent

## **What is the basis for processing your personal data?**

We make sure that we always have a legal basis to process your personal data. We may process your data on a several different basis. Firstly, we may process your data to fulfill and execute a contract and to meet legal obligations. Secondly, we may process your data also to further our legitimate interests, which are the offering of our services and operating and developing our business. Some personal data we may process based on your consent.

## **Who processes my personal data and is it transferred to anyone else?**

Primarily your personal data is processed by people within our own organization. We may also outsource some parts of the processing to third parties, such as the data systems used to store and process personal data. In these situations, we make sure with contracts and otherwise that the confidentiality of your personal data is secured and data is otherwise processed lawfully. We may also disclose information to fulfill our other contractual or legal obligations or when a legal authority requires a disclosure. We may also disclose your personal data if we are a party of a business sale, such as a merger or an acquisition.

## **Is my data transferred outside the EU?**

By default, your personal information will not be transferred to outsiders. The Prodiags LMS administrator can transfer the adult user with a common written agreement from the Prodiags group to another for example, when a student changes school. Provided both organizations have compatible versions of Prodiags.

All data processing is confidential.

## **How long is my data stored?**

We will not store your personal data for longer period than necessary for its purpose or required by contract or law. The storage times for personal data may vary based on its purpose and the situation. We also intend to keep your data with your help up to date.

## **How is my data stored and kept secure?**

Your data is stored on the servers provided by our service providers, which are secured according to general industry standards and practices. We consider and keep your personal data confidential and do not disclose them to anyone else than those who need it for their work or confidentially to our customers based on contracts we have made with them. Access to your personal data has been protected with user-specific logins, passwords and user rights.

The Data Center is locked and only to servers maintenance persons has access. Data transmission is protected by HTTPS protocol.

## **Is it mandatory to provide personal data? What happens if I don't give it to you?**

If you don't provide us some of your personal data or allow processing of it, it is very likely that we cannot serve you and fulfill the purpose of our business. If you don't want us to process your data, we ask you to not provide us any personal data.

All of our services have a "Forget Me" function that let's you send a request for deletion of your information at any time. The service interruption during the license does not entitle to the remaining royalty.

## **Does your website use cookies and what are those?**

Prodiags LMS and Hotline services do not use cookies.

Cookies are used only on our homepage so that we can provide the best user experience for a site visitor. Cookies are small text files that are placed on a web user's computer and are designed to hold a modest amount of data particular to a user and a website. Cookies give us information how users use our website. We may use cookies to develop our website and services, analyze website use as well as target and optimize marketing efforts. If you do not wish to receive cookies, you may set your web browser to disable them. Please note that most browsers accept cookies automatically. If you disable cookies, you should understand that certain services at our website may not function correctly.

We unfortunately cannot influence external sites, like Youtube, Vimeo, Moodle, etc. and their use of cookies.

## What rights do I have relating my personal data?

### Withdraw your consent

If we process personal data based on your consent, you can at anytime withdraw your consent by notifying us, for instance by sending email to support[at]prodiags.com.

### Access to data

You have the right to have confirmed if we are processing your personal data and also to know what data we have about you. In addition, you have right to some supplemental information described in the law about the processing activities.

### Right to have errors corrected

You have the right to request that we correct any inaccurate or outdated personal data we have about you.

### Right to prohibit direct marketing

You have the right to request that your personal data is not processed for direct marketing purposes by sending us email to sales[at]prodiags.com.

### Right to object processing

If we process your personal data based on public interest or our legitimate interest, you have the right to object processing of your data, to the extent that there is no such significant other reason that would override your rights or the processing is not necessary for handling legal claims. Please notice that in this situation we may not be able to serve you anymore.

### Right to restrict processing

In certain situations you have the right to require that we restrict processing of your personal data.

### Right to data portability

If we process your personal data based on your consent or fulfilling of a contract, you have the right to require transfer of the data you have provided to us to another services provider in a commonly used electronic format. From version Prodiags 5 on, you will export your personal data in CSV format. Function is found from "Study Register".

## How can I use my rights?

You can execute and use your rights by contacting us, for instance by sending eMail to support[at]prodiags.com. In such case, we ask you to provide us your name, contact details, phone number as well as a copy of a valid personal ID, such as a driver's license or passport, so we can verify your identity. If you consider that the processing of your personal data is not lawful, you can always also make a notification to a supervisory authority.

## **Can this privacy policy be updated?**

We may make updates to this privacy policy when our operations change or develop. Also changes in law may make it necessary to update this privacy policy. The changes become valid once we have published them in the form of an updated privacy policy. Therefore, please visit this page and read this privacy policy from time to time.

## **Who can I contact in privacy matters?**

Contact details:

Prodiags Ltd

Arto Aalto

+358 40 5555594

arto.aalto[at]prodiags.com