

This Privacy Statement was prepared on April 24, 2020.

### Registrar

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This website is operated by Positive Learning Oy (business ID: 2891546-4) ("Positive", "we" or "us"). Positive is a Finnish software company providing tools for teachers for the positive learning method. The website is provided for informational purposes containing information about the services we provide and for providing an opportunity to subscribe for our newsletter as well as for register as a user of our services.

### General conditions

Positive offers this website, including all information and services available on this website to you conditioned upon your acceptance on these Terms of Service. Please read these Terms of Service carefully before using our online services. If you do not approve these Terms of Service, please do not use our online services.

Any new features added to our online services shall also be subject to the Terms of Service. You can review the most current version of the Terms of Service at any time on this page. We reserve the right to update, change or replace any part of these Terms of Service by posting updates and/or changes to our website. It is your responsibility to check this page periodically for changes. Your continued use of or access to the website following the posting of any changes constitutes acceptance of those changes.

In addition to these Terms of Service, terms and conditions of online store apply when purchasing products from our online store. In the event of any inconsistency between the provisions of these Terms of Service and the Terms and Conditions of Online Store, these Terms of Service shall prevail.

### Responsibility

Positive does not guarantee the uninterrupted or error-free operation of its website. Positive is not responsible for any direct or indirect damages resulting from the use of this website or from its unavailability or for any related damages.

### Copyright and other intellectual property rights

The material available on this website may not be adapted in any way, reproduced, shown in public, shared or used in any other way for public or commercial purposes without prior written consent from Positive.

The use of any material available on this website for any purpose on other websites or in a computer environment connected to a network is forbidden.

The rights to the material contained on this website – including copyrights – are owned by Positive. Positive's corporate name is also protected trademark of Positive. Positive's logo may not be used on a website without permission from Positive. The use of press releases, price lists and other documents intended to be public is allowed with the provision that the source of the information is mentioned in the context.

### **Applicable law**

Any dispute arising out of or in connection with these terms and conditions, Positive's website or its content shall be subject to Finnish law. Such disputes shall be settled in the District Court of Helsinki.

### **Privacy policy**

This privacy policy explains how we use any personal data we collect about you when you use our website [www.seethegood.app](http://www.seethegood.app) subscribe for our newsletter or register as a user to our service or for other purposes as described in this privacy policy.

When and why do we process your personal data

We may collect personal data about you when you:

- Use our website and services (automatically collected data, such as IP-address and cookies);
- Subscribe for our newsletter (Providing your email means opting-in to our marketing material);

We may process your personal data for the following purposes:

- Providing the products and services;
- Providing technical and user support;
- Communicating about our products and services (incl. direct marketing);
- Statistical analyses;
- Fulfilling the rights and obligations of you and Positive;
- Improving and developing the security, products and services;
- Preventing fraudulent activities;
- Insuring and developing the functionality and security of our website;
- Fulfilling our legal obligations; and/or
- Removing or prohibiting sharing of illegal or infringing content.

### **What categories of personal data do we process**

For the purposes listed above, Positive processes the following categories of personal data:

- Basic information (for example name, address, e-mail address, phone number);
- Records of purchases;

Information regarding the use of the website; and

- Records automatically created when you visit our online services, such as IP-address, traffic source, pages visited, the links and features used, the content viewed or requested, device information, browser or application type and access times.

## **What is the legal basis for processing your personal data**

As explained above, we process your personal data for the purposes of providing, improving and developing our website (incl. Online Store) as well as contacting you, conducting marketing and research and creating reports to our internal use. We also process your personal data when fulfilling the possible agreement between you and Positive as necessary e.g. relating to the processing, delivery and invoicing of your orders made via Online Store.

Depending on the purpose we process your data, the processing is based on:

- Legitimate interest of Positive;
- The contract between you or your organisation and Positive;
- Your consent; or
- Legal obligations.

When choosing to use your data based on our legitimate interests, we weigh our own interests against your right to privacy and e.g. use pseudonymized or non-personally identifiable data when possible.

Providing your email means opting-in to our marketing material. You may withdraw your consent at any time as explained in more detail below.

## **Data transfers and categories of recipients**

We do not share your personal data, except as approved and agreed by you or as described below:

- We may engage other companies or individuals to perform tasks on our behalf. These third parties may have access to your personal data.
- We may release your personal data as permitted or required by applicable law.

Personal data in the European Union is protected by data protection laws but other countries do not necessarily protect your personal information in the same way.

Our websites and some of our applications or services or parts of them may also be hosted in the United States or otherwise outside of the EEA (which means all the EU countries plus Norway, Iceland and Liechtenstein) ("EEA") and this means that we may transfer any personal data which is submitted by you outside the EEA to the United States or to other territories outside of the EEA.

We may use service providers located outside of the EEA to help us provide our website to you and this means that we may transfer your personal data to service providers outside the EEA for the purpose of providing our website to you.

We may also provide your personal data to advertisers, partners and publishers

We take steps to ensure that when your information is transferred outside of the EEA by our service providers and hosting providers, appropriate measures and controls are in place to protect that information in accordance with applicable data protection laws and regulations. In each case, such transfers are made in accordance with the requirements of GDPR and may be based on the use of the European Commission's Standard Model Clauses for transfers of personal data outside the EEA.

### How long do we store your personal data?

The personal data we process is retained only as long as necessary for the purposes set forth in this Privacy Policy, unless longer retention is required by applicable local law or where we have a legitimate and lawful purpose to do so. When the personal data is no longer needed, we will destroy all such data in our possession within a reasonable time. Your personal data may also be destroyed upon your request, unless the applicable law in force at the time of the request does not prevent deletion of such data.

### How do we secure your personal data?

We will store your personal data by using the best practices of the industry in secure operating environments that are not available to the public. The personal data is accessible only by named persons bound by appropriate confidentiality obligations and whose tasks require accessing to such data.

We will take all reasonable technical and organizational measures to protect your personal data from unauthorized access or against loss, misuse or alteration by third parties. However, we cannot fully eliminate security risks associated with personal data and therefore, we cannot be held liable for any unauthorized access to or use of your data.

### Cookies

See our current cookie policy [here](#).

### Your rights as a data subject

As a data subject, you have the following rights regarding your personal data:

**Right to access your data.** You have a right to access your personal data collected by us. If you wish to receive a copy of such personal data, please send us an e-mail by using the controller's contact information. We may charge a small fee for this service.

**Right to rectification.** If your personal information changes, or if you find your personal data to be inaccurate, you may correct, update, or delete inaccuracies by making the change by contacting us.

**Right to erasure.** You have a right to withdraw your consent regarding the processing of your personal data and require us to erase such data we have processed based on your consent. We will retain and use such information only if we have a legitimate and lawful purpose to do so, e.g. to comply with our legal obligation or resolve possible disputes. You also have the right to have us erase your personal data if (a) such data is no longer necessary for the purposes for which it was collected or processed, (b) there is no justified reason for us to process your personal data or (c) your personal data has otherwise been processed unlawfully. If you would like to have your personal data erased, please send us an e-mail by using the contact information below.

**Right to restriction.** You have a right to request us to restrict the processing of your personal data for example when you are waiting for our response for your request to access or erase your data.

**Right to data portability.** You have a right to receive your personal data you have provided us in a structured, commonly used and machine-readable format and, if you so desire, have your data transmitted to another controller, when technically feasible.

**Right to lodge a complaint.** If you feel our processing of your personal data is in breach of the GDPR or you are not satisfied for any other reason, please send us an e-mail by using the controller's contact information. You also have a right to lodge a complaint with a local supervisory authority.

### How to contact us

If you have any questions or concerns about our data privacy practices, or if you have any requests for resolving issues with your personal information, please contact us:

By e-mail: [hello@positive.fi](mailto:hello@positive.fi)

By mail: Positive Learning Oy, Maria01, Lapinlahdenkatu 16, 00180 HELSINKI