## **Project-TOP Solutions Privacy Policy**

Effective Date 1.12.2015.

This is the Privacy Policy of Project-TOP Solutions Oy ("ProjectTOP") applicable to all websites operated by ProjectTOP. Some websites, web pages or services of ProjectTOP may be subject to specific terms of use. In this case the Privacy Policy constitutes an integral part of such terms; however, should any contradictions occur, such terms shall prevail over this Privacy Policy. In the following by user (the "User") is meant any individual user of the websites and thereto related services of ProjectTOP, and any legal entity represented by such individual user.

The User agrees to be bound by this Privacy Policy, as amended from time to time, by visiting and/or using the websites of ProjectTOP or by registering and disclosing personal information to ProjectTOP in connection with its web pages or services. Any use or disclosure may take place only if the User agrees to this Privacy Policy in its entirety.

ProjectTOP respects the privacy of the User and commits itself to observe the applicable laws and statutes of Finland and the European Union relating to privacy as well as principles expressed in this Privacy Policy. ProjectTOP is the controller of the personal data for the purposes of the Finnish Personal Data Act (Henkilötietolaki).

## Use of data

1. **Personal data.** In general the websites of ProjectTOP can be browsed without providing any personal data about the User. When the User opts to use or purchase the services provided by ProjectTOP or to otherwise register at the website of ProjectTOP providing of certain contact and identity information, billing information and other personal data will be required.

ProjectTOP will hold and process any personal data which the User provides via the websites or by submitting emails and/or online forms for its own internal business purposes. ProjectTOP shall not pass on or sell online personal data to third parties. ProjectTOP may however share data within its organization. This may include ProjectTOP's employees, agents, contractors and sub-contractors and the use of third party systems to process such data. ProjectTOP may use email address or other contact information for queries and other contacts in relation to development and improvement of its services as well as for marketing of its own services to the User.

ProjectTOP may also send proposals and offers based on the usage statistic of the User in a responsible manner.

By sending personal data to ProjectTOP the User is explicitly consenting to the processing and transfer of such data in ways described above. ProjectTOP cannot be responsible for personal data which the User uploads and shares between other users of the services of ProjectTOP. The User and the users of the shared information are responsible to maintain applicable statutory privacy.

- 2. **Cookies.** ProjectTOP may place in your computer information in the form of a text file known commonly as a "cookie". A cookie may enable collection of certain information about the computer of the User, including the internet protocol (IP) address, the computer's operating system, the browser type and the address of any referring sites. The use of cookies is intended to provide benefits to the User, such as eliminating the need to enter password frequently during a session. Cookies are also used for website traffic analysis and anonymous demographic profiling in order to improve services of ProjectTOP.
- 3. Aggregated Data. ProjectTOP may use anonymized data obtained via the User's visits to websites of ProjectTOP and/or directly disclosed there by the User in order to improve and develop the websites and services of ProjectTOP and to produce aggregated sales information and other statistics.

- 4. Security. ProjectTOP takes appropriate technical and organizational information security measures to prevent and minimize risks. There are always risks associated with data transmissions over the internet, and for that reason ProjectTOP cannot warrant the security of the data you transmit to us. ProjectTOP strives to protect any personal data.
- 5. Amendments. ProjectTOP may change or modify this Privacy Policy in its sole discretion. ProjectTOP shall inform the User about any major changes adversary to the User by posting a notice of that at: www.projecttop.fi at least 20 days before such amendment. Such changes become effective upon posting them at: www.projecttop.fi after this period has elapsed. Other changes become effective immediately upon posting them at the mentioned web address. The continued use of the websites of ProjectTOP after any changes or modifications constitutes the User's acceptance to such. The User should review the most current version of the Privacy Policy at the above-mentioned web address regularly.
- 6. **Applicable Law.** This Privacy Policy shall be construed, governed and enforced in accordance with the laws of Finland without giving effect to any principle of law which would result in the application of laws of any other jurisdiction, and irrespective whether the websites of ProjectTOP have been accessed from Finland or abroad. Helsinki District Court, Finland (Helsingin käräjäoikeus) shall have exclusive jurisdiction over any dispute arising out of use or non-use of the websites of the ProjectTOP.
- 7. **User Rights.** Nothing in this Privacy Policy shall limit the statutory rights of the User to check, delete or correct any personal data as provided by the Personal Data Act. This can be done by using the contact information below. In case personal data of a User is removed ProjectTOP may not be able to continue to provide services to that User. Any questions concerning Privacy Policy may be sent to ProjectTOP by email to address:

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