



PRIVACY POLICY AND DATA FILE DESCRIPTION

Valid since October 1st 2016. For latest privacy policy document, see www.remuc.com/privacy

Suomen henkilötietolaki (532/1999), Section 10

This file description is applied to the processing of the personal data collected through website www.remuc.com and through usage of Remuc-product.

Embelin Oy reserves the right on alter and amend this file description. Embelin Oy will notify you of substantial amendments via email, if you have given such address. You shall be responsible for keeping your contact information up to date. By continuing service use after receiving amendment notification is deemed as your acceptance.

1 DATA CONTROLLER

Embelin Oy

Tullivahdinkatu 1 C 1

90120 OULU

info@embelin.fi

010 3284 100

2 PERSON IN CHARGE FOR FILE MATTERS

Teemu Laukkarinen

teemu.laukkarinen@embelin.fi

3 NAME OF THE PERSONAL DATA FILE

The name of the personal data file is: "Remuc customer data register"

4 PURPOSE OF PERSONAL DATA PROCESSING

The purpose of the processing of personal data is to deliver services and manage customer relations between Embelin Oy and its customers. Personal data is used for initiating service, managing orders, invoicing and when delivering data and notifications to customers. Furthermore, the personal data may be used in investigation and monitoring in cases of suspected misuse. The personal data may also be used when planning and developing Embelin Oy business and services.

5 CONTENTS OF THE DATA FILE

The personal data file contains partially or all of the following information:

Customer information:

First and last name (company name), phone number, email address and other optional information provided by customer herself.

Use information:

Collected use information depends on the Customer Service level. Service levels are described in more detail in "Terms of web and mobile services" document (www.remuc.com/tos). Basic, Positioning and Driver's Log level information cannot be linked to customer without their personal consent (giving out device id/QR code). In case of FMS, the customer information is saved when creating the service account

Basic features level

All device status and event information from past 7 days.

Positioning level

In addition to basic service contents, device positioning information

Driver's Log level

Basic features and Positioning level features are collected from the activation moment. Information is archived for at least 5 years

Fleet/FMS service

In addition to Driver's Log level, device and user identification and grouping information. Information is archived for at least 5 years.

6 REGULAR SOURCES OF INFORMATION

The personal data is added to this register when customer acquires services or other products from Embelin Oy. Remuc information uploads to Embelin server when device is connected to mobile data network. Remuc information is not linked to customer without their consent.

7 REGULAR DISCLOSURE OF PERSONAL DATA

Embelin Oy does not disclose data register's data to any third parties on a regular basis unless a serious unlawful activity is suspected.

Embelin Oy has the right to use subcontractors in connection with service offering and execution, and in this context personal data may be transferred on a third party to the extent that is necessary to fulfill service requirements.

Personal data file will not be transferred outside EU or EEA.

8 CORRECTNESS OF DATA

Embelin Oy does not verify customer data correctness. Customer has the right to alter or delete her information by contacting the mentioned in section 2. Remuc functionality does, however, require saving the information to server.

9 SECURITY OF THE PERSONAL DATA FILE

Embelin Oy and personnel required to process the register data are obliged to withhold Customer's service use habits and communication contents. Embelin Oy will not hand out any such information to third parties unless legally required to do so. All data contained in the customer data register are protected in accordance with general industry practice.

10 FURTHER INFORMATION

Should you have any questions relating to this personal data file description, contact the person in section 2.