

## Privacy Policy / Trustmary USA Inc.

Trustmary USA Inc. operates on <https://business.trustmary.com>. This document informs you of our policies regarding the collection, use and disclosure of Personal Information we receive from users of this website.

### Information Collection and Use

#### Personal Information

While using our Site, we may ask you to provide us with certain personally identifiable information that can be used to contact or to identify you. Personal Information refers to the information that you voluntarily provide us, such as your name, e-mail address, phone number and company name.

From time to time, we may receive Personal Information about you from third party sources, including partners with which we engage in joint marketing activities and publicly available sources, such as social media websites.

We use Personal Information to

- a) improve your browsing experience by personalizing the website
- b) contact you with newsletters, marketing or promotional materials or other content which we think may be of interest to you - in accordance of your communication preferences
- c) send information to you regarding changes to our Privacy Policy or Customer Terms of Service

#### Log Data

We collect information that your browser sends us whenever you visit our website. Log Data refers to the information about your visits to this website, such as your IP address, geographical location, browser type, referral source, length of visit and pages viewed. This information is used to maintain the quality of, to improve and to provide general statistics of the website.

#### Cookies

Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your computer's hard drive. We use cookies to collect information and to improve our website. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of the website.

#### Children

The website is not intended or targeted at children under 16. We do not knowingly or intentionally collect information about children under 16. If you believe that we have collected information about a child under 16, please contact us at [kepa@trustmary.com](mailto:kepa@trustmary.com) so that we may delete the information.

## Legal basis for processing information (EEA visitors)

Our legal basis for collecting and using the Personal Information described above will depend on the personal information concerned and the specific context in which we collect it.

We will normally collect Personal Information from you only:

- a) where we have your consent to do so
- b) where we need the Personal Information to perform a contract with you or
- c) where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms.

## Security

The security of your Personal Information is important to us. We use a variety of security technologies and procedures to help protect your Personal Information from unauthorized access, use or disclosure.

We secure the Personal Information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure.

## Retention of Personal Information

How long we keep information we collect about you depends on the type of information.

- a) We retain Personal Information that you provide to us where we have an ongoing legitimate business need to do so. For example, for as long as it is required to contact you about our services or needed to comply with our legal obligations.
- b) When we have no ongoing legitimate business needs to process your Personal Information, we securely delete the information or anonymize it. We will delete this information from the servers at an earlier date if you so request, as described in "How to access and control your personal data".
- c) If you have elected to receive marketing communications from us, we retain information about your marketing preferences for a reasonable period of time from the date you last expressed interest in our content, product or services, such as when you last opened an email from us. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created.

## How we share information

We never sell your Personal Information to any third party.

We may use trusted third parties or software to process information related to customer success management (such as cloud storage services, project management and communications tools) or technical support. They are required to maintain the confidentiality of your information.

We reserve the right to use or disclose your Personal Information if required by law or if we reasonably believe that use or disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or comply with a law, court order or legal process.

## **International Transfer of Information**

Some of the third parties which provide services to us under contract may be based outside the European Union or the European Economic Area. In such cases, we require that the partner has certified its compliance with the EU-U.S. Privacy Shield Framework or make use of the standard contractual data protection clauses approved by the European Commission, binding corporate rules for transfers to data processors, or other appropriate legal mechanisms to safeguard the transfer.

## **How to access and control your personal data**

You have the following data protection rights:

- a) You can request access, correction, updates or deletion of your Personal Information.
- b) You can object to processing of your Personal Information, ask us to restrict processing of your Personal Information or request portability of your Personal Information.
- c) If we have collected and process your Personal Information with your consent, you can withdraw your consent at any time.
- d) You have the right to complain to a data protection authority about our collection and use of your personal information.

## **To unsubscribe from our communications**

You may unsubscribe from our marketing communications by clicking on the "unsubscribe" link located on the bottom of our emails, updating your communication preferences, or by sending an email to [kepa@trustmary.com](mailto:kepa@trustmary.com).

*This privacy policy has been updated on 5.2.2018.*

*For any questions, please contact:*

*Kepa Eskelinen  
Data Protection Officer  
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+358 40 5574565*