

# HappySignals Privacy Policy

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# Privacy Policy

Updated on **5.3.2021**

*Protection of your privacy is important to us. HappySignals Oy (hereinafter “HappySignals”) is committed to protecting your privacy in the best possible way and to processing your personal data transparently in accordance with applicable data protection laws and good privacy practices.*

We want to be transparent about our data processing. Happy Signals application is a Cloud Virtual Machine hosted web application which is fully administered, developed and offered as a SaaS service to HappySignals’ Customers. This Privacy Policy describes how personal data is being processed when a user gives feedback via HappySignals application. In addition, this Privacy Policy describes how personal data is processed when our customers’ named personnel analyze the survey gathered data by using HappySignals customer portal. This Privacy Policy also applies to our data processing practices regarding personal data when a person visits our website or contacts us via our website or otherwise, for example, to register for a seminar, book a demo or download material.

We periodically update this Privacy Policy. We will post any privacy policy changes the Privacy Policy page and, if the changes are significant, when it is possible, we seek to provide a more prominent notice by sending you an email notification.

## 1. Definitions

**Controller** refers to the party which is in charge of the processing and determines how the personal data is processed.

**Processor** refers to the party which is processing personal data on behalf of the controller and according to the instructions received from the controller.

**Personal data** involves any piece of information relating to an identified or identifiable person (‘data subject’) that allows us to identify a person directly or indirectly.

**Processing of personal data** relates to any operation or set of operations which is performed on personal data, such as collection and storing of personal data.

**Registered user** refers to a HappySignals user that has registered to HappySignals SaaS service.

**XMP** refers to HappySignals Experience Management Platform.

## 2. How do we process your personal data?

### HappySignals as a Processor

*HappySignals acts as a Processor when we provide tools and services to our Customers. We process personal data in connection with the following activities: when a user gives feedback via HappySignals application, when an analytics user registers to HappySignals application, and when we provide support functions to our Customers and their representatives.*

When providing our tools and services to our Customers, we process personal data as a Processor in connection with the following activities:

- Feedback Survey:

We embed feedback tools into service completion emails or other issue resolving channels or channels decided by our customers. User accesses HappySignals XMP via a webpage which presents them a survey form. Users can rate the service experience they received from the Customer's internal service. When the user gives feedback via HappySignals XMP application, we process, on behalf of our Customers, pseudonymized data, such as case identifier and IP addresses.

The form also includes a free text field in which we recommend the user not to share any personal data in, and 'reasons why' selection. The feedback data is combined with other identifiers, such as company name, country and location of the user which are available to the Customer's registered user in the HappySignals' customer portal. The survey answer (including the case identifier, score, reasons behind the scoring, free text field, and evaluation of lost work time) is sent back to the Customer and attached to the case identifier in the system from where the survey request originated from. Customer's service organization uses the data for further developing the offered services.

The survey further allows the option to collect an email address in case the user wishes to be contacted by their staff. This feature is optional to the Customer.

- Registered users:

Analytics user needs to register to HappySignals XMP SaaS. The registered user analyses the survey gathered data via HappySignals XMP customer portal. Processed personal data of the registered users include their first name, last name, email address, user defined password, date of joining, last login date, name of the organization, and activity log entries (i.e. entries when the user saves/deletes a quick signal or performs similar operations). The information is needed for identification and authentication purposes.

- Support functions:

We provide support functions to our Customers and their representatives when they use our tools and services. Providing these functions requires processing of contact information, such as first and last name, as well as the email address received in connection with the support requests.

The abovementioned processing activities are based on a performance of a contract between HappySignals and its Customer. The Customer remains as the Controller for the said personal data processing activities. The Customer defines the basis for the processing and HappySignals processes personal data under its Customer's instructions.

## HappySignals as a Controller

*HappySignals acts as a Controller when we process personal data to operate our business. This includes offering and providing tools and services to our Customers, marketing and advertising our products and services, developing our tools and services and fulfilling our legal requirements. HappySignals also acts as a Controller for the personal data concerning the visitors of our website, our B2B contacts as well as other stakeholders, such as suppliers and their representatives.*

*HappySignals Oy  
2643260-2  
Aurorankatu 11 A 1,  
00100 Helsinki  
hello@happysignals.com*

We process personal data to operate our business, as well as to offer and provide our tools and services. As a Controller, we process personal data for the following purposes:

- To provide tools and services to our Customers

This includes, for example, processing of contact information, billing information and other information provided in the context of the provision of services as well as responding to queries and emails of our Customers. Processing of personal data is necessary for entering into a contract or the performance of a contract between the Customer and HappySignals. We use personal data to provide our Customers with our products and services and to ensure their functionality and provide updates. If you the Customer does not provide us with the necessary information, it means that we are not able to enter into an agreement with the Customer.

- To market and advertise our products and services

This includes, for example, processing of contact details provided to us through our contact forms, such as first and last name, email address and phone number. We contact you about our products and services also in case you download our materials, sign-up for a demo, or order our newsletter. You can unsubscribe at any time from the

link found at the bottom of the email. We also use personal data to personalize your experience on our website. This processing is based on our legitimate interest to establish new business relationships and to maintain the already existing ones. You can ask us to remove your data from our database at any time by contacting us (hello@happysignals.com).

The processing of personal data for the provision of HappySignals' newsletter is based on your consent. You have the right to withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before the withdrawal.

- To develop our tools and services

We process personal data, for example, customer request and usage data, to develop our tools, services, sales, website, and marketing. This processing is based on our legitimate interest to develop and improve our services and our business.

- To fulfill legal requirements

Where necessary, we process personal data in connection with fulfilling the legal requirements we are subject to, such as the requirements arising from accounting or tax laws. We may also need to process your personal data in accordance with applicable law to defend our legitimate interests, for example, in civil or criminal legal proceedings.

Our website contains links to other websites that are not owned or operated by HappySignals. Please, be aware that we are not responsible for the privacy practices of such other websites or third parties. We recommend that you take a look at their privacy notices before using their services.

### 3. To whom do we disclose and with whom we share your personal data?

*We use service providers to provide our services and to help operate our business efficiently. We have relevant contractual arrangements in place in order to ensure that our service providers process personal data in accordance with the data protection laws and good data processing practices. Our processors do not have the permission to process personal data in any ways beyond the agreed services and HappySignals remains the Controller of the personal data. Some of our service providers or their support functions are located outside the EU and EEA.*

HappySignals application receives data from the ticketing system or other channel of our Customer and returns the survey answer to the ticketing system.

We utilize the following services when you are answering a survey:

- HappySignals application is hosted in Azure cloud (Microsoft Corporation).
- Google Fonts (Google LLC or Google Ireland Limited) is a typeface visualization service that HappySignals uses to incorporate external content on its pages.
- Google Analytics (Google Inc.), to provide statistics on survey usage.

We utilize the following services when you are analyzing the survey results in the XMP:

- HappySignals application is hosted in Azure cloud (Microsoft Corporation).
- Google Fonts (Google LLC or Google Ireland Limited) is a typeface visualization service that HappySignals uses to incorporate external content on its pages.
- Google Analytics (Google Inc.), Hotjar Form Analysis & Conversion Funnels (Hotjar Ltd.) and HubSpot Analytics (HubSpot Inc) are used for website and user behavior analytics.
- Hotjar Heat Maps & Recordings (Hotjar Ltd.) is used to monitor and analyze web traffic and keep track of user behavior in our website and user behavior analytics.
- Other service providers that we use relating to XMP Analytics, include MailGun (Mailgun Technologies, Inc.), Zapier (Zapier Inc.) as an integration for transferring user data to MailChimp, and MailChimp (The Rocket Science Group, LLC).

For marketing and support we utilize:

- HubSpot CRM and Lead Management services (HubSpot Inc.) are used to store data about our prospective and current customers. In addition, we use HubSpot as a marketing automation tool where we store data related to our marketing activities.
- HubSpot Email (HubSpot Inc.), Zapier (Zapier Inc.) as an integration for transferring user data to MailChimp, and MailChimp (The Rocket Science Group, LLC). We also use Leadfeeder (Liidio Oy) for analytics.
- Sentry (monitoring service provided by Functional Software, Inc.) is used for tracking user interface errors.

In addition, Livestorm (Livestorm SAS) is hosting our webinars and our podcasts are available in iTunes (Apple Inc.) and Spotify (Spotify AB).

We may have to disclose certain information to public authorities or law enforcement when this is required by law.

In the event we go through a business transition, such as a merger or acquisition by another company, or sale of all or a portion of its assets, personal data is likely be among the assets

transferred, which means that the acquiring entity may obtain access to relevant customer data assets.

The personal data of HappySignals XMP SaaS service is stored in our Azure hosting environment in Azure Data Centers. In addition, some of our service providers or their support functions are located in the United States, for example our customer contact data is hosted in US by HubSpot and we use application services for HappySignals in US. When the processing involves transferring personal data outside EU or EEA, we use appropriate legal mechanisms to ensure the same level of data protection as in the EU. We require our Personal data sub processors to comply to EU Standard Contractual Clauses when it comes to the mechanism of the data Transfers – this is verified by Data Protection Agreements made with these parties.

#### 4. How do we secure your personal data?

*HappySignals has taken appropriate security measures to protect the personal data you provide on computer servers from potential loss, misuse or unauthorized access. We guarantee that your data is kept confidential and secure by firewalls and passwords. The backups are also securely hosted in the Cloud environment. We maintain reasonable administrative and physical safeguards in an effort to protect personal data that is in our control and custody. We have implemented role-based access control to protect personal data and use secure connections. Our server environments are subject to regular penetration testing. Removable media is not used. All the employees authorized to process your data have further committed themselves to confidentiality.*

#### 5. What rights do you have?

***You have several rights concerning your personal data, such as right to access, update, delete and have a copy of such data. We want to ensure that you can efficiently exercise your data protection rights. You can exercise your rights by contacting us via our email: [hello@happysignals.com](mailto:hello@happysignals.com).***

*You can also contact us by a letter to the address:*

*HappySignals Oy  
2643260-2  
Aurorankatu 11 A 1,  
00100 Helsinki*

*We are happy to help you with any request concerning your personal data. We will process all inquiries individually and by a real person.*

*When HappySignals acts as a Processor, we assist the Controller in fulfilling the data protection rights of data subjects by all means necessary.*



*Please notice that in case we are not able to identify you, because we are only processing pseudonymized data, we cannot execute your rights unless we are provided with an additional information which helps us to identify the data concerning you.*

## **Data subject's rights.**

### **5.1 Right to rectify your data**

We aim to keep your personal data correct, completed and up to date at all times. You can ask us to rectify any inaccurate or incomplete data by contacting HappySignals (hello@happysignals.com). The correction is done as soon as possible.

### **5.2 Right to restriction of processing your data**

In certain circumstances, you have the right to request a temporary restriction of the processing of your personal data. For example, if you contest the lawfulness of the processing or deny the accuracy of your personal data, or if you need your data in legal proceedings. In the case of a temporary restriction, we will exclude all the personal data we have about you from daily use until the matter has been solved.

### **5.3 Right to object to the processing of your personal data**

When we process your data on the basis of our legitimate interests, for example, for direct marketing purposes, we ensure that such processing will not cause any significant intrusion into your privacy, or any other undue impact on your interests and rights. If you wish to stop receiving our newsletter or marketing emails, please follow the unsubscribe instructions included in these emails or contact us (hello@happysignals.com).

### **5.4 Right to have your personal data erased (“right to be forgotten”)**

In principle, you have right to have your personal data erased in part or in full. We will, for example, erase your personal data when it is no longer needed for the purposes it was originally collected for, or when the processing of your personal data is based on your consent and you withdraw such consent. Please note that we will not be able to erase the personal data if there is a valid legal obligation or another justified need to retain the data for a longer period of time. Registered users can ask us to delete their accounts at any time.

### **5.5 Right to withdraw consent**

When you have given a consent for the processing, and you do not want us to continue processing your data, you have a right to withdraw your consent at any time. You can unsubscribe from our mailing list by using the opt-out link at the bottom of the message.

### **5.6 Right to data portability**

You have a right to request transferring certain personal data. The right to transfer is applicable only when we process your personal data based on your consent or agreement

and it applies only to personal data you have provided us yourself. We will provide your personal data in machine-readable format so that you can store it yourself or transfer it to another service provider. Upon your request, we will transfer the data to another controller directly if it is technically feasible.

#### 5.7 Right of access to your data

You have the right to obtain a confirmation whether your personal data is being processed or not at any time. If we collect personal data about you, you are entitled to receive a copy and obtain information regarding the processing of such data. You can request for all of the data related to your user account at any time by contacting HappySignals (hello@happysignals.com). HappySignals will compose a document of all the data we have for you to analyze.

#### 5.8 Right to lodge a complaint with a supervisory authority

If you consider that the processing of personal data relating to you infringes the data protection laws, you have the right to lodge a complaint with your local data protection authority. If you need help with the exercise of this right or have any questions relating to the processing of your personal data, please contact us (hello@happysignals.com).

## 6. Cookies

*A cookie is a text file that is stored on your hard disk when you visit a website. We use cookies in the HappySignals service in connection with the feedback survey for application performance management. In addition, cookies are utilized to keep the session alive when a registered user uses HappySignals application for analytics and to enable the use of the application. In order to further develop our application, we also track some of the user interface actions using Google Analytics. We use cookies and other similar technologies also to collect data on the usage of our website. By analysing our website usage, we aim to maintain and further develop our websites, and to identify potential customers. You can disable cookies in the browser settings or delete cookies from the browser and disable all targeted advertising and communication based on your previous visits on our website.*

### **Read more**

#### **This website and service is owned and operated by:**

HappySignals Oy  
Aurorankatu 11 A 1  
00100 Helsinki, Finland  
VAT # FI26432602

The feedback survey form of HappySignals application contains a Google Analytics tag, which will save: page information (URL, of which query strings are pseudonymized and title of the page user is viewing), browser information (browser name, the size of the browser window, screen resolution, java enabled and flash version) and user information (location derived from the IP address where the hit originated, pseudonymized IP and language). In addition, we utilize usage data to see from which browsers the survey is accessed and also from which

major level geolocation the survey is answered in to make our service better. The cookies are used for application performance management. When a registered user uses HappySignals application for analytics, HappySignals stores registered user's sign-in status in user's browser as a cookie. Cookies are used to keep the session alive and to enable to the use of application.

We use cookies and other similar technologies also to collect data on the usage of our website. By analyzing our website usage, we aim to maintain and further develop our websites. For example, we get information on which service pages you go to and how you navigate between the pages. The collected data also helps us to provide more personalized services and marketing to you. We use cookies to personalize your experience when you visit our website and to collect, store, and track information for statistical purposes to operate our website. We use cookies to assess content usage and to compile statistics about the use of the website in order to identify potential cases of abuse and improve the user experience. This statistical information is not otherwise aggregated in such a way that would identify a visitor as an individual.

Our servers automatically record information that your browser sends when you visit our website. This data includes, for example, your device's IP address, browser type and version, operating system type and version, language preferences or the webpage you were visiting before you came to our website, pages of our website that you visit, the time spent on those pages, information you search for on our website, access times and dates, and other statistics. This data is used to identify potential cases of abuse and establish statistical information regarding website usage.

First-party cookies are allocated to the website that you visit while third-party cookies come from a third-party, such as a web analytics program.

### **Google Analytics**

We use Google services (Google Inc.) for HappySignals' website and in the HappySignals service. We use Google Analytics to demographically analyse our visitor base and usage of application features. Google utilizes the data collected to track and examine the use of HappySignals, to prepare reports on its activities and share them with other Google services. Google may use the data collected to contextualize and personalize the ads of its own advertising network.

You can prevent Google's collection and use of data by downloading and installing the browser plug-in available or use other advertising and tracking prevention tools.

### **How to avoid or delete a cookie?**

Most web browsers automatically accept cookies, but you can delete cookies by modifying your web browser setting to decline cookies if you prefer. Different web browsers may use different methods for managing cookies. Please, follow the instructions below, from the most common web browser manufacturers directly, to configure your browser settings.

[Microsoft Internet Explorer \(IE\)](#)

[Google Chrome](#)

[Safari](#)  
[Firefox](#)

For more information, please visit:

Google: <https://policies.google.com/privacy?gl=fi>  
Hubspot: <https://legal.hubspot.com/privacy-policy>  
Leadfeeder: <https://www.leadfeeder.com/cookies-and-tracking/>  
Livestorm: <https://livestorm.co/privacy-policy/>

Please note that, these links belong to third party sites which are not under HappySignals' control.

## 6.1 Cookies Set

- Google Tag Manager Cookies – allows us to control some aspects of the user experience.
- Google Analytics Cookies – pseudonymized information on application usage.
- Hubspot Cookies – help functionalities such as chat enabling cookies.
- XMP Session and CRSF tokens for usage of the XMP Analytics.

## 7. How long is your data retained?

*We have determined retention periods based on the purpose of the processing and the applicable legislation. We process personal data only for as long as required by the purpose it has been collected for. For example, personal data collected for purpose related to the performance of a contract between HappySignals and its Customer is retained until such a contract has been fully performed. We review the collected personal data regularly to ensure that the personal data we have is up to date and is not retained longer than needed.*

### Read more

- Invitations for registration are held for a maximum of 3 months if not activated.
- Data concerning registered users is deleted in case a registered user is not active for 6 months.

For more detailed information about our retention times, please contact us.

## 8. Privacy policy updates

*We periodically update this Privacy Policy. We will post any privacy policy changes the Privacy policy page and, if the changes are significant, when it is possible, we seek to provide a more prominent notice by sending you an email notification.*

