

PRIVACY STATEMENT

1. General issues

Fitner Inc. (hereinafter "the Company") is committed to ensuring the confidentiality and privacy of any personal data it holds. This Privacy Statement is applicable to the personal data that the Company collects into our customer register (hereinafter "the Register").

As the Company continues to develop its business and data protection processes, The Company may amend this Privacy Statement and reserve the right to do so. The Company encourages you to review the contents of this Privacy Statement for possible amendments regularly and on your own initiative.

2. Data controller and contact information

FITNER Inc./Data Protection Officer
Lutterikuja 2
FI-60200 SEINÄJOKI
FINLAND
VAT number FI23515082
Business ID 2351508-2

3. Purposes and legal basis for processing personal data

The information contained in the Register is used, for example, for the following purposes:

- For creating customer (registered or potential) relationships for managing and maintaining these relationships as well as for communication or billing
- For ordering and producing products and services developed by the Company
- For maintaining, developing, reporting and assuring the quality of products and services developed by the Company
- For business planning and marketing
- For risk management and prevention of abuse.

The Register may also contain information on terminated customer relationships.

The legal basis for processing the data in the Register is the customer's consent, the contract and its implementation, or the legitimate interest of the Company (e.g. in relation to maintaining and managing the customer relationship and billing).

The information in the Register is not used for automated decision making or profiling.

4. The data content and sources of the Register

The information to be stored in the Register consists of: customer's first name, last name, company name, VAT/Business ID, telephone number, street address, postal code, post office, country, email address and usernames associated with the service of the Company as well as identity information used in electronic communication. The Register contains information on the products, services and contracts ordered by registered customers, information on their use or modifications as well as other information and material accumulated prior to or during the customer relationship. Where applicable, the information referred to in this paragraph is also stored about potential customers and group exercise instructors using the products and services offered by the Company.

The data sources of the Register consist of the information provided by the customer in connection with the registration and stored either by the customer or the Company prior to or during the customer relationship. Information stored in the Register is obtained from a potential or registered customer, for example, through web forms, e-mail, telephone, social media services, contracts, customer meetings and other situations where a potential or registered customer discloses information.

The data may also be collected and stored in the Register by the Company from private or public sources. The Company also collects data by using the Google Analytics.

5. Cookies

Cookies are small text files that are stored on your device when you visit a website. The text file contains a small amount of information that the Internet server can read the next time you visit the same website.

What types of cookies do we use?

- *Necessary Cookies:* these cookies are essential for the proper functioning of our website and they enable a good user experience. These cookies do not collect data that enable us to identify you.
- *Analytical Cookies:* by following the use of these cookies, we can improve the functioning of our website. We receive information about e.g. which parts of our website are the most popular, to which sites do you move on from our website and from which site did you come from as well as how long do you stay on our website.
- *Marketing Cookies:* these cookies help us make the content of the website as personalized as possible, and thereby show e.g. targeted advertisement and content based on prior online behavior. The Company uses marketing cookies managed by third parties in order to present its products both on its own website and on the websites of third parties.
- *Social Sharing Cookies:* our websites may include links and connections to third party websites, products and services as well as so called community plugins of third parties. The third-party plugins integrated into our website are downloaded from third-party servers and thus the third-party may install their own cookies on the user's device and collect information about a visitor's activity on our website. These third-party services and applications offered on our website are subject to the privacy policies or notices of such third parties.

You can reject cookies simply by leaving the website. If you wish, you can also prevent the use of cookies by changing your browser's settings not to allow the storing of cookies on your device. In some cases, this may lead to slower browsing of our websites or the access to some sites to be denied altogether.

A part of the cookies on our website are managed by third parties and you may alternatively use the tools of these third parties to decline the use of these cookies. We use i.e. Google Analytics service, which tracks the data of the users of our website by saving cookies to the user's device.

6. Disclosure of Information

Information contained in the Register will not be disclosed to third parties under any circumstances other than those required by law or subject to the express consent of the person concerned. However, the Company is entitled to disclose personal data e.g. in situations concerning business organization.

Information contained in the Register will not, in principle, be disclosed outside the EU or the EEA. However, the Company may, for example, use server resources located around the world when offering its services to the customers. The Company may thus transfer personal data outside the country in which the services are used and possibly to countries outside the EU.

In such cases, the Company ensures that there is a legitimate reason for the transfer and that the personal data of the customer is protected in a technically appropriate manner and in accordance with the prevailing data protection legislation. The company also ensures that the recipient of the information has an adequate level of data protection, as determined by the European Commission.

7. Retention period of data

The data contained in the Register shall be kept only for as long as is necessary for the purposes for which the data contained in the Register is processed. The Company strives to keep the personal data in its possession accurate and up-to-date by deleting unnecessary information and updating outdated information. Obsolete and redundant information shall be deleted from the registry in an appropriate manner.

8. Registry protection

The Company uses appropriate means to protect personal data. Such means may be, for example, the use of firewalls, encryption techniques, safe equipment accommodations, proper access control, controlled issuing of accesses and the control of their use. Such means may also include instructing personnel involved with processing personal data, and careful selection of sub-contractors, as well as the use of contractual and other similar means when using third parties to handle personal data. The Company uses modern encryption techniques and standards to protect the confidentiality of electronic transactions.

9. Rights of the data subject

At any time the data subjects have the right to:

- Request access to their personal data and obtain a copy of the information held in the Register.
- Demand the rectification or supplementing of any inaccurate or incorrect personal data.
- Request that the Company erases their personal data, under certain conditions (e.g. when considering the data unnecessary for the purposes described above or cancelling the consent given).
- Withdraw the consent if the processing of their personal data is based on their own consent.
- Object to the processing of their personal data based on personal circumstances, insofar as our legitimate interests (e.g. direct marketing) form the grounds for processing their personal data.
- Demand restriction when dealing with their personal data, under certain conditions.

In case the data subjects request to exercise their rights listed above, the requests will always be assessed according to the circumstances in the individual case. To exercise the above rights, the requests must be submitted in writing to the Company in accordance with the Contact information section of this Privacy Statement. The Company may ask the data subject to specify the request in writing and to verify the identity before processing the request. The Company may collect a fair fee for fulfilling the request or refuse to implement the request if it is manifestly unfounded or excessive or if the Company has another legitimate ground for refusing the request.

The data subjects shall always have the right to complain to or contact the appropriate data protection authority if they consider that the Company has not processed their personal data in accordance with the applicable data protection legislation.