



DATA PROTECTION MANUAL

Privacy Policies

iLOQ Oy and its subsidiaries

Last Modified: 28 April 2026



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PRIVACY POLICY, EXTERNAL

iLOQ Oy's PRIVACY POLICY

DATA PROTECTION ACT (1050/2018) AND GDPR (679/2016) ARTICLES 13, 14 AND 30

1) CONTROLLER

Name: iLOQ Oy

Business ID: 1842821-6

Address: Elektroniikkatie 10, 90590 OULU

In this Privacy Policy the controller may also be referred to as "we".

2) PERSON IN CHARGE

Name: Jaana Klinga

Phone: +358 44 435 2403

Email: jaana.klinga@iloq.com

3) THE CATEGORIES OF DATA SUBJECTS

iLOQ Oy's Privacy Policy concerns the following categories of data subjects:

3.1) persons who contact iLOQ Oy via email or through the service:

3.2) contact persons of iLOQ Oy's customers, suppliers or partners;

3.3) persons seek employment from iLOQ Oy.

In this Privacy Policy data subjects may also be referred to as "you" and "them".

4) THE CATEGORIES OF PERSONAL DATA

The data processed of the data subjects of Sections 3.1) – 3.3) may include the following categories of personal data:

- contact information, such as full name, address, phone numbers and e-mail addresses;
- possible other information gathered with the data subject's consent.

The data processed of the data subjects of Section 3.1) may also include the following categories of personal data:

- data about your device, such as information about the device you use: type of your device, your IP-address and various diagnostic data;



- user information, such as username, password and other unique identification browsing, search information and other information concerning your use of our services.

The data processed of the data subjects of Section 3.2) may also include the following categories of personal data:

- information regarding the customer relationship, such as billing and payment information, product-, service- and ordering information, information regarding customer feedback, contacts and cancellation.

The data processed of the data subjects of Section 3.3) may also include the following categories of personal data:

- nationality, age, gender, title or profession and mother tongue;
- work background and photo.

5) PURPOSE OF THE PROCESSING OF PERSONAL DATA

Personal data of the data subjects of Sections 3.1) – 3.3) can be handled for following purposes:

- customer service;
- improving our user experience;
- analysis and statistics;
- to enable us to comply with our legal and regulatory obligations.

Personal data of the data subjects of Sections 3.1) and 3.2) can also be handled for following purposes:

- management and development of the customer relationship;
- marketing, market surveys and studies;
- exchanging contact information.

Personal data of the data subjects of Section 3.3) can also be handled for following purposes:

- management and development of the jobseeker relationships

Personal data can also be processed by iLOQ Oy's Finnish affiliate companies, if any, in accordance with the GDPR and the Finnish Data Protection Act.

6) LEGAL BASIS FOR PROCESSING

The controller has the right to process the personal data of the data subjects based on the:

- consent received from the data subjects;
- performance of a contract to which the data subject is party;
- the legitimate interest of the controller;



- legal obligation to which the controller is subject.

The controller processes personal data of data subjects in Sections 3.1) and 3.2) based on its legitimate interest in promoting products and services and developing business relationships. Using basic contact information (such as name, work email, work phone number, job title and company) is necessary to identify and contact relevant individuals and to communicate marketing information in a proportionate manner. The controller has balanced its interests against the rights of the data subjects by limiting processing to professional contact data in a manner it does not consider having an undue impact on the data subjects.

7) REGULAR SOURCES OF INFORMATION

Information regarding the data subjects are regularly gathered:

- from data subjects themselves via phone, internet, e-mail or in other similar fashion;
- third party sources (such as LinkedIn) enriching personal data of data subjects in Sections 3.1) and 3.2);
- with cookies and other similar tech;
- CVs and application letters;
- referrals.

8) PERIOD FOR WHICH THE PERSONAL DATA WILL BE STORED

The controller shall not store the personal data longer than is necessary, taking into consideration the purpose for the processing of personal data.

- Customer and contact person data will be stored until they are **no longer useful** or the data subject **asks for its removal**.
- Data on job applicants **is not stored without their consent**. With their consent the data will be stored for **6 months**, after which it will be destroyed.

The controller inspects the necessity of the personal data stored on a monthly basis.

9) CATEGORIES OF RECIPIENTS OF PERSONAL DATA

The recipients of personal data may consist of the following categories:

- iLOQ Oy's affiliate companies;
- third parties who offer cloud services;
- third parties who offer accounting, recruiting, marketing and auditing services;
- third parties who help iLOQ Oy to fulfill its legal obligations.

Information concerning data subjects may be disclosed with the data subject's consent for marketing purposes in accordance with the Finnish Data Protection Act and the GDPR.



Contact information concerning data subjects may be disclosed to third parties in accordance with the Finnish Data Protection Act and the GDPR.

10) REGULAR DISCLOSURE OF DATA AND INFORMATION TRANSFER OUTSIDE OF EU OR THE EUROPEAN ECONOMIC AREA

Information may be transferred and stored to a server outside of EU or the European Economic Area to be processed by the controller or controller's affiliate on controller's behalf in accordance with the GDPR and the Finnish Data Protection Act.

11) DATA SUBJECTS' RIGHTS

The data subject has a right to use all of the below mentioned rights.

The contacts concerning the rights shall be submitted to the person stated in Section 2. The rights of the data subject can be put into action only when the data subject has been satisfactorily identified.

Right to inspect

Having presented the adequate and necessary information, the data subject has the right to know what, if any, data the controller processes of her/him. While providing the requested information to the data subject, the controller must also inform the data subject of the regular sources of information, to what are the personal data used for and where is it regularly disclosed to.

Right to rectify and erasure

The data subject has a right to request the controller to rectify the inaccurate and incomplete personal data concerning the data subject.

The data subject can request the controller to erase the personal data concerning the data subject, if:

- the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
- the data subject withdraws consent on which the processing is based on;
- the personal data has been unlawfully processed; or
- the personal data has to be erased for compliance with a legal obligation in EU or Member State law to which the controller is subject to.

If the controller does not accept the data subject's request to rectify or erase the personal data, it must give a decision of the matter to the data subject in a written form. The decision must include the reasons for which the request was not granted. The data subject may then refer the matter to the relevant authorities (Data Protection Ombudsman).



The controller must inform the party to whom the controller has disclosed the personal data to or has received the personal data from of the rectification or erasure of personal data. However, there is no such obligation where the fulfilment of the obligation would be practically impossible or otherwise unreasonable.

Right to restriction of processing

The data subject can request the controller to restrict the processing of the personal data concerning the data subject where one of the following applies:

- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead; or
- the controller no longer needs the personal data for the purposes of the processing, but the personal data is required by the data subject for the establishment, exercise or defense of legal claims.

If the controller has based the restriction of the processing of personal data on the abovementioned criteria, the controller shall give a notification to the data subject before removing the restriction.

Right to object

Where personal data is processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning her/him for such marketing, which includes profiling to the extent that it is related to such direct marketing.

Right to data portability

The data subject shall have the right to receive the personal data concerning her/him, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data has been provided.

Right to withdraw consent

Where the legal basis for the processing of personal data is the consent of the data subject, the data subject shall have the right to withdraw her/his consent.

12) RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

The data subject shall have the right to lodge a complaint with a supervisory authority, if the data subject considers that the processing of personal data relating to him or her infringes the GDPR. The complaint can be lodged in the Member State of her/his habitual residence, place of work or place of the alleged infringement.



13) MERGERS AND ACQUISITIONS

In connection with mergers, acquisitions or divestiture of all parts of iLOQ Oy's business, the acquiring entity, as well as its business partners will obtain access to data managed by iLOQ Oy, and this may include personal data. In the aforementioned case, such external parties will enter into a non-disclosure agreement with iLOQ Oy, which covers the potential disclosure of personal data.

14) DATA PROTECTION PRINCIPLES

iLOQ Oy uses all reasonable efforts to maintain physical, electronic, and administrative safeguards to protect personal information from unauthorized or inappropriate access, but iLOQ Oy notes that the Internet is not always a secure medium. iLOQ Oy restricts access to information about data subjects only to the personnel of iLOQ Oy that need to know the information e.g. for responding to inquiries or requests made by the data subjects.

CHANGE HISTORY

Revision	Date (YYYY-MM-DD)	Author	Reviewed and/or approved
0.1	2022-10-12	H. Leskinen	First draft (policies for the same documents)
1.0	2022-10-12	H. Leskinen	For approval (by T. Ainali)
1.1	2023-03-03	H. Leskinen	Person in charge changed
2.0	2023-03-03	H. Leskinen	For approval (by T. Ainali)
2.1	2023-11-23	T. Ainali, M-K Kuoppala, H. Ahola, J. Koivula, T. Lappi, T. Karhu, H. Leskinen	Introduction chapter added, policies updated and reviewed
2.2	2023-12-01	T. Ainali, M-K Kuoppala, H. Ahola, J. Koivula, T. Lappi, T. Karhu, H. Leskinen	Policies updated and reviewed
2.3	2023-12-12	Leadership Team E. Sankari, V. Tolvanen, H. Hiltunen, J. Klinga, J. Lampinen, M. Tuomikoski, T. Thörewik, T. Ainali, T. Pirskanen, T. Karjalainen	Reviewed by Leadership Team

Revision	Date (YYYY-MM-DD)	Author	Reviewed and/or approved
3.0	2023-12-12	Leadership Team E. Sankari, V. Tolvanen, H. Hiltunen, J. Klinga, J. Lampinen, M. Tuomikoski, T. Thörewik, T. Ainali, T. Pirskanen, T. Karjalainen	Approved by Leadership Team
3.1	2024-03-28	H. Ahola, MK Kuoppala, J. Koivula, H. Leskinen	Policy reviewed from cyber security point of view. Cyber security added to headline.
3.2	2024-09-26	H. Leskinen	Std and objective references added to information security policy
4.0	2024-11-11	Leadership Team	Reviewed and approved to the presented to the Finance and Audit Committee and thereafter to the Board for approval.
5.0	4th December 2024	Leadership Team	Reviewed and Approved
5.1	2025-04-29	H. Leskinen	Information security policies moved to another document
6.0	25 th June 2025	Leadership Team	Reviewed and Approved
7.0	8 th August 2025	Board	Approved
8.0	28 th April 2026	Leadership Team	Reviewed and approved