





Privacy police notice

Enforcement date is May 25 2018

This privacy police notice states:

- Citynomadi's contact information
- what are the purpose and basis for the processing of personal data for the Premium subscriber register, meaning the company and organization customers
- what are the purpose and basis for the processing of personal data for the Community subscriber register, meaning the individual customers
- what are the purposes and basis for the processing of personal data for the B2B customer register
- Citynomadi's role as a personal data processor
- what are the purposes for the use of personal data collected by Citynomadi
- how does Citynomadi carry out the information security of its services
- how does Citynomadi possibly disclose the personal data
- what are the rights of the subscribers and legal entities
- whether Citynomadi transfers data outside of the EU/EEA
- how Citynomadi may modify this notice.

Depending on the section, this Privacy notice may apply to individuals, companies, public sector organization, or all of them.

Citynomadi complies with the data protection legislation in force for all processing of personal data, such as the EU General Data Protection Regulation (GDPR), European Union's General Data Protection Regulation (EU) 2016/679, the Finnish Data Protection Act and the Act on Electronic Communications Services 2014/917.

Registrar's details

Citynomadi Oy (Business ID FI22408461)
Aleksis Kiven katu 20 A
33210 Tampere

Data protection officer

Sami Karhumäki
Citynomadi Oy
Aleksis Kiven katu 20 A
33210 Tampere
sami.karhumaki at citynomadi.com

The purpose and basis for processing personal data

The personal data collected by Citynomadi, the purpose of processing of personal data, the legal grounds for processing and the disclosure of data are described register specific below.

[citynomadi.com](#) service

Nomadi app and the white label apps accordingly, [citynomadi.com](#) site and the register that links these together belong to the [citynomadi.com](#) service. This privacy police notice describes those entities.



Subscriber register - Premium

The personal data collected in *the Premium subscriber* register:

- Business, public sector or organization name
- postal address
- names of contact individuals
- title of of contact individuals
- work email addresses of contact individuals
- work phone number of contact individuals.

Citynomadi's Premium subscriber register contains contact information of the company and organization clients. The basic information contained in the register is the subscriber's contact information, i.e. the name, address and telephone number of the company or organization. Also, it contains the names, work email and work phone number of the individuals that are the contacts for the company or organization. Citynomadi gets the information while signing the contract.

While signing in as the Premium subscriber, an individual does not automatically register to citynomadi.com user. In order to do that the subscriber creates the credentials at citynomadi.com site when needed and give the personal data according to the Community subscriber register (see below).

While a Premium subscriber is willing to erase the personal data from Citynomadi's subscriber register, he / she must contact the employer's main user in the first hand, who will contact Citynomadi's data protection officer.

Subscriber register - Community

The personal data collected in *the Community subscriber* register:

- username
- email address.

Citynomadi's Community subscriber register contains contact information of the individual clients. The basic information contained in the register is the subscriber's username and contact information, which is email-address. While signing in as Community subscriber, an individual will be automatically registered to citynomadi.com user.

While a Community subscriber is willing to erase the personal data from Citynomadi's subscriber register, he / she must contact Citynomadi's data protection officer in the first hand.

B2B customer register - B2B

The personal data collected in the Citynomadi's *B2B customer register*:

- business, public sector entity or organization name
- name of contact individual
- title of of contact individual
- work email address of contact individual
- work phone number of contact individual.

The register is composed of contacts for legal entities, such as companies, public sector entities, associations, and foundations.



Purpose of use of the personal data

Personal data are processed for the maintenance, management and development, analysis, statistics of B2B customer relationships related to Citynomadi's services as well as the provision, delivery and development of better customer experience of services. Personal data is used only to maintain the Premium service of citynomadi.com.

Customer information may be used for the direct advertising, distance selling or other direct marketing, questionnaires or market research or other similar transmission and targeting the online marketing of Citynomadi.

Legal basis for processing of personal data

The processing of personal data is used only for the purposes of this Privacy notice.

The data subject is able to prohibit the use of the personal data by informing and sending an email to the data protection officer or by unsubscribing the newsletter.

Personal data and citynomadi.com service

Anyone is able to use citynomadi.com -site and Nomadi app without registration anonymously. While an individual is willing to create the credentials and become a Community subscriber, he / she will join the Community subscriber register.

Retention of the personal data

The personal data will be retained at least for the duration of the customer relationship and for 5 years, after which the details relating to the customer relationship are deleted unless requirements processing of personal data.

Minors

Citynomadi's policy is to request that "Minors" do not make purchases or engage in other legal acts on this citynomadi.com service without the consent of a parent or legal guardian.

Copyright

The Premium subscribers of ours publish information and interact in Citynomadi's location based service. They need to have a copyright for all of the content on their routes or map entities. The Premium subscribers administer their routes, in the other words they are responsible for the content, accuracy, reliability, timeliness, relevance and have produced the content on the Citynomadi maps, or, if not, have the copyright for the content. In case there will be open source data or IoT feed information on the maps, they will be treated according to the conditions of given data provider.

The Premium subscribers of Citynomadi administer all their content and the route entities on the entire citynomadi.com service, that is citynomadi.com -site, embedded maps, Nomadi app and white label apps.

The Community subscribers of ours publish information in Citynomadi's location based service. The Community subscribers administer their routes, in other words they are responsible for the content, accuracy, reliability, timeliness, relevance and own rights for the content on their Citynomadi content on the maps, or, if not, have the copyright for the content.



Usage of cookies

From time to time, information may be placed on your computer to improve this citynomadi.com service for you. This information is commonly referred to as a "cookie", which many web sites use. Cookies are pieces of data stored on your computer's hard drive or browser. They typically enable collection of certain information about your computer, including your internet protocol address, your computer's operating system, your browser type and the address of any referring sites.

The use of cookies provides benefits to you, such as eliminating the need for you to enter your password frequently during a session, or, where applicable, re-enter items you place in a shopping cart from visit to visit if you do not finish a transaction on an earlier visit. By showing how and when our visitors use this citynomadi.com, the use of cookies allows Citynomadi to continue to improve citynomadi.com.

If you do not wish to receive cookies, or want to be notified of when they are placed, you may set your web browser to do so, if your browser so permits. Please understand that if cookies are turned off, you may not be able to view certain parts of citynomadi.com that may enhance your visit. Some of our business partners whose content is linked to or from this citynomadi.com may also use cookies. However, we have no access to or control over these cookies. This citynomadi.com also makes use of cookies for website traffic analysis and anonymous profiling.

Security

Citynomadi has endeavoured to take commercially reasonable measures to prevent unauthorized access to and improper use of your Personal Data submitted to Citynomadi via your use of this citynomadi.com service. citynomadi.com uses SSL "Secure Sockets Layer" to secure the information on transference data.

For example, Citynomadi uses encryption technology when collecting financial personal data such as credit card information. If citynomadi.com supports online transactions, it will use an industry standard security measure, such as the one available through SSL to protect the confidentiality and security of online transactions. If used, industry standard security measures like SSL authentication ensure that credit card information, as well as other personal data submitted as part of the buying process, is reasonably safe from third party interception.

Location based data

To gain the best and optimal user benefit of Nomadi app, the location feature GPS of the user's app is crucial. While using the browser, the user should allow the browser to utilise one's location. It is fully acceptable to enjoy citynomadi.com service without the activated GPS or location on, but in that case be prepared not to have your location on the map.

The Nomadi app and Citynomadi's white label apps can send push notifications according to one's location, create statistics of the length and duration of the route and notice the opened Point of Interests. This is the anonymous data which we use to refine the overall service.

We handle the location based data fully anonymously, and no user cannot be identified in compliance with it. Therefore this is not considered as personal data.

Legal basis for processing of personal data

The processing of personal data is based on the agreement between a business client and Citynomadi or an individual to sign up to Citynomadi's Community. We will be able to use personal data for the following on consent and a legitimate interest:

- as for provision of services, customer communication and invoicing
- as for producing, developing, progressing improving and insuring our service



- as for a user based customising and advertising our service
- as for analysing and create statistics of our service
- as for market research and direct marketing
- as to avoid the misdemeanor and solve a possible one, and
- as to insure the rights and / or assets connected to our service.

To assign the personal data

We do NOT assign the personal data of the Premium or Community subscriber register, the B2B customer register of the citynomadi.com, or the Nomadi app or white label apps to the third parties.

We receive the right to assign the personal data the Premium or Community subscriber register of the citynomadi.com; the Nomadi app or white label apps; or B2B customer register in specific unique cases following on consent and a legitimate interest, which are:

- for our Premium subscribers in relation with the routes they administer
- for the service providers, that participate to our service: such as payment or open source data providers
- for the authorities, in case that it is required by the law, Citynomadi or the third party
- for the owners of Citynomadi in case of business acquisition or arrangement.

The rights of subscribers

The subscriber of citynomadi.com has a right to know and view what personal data of him / her is saved on citynomadi.com. Also he / she is able to know and view what information he / she has saved on citynomadi.com. Also the subscriber is entitled to request the rectification of incorrect data.

The subscriber of citynomadi.com has the right to ask for deleting the personal data of his / hers and the information he / she has saved on citynomadi.com.

On request of the subscriber we will correct, delete or complement the incorrect, unnessesary, inadequate or outdated personal data.

If the subscriber uses the right to audit within 12 months of the last audit, we will charge a reasonable fee for giving out the information.

Processing data outside of the EU/EEA

Citynomadi handles the personal data in the trustworthy and transparent manner. We handle the subscriber personal data mainly within EU/EEA area. In order to develop the service and provide customised communication we may need to hand over information across the EEA area. These are the cases, when their service provider or their servers are situated outside the EEA area.

The subscriber is aware and approves these transferes. Citynomadi is engaged to give out the subscriber and end user the detailed information and the legal basis of the transfere.

Citynomadi has ensured that the model clauses apply to the transfer of data outside the EU/EEA.

Changes to privacy notice

This privacy notice replaces all the previous versions. Citynomadi will update this notice as its operations and services develop. The updates can also be based on the changes in the applicable legislation. The updates can be



seen on Citynomadi's website, where the latest privacy notice will always be displayed. Citynomadi may also, if it finds it appropriate, notify the data subject of the changes in the privacy notice via electronic notification.

Updated July 10, 2018