# **Privacy Policy**

By using the Cloudpoint Itd ('Cloudpoint'), services (the 'Service'), you accept the following privacy policy (the "Privacy Policy").

You are also aware of our Terms of Service, found above. Using the Service is governed also by the Terms of Service (the 'TOS').

Cloudpoint is committed to protecting your privacy. This Privacy Policy describes how Cloudpoint collects and receives personal information, how Cloudpoint uses the personal information and how Cloudpoint may share the personal information that it collects and receives. Personal information is information about you that is personally identifiable like your name or email address.

# How Service Provider collects and uses your personal information

Cloudpoint collects your personal information (such as name, user name and email-address) when you start using the Service.

By using the Service or by otherwise disclosing your personal information to us, you also accept and give your explicit consent that your personal information may be transferred to, to the maximum extent permitted by applicable laws, across international borders to a location outside the country of your location. Based on technical or practical measures, the information can also be stored on the servers of other service providers contracted by Cloudpoint Ltd, or these contractors can handle the information for Cloudpoint Ltd. This can also mean transfer of the information outside the EU and EEA area. These contractors comply with data privacy and security requirements set by Cloudpoint and Finnish Personal Data Act.

In addition to the personal information you may provide to Service Provider, the Service may also use various technologies to collect non-personal user information on the users of the Service (such as usage volumes, when the Service is used, which parts of the Service have been used, geographic user data, errors in normal functionalities etc.).

Cloudpoint uses information collected by or through the Service for the following purposes:

- customer relationship management,
- maintenance, development and upkeep of services,
- research, anonymous reporting,
- contacting users if needed,
- offering and marketing of products and services

## **How Service Provider shares your personal information**

Generally, Cloudpoint does not pass your personal information to any other parties than other group companies without your pre-authorization, where the exceptions include, for the delivery of the ordered products and services and the following cases:

- Cloudpoint may be required to disclose personally identifiable information under special circumstances, such as to comply with legal requirements or to exercise its legal rights;
- It may be necessary to share information in order to investigate, prevent, or take action regarding suspected or actual illegal activities on or through the Service, including but not limited to violations of the Terms of Service, or as otherwise permitted or required by applicable laws:
- Cloudpoint may share aggregated demographic information with its business partners. This information does not identify single users.

# **Modification of this Privacy Policy**

You understand that Service Provider is continuously developing the features and the functionality of the Service. Consequently, Service Provider also reserves the right to modify this Privacy Policy at any time in our sole discretion. You agree that such alteration shall be effective upon posting on the Service and you will be bound to any alterations when you use the Service after such alteration is posted. It is therefore important that you review this Privacy Policy regularly on the Service to ensure you are updated regarding any alterations. Your sole remedy should you not agree with the altered Privacy Policy shall be to cease using the Service. If you have questions or suggestions, or would like to review your personal information stored by us, please contact us at: info@Cloudpoint.fi.

# **Register description**

Register description (Finnish Personal Data Act (523/1999) 10 §)

## 1. Registrar

Cloudpoint Ltd

Lemuntie 7

00510 HELSINKI

Finland

email: info@Cloudpoint.fi

VAT: FI23257036

#### 2. Register name

Nomen data register

### 3. Purpose of handling personal data

User information is collected for technical management, implementation and development of services.

### 4. Contents of the register

The user register for the Cloudpoint contains the following data:

- User E-mail address
- Google User ID
- Full name
- Phone number
- School name
- School ID
- Class
- Course
- Encrypted social security number

#### 5. Regular sources of information

Information comes from a student management database.

#### 6. Accuracy of information

Accuracy of information is not verified.

#### 7. Disclosure of Information

Personal data shall not be relinquished to third parties except as within the permitted or obligated limits of the valid legislation. Information may be disclosed anonymously to purposes of scientists. Personal data may be transferred outside the European Union or the European Economic Area permitted limits of Personal Data Act.

#### 8. Register protection principles

Register is located in Google Cloud Platform. Stored information is collected in databases which are protected and encrypted with different technical means. Only employees of Cloudpoint that has rights to deal with user information can access the register.