

## OVIKU MOBILE APPLICATION - PRIVACY POLICY AND DATA FILE DESCRIPTION

Valid since February 12th 2018. For latest privacy policy document, see [https://cdn.shopify.com/s/files/1/2620/6610/files/Oviku-PrivacyPolicy\\_en.pdf](https://cdn.shopify.com/s/files/1/2620/6610/files/Oviku-PrivacyPolicy_en.pdf)

Finnish Personal Data Act (532/1999), Section 10

This file description is applied to the processing of the personal data collected through the usage of Oviku application.

Oviku Ltd. reserves the right on alter and amend this file description. By continuing app use after receiving amendment notification is deemed as your acceptance.

### 1 DATA CONTROLLER

Oviku Ltd. is the developer and maintainer Oviku smart lock and the mobile application.

Oviku Ltd.

Kaavintie 8, 01650 Vantaa, Finland

info@oviku.com

### 2 PERSON IN CHARGE FOR FILE MATTERS

Tomi Ek, tomi.ek@oviku.com

### 3 NAME OF THE PERSONAL DATA FILE

The name of the personal data file is: "Oviku 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 Oviku Ltd. and its customers. Personal data is used for sharing lock key sets, managing user names in application 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 Oviku Ltd. business and services.

### 5 CONTENTS OF THE DATA FILE

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

#### Customer information:

User name set in application.

#### Usage information:

Service keeps a lock-specific log file which contains information on when lock is opened and closed and by whom (user name, shared key). Log file is only accessible with mobile application and by lock owner only.

### 6 REGULAR SOURCES OF INFORMATION

The personal data is added to this register when customer starts using application supplied by Oviku Ltd. Lock usage information uploads to server when application is connected to network.

### 7 REGULAR DISCLOSURE OF PERSONAL DATA

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

Oviku Ltd. has the right to use subcontractors and partners 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

Oviku Ltd. does not verify the correctness of any customer given information. Customer has the right to alter or delete their information by contacting the mentioned in section 2. Normal Oviku lock functionality does, however, require saving the information to server.

### 9 SECURITY OF THE PERSONAL DATA FILE

Oviku Ltd. service personnel required to process the register data are obliged to withhold Customer's service use habits and communication contents. Oviku Ltd. 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 MOBILE APPLICATION

#### Camera

Oviku mobile application uses camera only for scanning QR codes. Scanned images are not saved to memory nor uploaded to server.

### 11 FURTHER INFORMATION

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

