

PRIVACY NOTICE

Arena Interactive Oy is committed to complying with applicable data protection legislation. We encourage our customers, users of our services, partners and other stakeholders to read the privacy information presented on this page.

This Privacy Notice concerns Arena Interactive's processing of personal data relating to users of the SmartDialog service, other services and the website, and contact persons of existing and prospective business customers and partners.

In this Privacy Notice, we explain, among other things:

- what types of data we collect and for what purposes
- the legal bases on which we process data
- how long we retain data
- how cookies are used in the service
- what choices and rights data subjects have
- to whom personal data is disclosed or transferred
- how personal data is protected
- who our services are intended for
- when we act as a joint controller
- how this Privacy Notice may be amended
- whom data subjects can contact

Arena Interactive's contact details are provided at the end of this Privacy Notice.

1. What types of data are collected about me and for what purposes?

We only collect personal data about data subjects that is necessary for predefined purposes. The purpose determines what types of data are collected in each situation. When collecting data, we aim to explain which information is required to use the services or is otherwise mandatory for the performance of a contract, and which information the data subject may provide voluntarily.

We categorise the data we process into data provided by the data subject, data observed from the use of the services and website, inferred data and data obtained from other sources, as follows:

1) Personal data of contact persons of business customers or partners: We collect information provided by the data subject or their employer for purposes including providing and invoicing for the service, managing and developing customer relationships, marketing and opinion surveys. We cannot perform the contract without contact and billing details.

The data we process includes:

- contact details, such as name, address, telephone number and email address

- employer details, such as the employer's name, Business ID, industry and contact details
- information relating to duties and position, such as area of responsibility
- information relating to the customer relationship, such as billing and payment details, product and order details, customer feedback and communications
- information on events and interactions, such as attendance at events and communications with sales and customer service
- login details, where supported by the features of the service
- consents or opt-outs
- information provided in questionnaires and surveys
- other information collected with the data subject's consent or required by law

2) Data on prospective customers: For prospective customers, such as individuals who may be interested in our services or our former customers, we typically process names, contact details and other identifying information, such as target group information. For former customers, we may also process information relating to previous orders or the customer relationship. For contact persons of prospective business customers or partners, we also process information relating to their duties, such as their position or area of responsibility within the company. We may also process information relating to communications and responses to them, requests for and downloads of guides or other materials, and the sending and opening of marketing messages and clicks on links in them.

3) Data observed from the use of the services through cookies and similar technologies: We use cookies and similar technologies to automatically collect information that helps us understand how many users our websites and services have, which content is popular and how long users view content. We use this information to develop our services and business, tailor content to users' likely interests, target marketing communications, and prevent and investigate misuse. This information includes:

- usage and browsing information relating to the features of the service, such as pages visited
- technical information, such as a unique device and/or cookie identifier, browser and browser version, IP address, session time and duration, screen resolution and operating system.

4) Data inferred from the use of the services and customer data: We may use analytics to infer, for example, a data subject's potential interests from information observed in the service and/or information provided by the data subject, and assign the data subject to a particular user segment. We may combine information observed from the use of the services with information provided by the data subject when we identify the data subject, for example when they log in to the service or access the website via a customer or marketing email. We use this information for statistics and analysis, to develop our services and business, and to tailor content, newsletters and marketing messages.

5) Data obtained from other sources: We may use external data sources to update and enrich data, such as the register maintained by Asiakastieto, the ProFinder target group service, public registers of companies and decision-makers, companies' public websites, online social networking services, telephone companies' contact information registers, and other similar private and public registers. This information helps us ensure that we use accurate and up-to-date data about data subjects and, through data enrichment, better tailor our offering to

their anticipated interests. If we process data for purposes other than those listed above, we ensure that the processing is compatible with the purpose for which the data was originally collected.

2. What are the legal bases for processing personal data?

We process data on the following legal bases under data protection legislation:

Consent: Non-essential cookies are placed on the basis of the data subject's consent. We may also process personal data on the basis of consent in other situations where we request the data subject's separate consent for a specific processing purpose.

Legitimate interest: We process data on the basis of our legitimate interest where processing is necessary to operate and develop our business, services, customer relationships or customer communications, and the data subject's interests or fundamental rights and freedoms are not considered to override that interest.

In particular, we process data on the basis of our legitimate interest for the following purposes:

- processing the data of contact persons of business customers and partners to manage customer, contractual and cooperation relationships
- delivering services, providing technical support, processing orders and invoicing
- developing our business and customer service
- organising prize draws, competitions, events and research
- preventing and investigating misuse and correcting errors
- ensuring information security, asserting and defending legal claims, and analysing the use of our services
- marketing by telephone or post, marketing targeted on the basis of professional duties, and electronic B2B direct marketing where the marketing relates to the recipient's role or area of responsibility in the company they represent.

We also process data relating to representatives of our business customers on the basis of the relevant connection arising from our contract with the company concerned.

These purposes are necessary for our business and justified by the relevant connection between the data subject and Arena Interactive, and therefore serve our legitimate interest. Taking into account the nature of the data processed, the purposes of processing and the relationship between the data subject and the controller, we consider that the processing does not conflict with the data subject's fundamental rights or freedoms.

Data subjects may object to processing based on legitimate interest at any time. For example, they may opt out of marketing communications and newsletters.

Where, for example, we tailor communications or content on the basis of customer or usage data, this constitutes profiling. However, we do not make automated decisions that produce legal effects concerning data subjects or otherwise significantly affect them.

Legal obligation: We may be required to collect or retain certain personal data relating to data subjects to comply with accounting legislation or other mandatory legislation. In such cases, processing is based on compliance with a legal obligation.

3. How long is personal data retained?

We retain personal data relating to data subjects only for as long as necessary to fulfil the purposes specified above, in accordance with applicable legislation. Data subjects may also influence how long their data is retained by exercising the choices and rights described in section 5 below.

We retain data relating to customers or partners and their representatives for the duration of the customer or cooperation relationship and for three years after it ends, unless there is a justified reason for retaining the data for longer, such as a need relating to legislation, invoicing, enforcement of the contract, complaints or legal claims.

Data relating to prospective customers is typically retained for marketing purposes for as long as the individual has not opted out of receiving marketing communications and the data has not otherwise become outdated. Individuals may opt out of marketing or request the deletion of their data at any time.

We may be required to retain certain personal data to comply with accounting legislation or other mandatory legislation even after the customer relationship or another legal basis for processing personal data has ended. Billing information is typically retained for seven years.

4. Do the websites use cookies and what are they?

We and our selected partners store information, such as cookies and device identifiers, on users' devices and use that information for the purposes explained to users. Cookies and similar technologies can be used to collect information on how and when online services are used, allowing us to make the services more user-friendly.

A cookie is a file stored in a user's browser. Technologies based on cookies allow users, for example, to avoid having to re-enter their usernames and passwords each time if they so choose. A cookie file contains an anonymous identifier used to identify the browser and monitor the use of the services.

Cookies may remain on a user's device until they are deleted. We also use session cookies, which expire when the user's visit (session) ends. First-party cookies are primarily set by the website shown in the address bar. In addition, our services use third-party cookies, such as those of measurement service providers and social media services.

Essential cookies are always enabled unless the user blocks cookies through their browser settings. Other, non-essential cookies are placed with the user's consent. More detailed information on the cookies currently in use, their purposes, lifespans and our partners is available in the website's cookie settings.

We categorise cookies as follows:

- **Essential cookies:** These allow, for example, login details to be stored, cookie choices to be remembered, content types to be displayed and various site-specific settings to be used, or are necessary to ensure information security, prevent misuse, correct errors, deliver content, block bots or carry out official online audience measurement. Cookies placed for these purposes are always enabled unless the user blocks cookies through their browser settings. We use Tawk.to software to collect information submitted through the website's contact form.
- **Functional cookies:** These allow, for example, settings to be saved. For example, we use YouTube to display videos on the website.
- **Statistical cookies:** These allow us to collect statistical information on how the website is used. For example, we use Google Analytics, a web analytics service

provided by Google Inc., and Google Tag Manager to analyse the use of our websites and develop them to better serve users. Information stored in the cookies used by Google's tools is sent to Google's servers around the world for storage, so the information may be processed on servers located outside the user's country of residence. Google uses the information it receives to evaluate how users browse the website's content and to compile summary reports on website use. Further information on Google's privacy practices: <https://policies.google.com/privacy>

- **Marketing cookies:** These enable targeted advertising. For example, analytics tools allow us to track how users navigate our websites. We use this information to develop our services and for marketing communications.

Users can make cookie choices when they first visit the website and, for example, after clearing cookies from their browser. Users can change their cookie choices, including withdrawing their consent, at any time by clicking "Cookie settings" in the website's footer navigation. Users can also clear or block cookies through their browser settings. Blocking cookies may prevent the website from functioning as intended.

5. What choices and rights do data subjects have?

We are committed to providing choices and control over privacy. Below, we list various ways in which data subjects can influence the collection and processing of their data:

- **Right of access:** Data subjects have the right to obtain confirmation as to whether or not personal data concerning them is being processed. If personal data is being processed, data subjects have the right to access it, provided that disclosing the data does not adversely affect the rights and freedoms of others. When submitting a request to access personal data, data subjects will be asked to provide information that enables Arena Interactive to identify them. This may include, for example, an email address and telephone number.
- **Rectification and erasure:** At the data subject's request, we will rectify, complete or erase personal data that is inaccurate, incomplete or outdated in relation to the purposes of processing.
- **Data portability:** Data subjects may have the personal data they have provided transferred where we process that data by automated means on the basis of consent or a contract.
- **Right to object to direct marketing and related profiling:** Data subjects may at any time prohibit the disclosure and processing of their data for direct marketing by clicking the link at the end of a message or by contacting our customer service.
- **Rights to object and to restriction of processing:** Data subjects may object to processing based on legitimate interest on grounds relating to their particular situation. For example, in such a situation, processing will be restricted while the grounds for the objection are assessed. Processing may also be restricted where, among other things, a data subject contests the accuracy of the personal data, in which case processing will be restricted for a period enabling us to verify its accuracy.
- **Withdrawal of consent:** Data subjects may withdraw their consent at any time by contacting our customer service or by other means separately provided. Consent to cookies can be withdrawn through the website's cookie settings.
- **Right to lodge a complaint:** Data subjects may lodge a complaint with the supervisory authority (<https://www.tietosuoja.fi/>) if they consider that their personal

data has been processed in breach of this Privacy Notice and applicable legislation. The supervisory authority for cookies is Traficom (www.traficom.fi).

Further instructions on exercising these rights are provided in section 11 of this Privacy Notice.

Requests from data subjects are assessed on a case-by-case basis and, where necessary, we may request additional information to verify the data subject's identity. We may retain and use personal data relating to data subjects where necessary to comply with legal obligations, resolve disputes or enforce contracts.

Users can also make the following choices relating to cookies:

- **Cookie settings in our services:** Users can make cookie choices when they first visit the website. After reviewing the cookies set by the website, users may give their consent or adjust their cookie settings, including refusing consent or objecting to the processing of personal data collected through cookies where that processing is based on legitimate interest. Users of the application are informed of the corresponding terms of use when logging in. Users can change their cookie choices, including withdrawing their consent, at any time by clicking "Cookie settings" in the website navigation.
- **Clearing cookies:** Users can clear cookies through their browser settings.
- **Blocking cookies:** Users can block cookies entirely through their browser settings, but this may prevent the website and application from functioning as intended.
- **Opting out of Google Analytics:** Users can prevent website data from being used by Google Analytics by installing the [Google Analytics opt-out browser add-on](#). This add-on prevents the Google Analytics JavaScript running on websites (ga.js, analytics.js and dc.js) from sharing information about website visits with Google Analytics.

Cookie settings are always browser-specific. Users must therefore configure their preferred settings separately in each browser and/or on each device they use.

6. Is personal data disclosed or transferred to third parties?

We do not sell, rent, transfer or disclose personal data to third parties except in the following circumstances:

- **Media Group Keskisuomalainen:** We may disclose personal data relating to data subjects within Media Group Keskisuomalainen. The companies currently belonging to Media Group Keskisuomalainen are listed [here](#).
- **Consent:** We may disclose data relating to data subjects to third parties if the data subject has consented to the disclosure.
- **Authorities:** We may disclose personal data relating to data subjects as required by requests from competent authorities or other parties, in accordance with applicable legislation.
- **Research and product development:** We may disclose data for scientific or historical research and product development, generally provided that the data has been converted into a form in which the individual concerned can no longer be identified.
- **Corporate transactions:** If we make acquisitions, merge or otherwise restructure our business, personal data relating to data subjects may be disclosed to buyers and their advisers.
- **Opinion and market research:** We may disclose a customer's personal data for opinion and market research unless the customer has prohibited this.

- **Debt collection and legal claims:** We may disclose personal data to third parties where necessary to enforce a contract, investigate potential breaches or establish, exercise or defend a legal claim.

We use subcontractors to process data and ensure through contractual arrangements that the data is processed in accordance with applicable legislation and this Privacy Notice.

As a rule, we do not transfer data outside the EU or the EEA. If we transfer data outside the EU or the EEA, we ensure an adequate level of protection for personal data, including by agreeing on matters relating to the confidentiality and processing of personal data as required by law, for example by using standard contractual clauses approved by the European Commission or relying on the EU-US Data Privacy Framework, and by otherwise ensuring that personal data is processed in accordance with this Privacy Notice.

7. How is my personal data protected?

We use the necessary technical and organisational security measures to protect personal data against unauthorised access, disclosure, destruction or other unauthorised processing. These measures include firewalls, secure equipment facilities, appropriate physical access controls, controlled granting of access rights and monitoring of their use, encryption technologies, instructions for personnel involved in processing personal data, and careful selection of subcontractors.

Please note that online services are not completely secure. Data subjects are responsible for appropriately maintaining the security of their own information systems.

8. Is children's personal data processed in the services?

Our service is not intended for children, and only adults may register for our services. We do not knowingly process children's personal data.

9. How does Arena Interactive act as a joint controller?

Arena Interactive acts as an independent controller in the processing described in this Privacy Notice, meaning that it alone determines the purposes and means of processing personal data.

A joint controller arrangement sets out the division of responsibilities between the parties, but data subjects may exercise their data protection rights against either controller.

10. Can this Privacy Notice be amended?

We continually develop our services and reserve the right to amend this Privacy Notice by notifying users through our services. Amendments may also result from changes in legislation. We recommend reviewing this Privacy Notice regularly. This Privacy Notice was last updated on 6 October 2026.

11. Whom can data subjects contact?

Data subjects may send enquiries relating to this Privacy Notice to:

Eini Ojanperä

eini.ojanpera@arenainteractive.fi

Arena Interactive Oy

Aholaidantie 3, 40320 Jyväskylä

The group's Data Protection Officer can be contacted by telephone on 014 622 000.

For requests concerning personal data, please contact Arena Interactive's customer service in the first instance:

010 320 1431

support@arenainteractive.fi

Arena Interactive Oy

Aholaidantie 3, 40320 Jyväskylä

1. Specify which right you wish to exercise (e.g. erasure of data, access to data or transfer of data to another service provider).
2. Provide information that allows us to identify the person making the request (for example, email address, name, address and telephone number). We will request further information if necessary.
3. A response will be sent to the email address you provide or, if none is provided, the information will be sent by post within one month.