

HappySignals Platform Privacy Policy

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Privacy Policy

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 privacy best practices.

We want to be transparent about our data processing. HappySignals Service is a set of cloud-hosted web applications, which are fully administered, developed and offered as a SaaS-model to HappySignals’ customers.

This Privacy Policy describes how personal data is processed when a user gives feedback via the HappySignals Service. In addition, this Privacy Policy describes how personal data is processed when a customer’s named personnel analyze the gathered data.

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

Overall Security and Privacy summaries can be found here:

<https://support.happysignals.com/security-policy>

<https://www.happysignals.com/privacy-policy>

1. Definitions

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

HappySignals Service refers to multiple services provided by HappySignals to all its customers. These include for example, Experience Management Platform, surveys, integrations.

ITSM System refers to an organization’s IT Service Management system(s), used to deliver and operate services offered to its users.

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 named personnel analyzing the gathered survey data by using the HappySignals Service.

XMP refers to HappySignals IT 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 Service, when a platform user registers to HappySignals XMP, 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:

- Survey:

We embed feedback tools into service completion emails or other issue resolving channels or channels decided by our customers. User accesses HappySignals Service via a website that presents them with a survey form. Users can rate the service experience they received from the Customer's internal service. When the user gives feedback via HappySignals Service we process, on behalf of our customers, ticket data and an anonymized user identifier.

The form also includes a free text field in which we recommend the user not to share any personal or confidential data, 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 Service. The survey response (including the ticket ID, rating, reasons behind the rating, free text field, and evaluation of lost work time) is sent back to the Customer and attached to the ticket ID in the system which the survey request originated from. Customers are using the data for further developing their 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:

Platform user needs to register to HappySignals XMP. The registered user analyzes gathered survey data. Processed personal data of the registered users including their first name, last name, email address, user defined password, date of joining, last login date, name of the organization, and audit log entries (e.g. when the user saves a shortcut or performs similar operations). The information is needed for identification and authentication purposes.

- Support functions:

HappySignals organization provides support functions to our customers and their representatives. Providing these functions requires the processing of contact information, such as first and last name, name of the organization, email address.

The above-mentioned processing activities are based on the performance of a contract between HappySignals and its customers. The customer remains as the Controller for the personal data processing activities. The customer defines the basis for the processing and HappySignals processes personal data under its customers' instructions.

HappySignals as a Controller

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 between the customer and HappySignals.

- To develop our tools and services

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

- To fulfill legal and regulatory requirements

Where necessary, we process personal data in connection with fulfilling the legal and regulatory 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.

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

HappySignals Service receives data from the customer's ITSM System, or other customer channel, and returns the survey response to the ITSM System.

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

- Microsoft Ireland Operations Ltd to provide storage and computing resources.

We utilize the following services when you are analyzing data in the HappySignals Service:

- Microsoft Ireland Operations Ltd to provide storage and computing resources
- Pendo.io, Inc. to provide statistics on the XMP and in-app communication
- Mailgun Technologies, Inc to provide email message delivery services
- Amazon Web Services EMEA Sarl to provide storage and computing resources
- Functional Software, Inc. Sentry is used for application performance monitoring and error tracking

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 our 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 Service is stored in Microsoft Azure and Amazon data centers. The location of data centers is dependent on the customer agreement and selection of region where the services are provided from. The data center locations are United States, European Union and United Kingdom. HappySignals can make changes to available data center locations.

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 subprocessors to comply with 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 from potential loss, misuse or unauthorized access. We guarantee that your data is kept intact, confidential, and available, secured with modern controls and monitoring tools. We maintain safeguards to protect personal data that is in our control and custody. For more information, please see [HappySignals Security Statement](#).

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 email: privacy@happysignals.com.

You can also contact us by letter to the address:

Privacy officer
HappySignals Oy
Aleksanterinkatu 15 B,
00100 Helsinki, Finland

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

Please note that we might not be able to identify you, as we are only processing anonymized data on the survey responders. We may not be able to execute your rights unless you provide us additional information to identify the data concerning you.

5.1 Right to rectify your data

We aim to keep your personal data correct, complete and up to date at all times. You can ask us to rectify any inaccurate or incomplete data by contacting HappySignals (privacy@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, 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 email communication, please follow the instructions to unsubscribe or contact us (privacy@happysignals.com).

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

You have the 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 period of time. Registered users can ask us to delete their accounts at any time.

5.5 Right to withdraw consent

If 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 of 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 the data related to you at any time by contacting HappySignals (privacy@happysignals.com). HappySignals will provide the data you have requested.

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 (privacy@happysignals.com).

6. 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 customers is retained until such a contract has been fully performed. We review the collected personal data regularly to ensure it is up to date and is not retained longer than needed.

For detailed information about HappySignals Service data retention times, please contact us privacy@happysignals.com.

You can also contact us by letter to the address:

Privacy officer
HappySignals Oy
Aleksanterinkatu 15 B,
00100 Helsinki, Finland

7. Privacy policy updates

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

8. Document control

This is a copy of the policy document for public distribution.