

# Privacy Policy

This privacy policy explains how the Oilon Group (hereafter "Oilon" or "we") collects, processes, and uses personal data you share with us while using our websites, applications, products and/or related services. Within the Oilon Group, the data controller will be Oilon Group Oy and/or the Oilon group company/companies you have your business relationship with.

We process personal data you provide us with in accordance with the provisions of European Union General Data Protection Regulation ("GDPR") and other applicable data protection legislation.

This privacy policy is an integral part of our website's general terms and conditions of use. We recommend that you read carefully the aforementioned general terms and conditions of use of our website.

This privacy policy covers the following topics:

1. What data do we collect about you?
2. Where do we collect your data from?
3. How will we use your personal data and on what basis?
4. Automated decision making
5. Who do we share your data with?
6. Cookies
7. Other websites
8. How we protect your personal data?
9. Your rights
10. How long we store your personal data?
11. Changes to our privacy policy

## About us

Oilon Group Oy

Address: Metsäpietilänkatu 1, FI-15800 Lahti, Finland

Email: [datasecurity@oilon.com](mailto:datasecurity@oilon.com)

If you have any questions, comments or if you feel the need for further information regarding our privacy policy and the use of your personal data, please contact us: <mailto:datasecurity@oilon.com> or Metsäpietilänkatu 1, FI-15800 Lahti, Finland.

## What data do we collect about you?

We may process personal data of the following categories:

- Your name, date of birth, customer number, postal address, e-mail address, phone number
- General information related to your customer relationship with us
- Information related to the company you represent, e.g. company name, address, contact persons etc.
- Payment transaction information and information related to invoicing and collection
- Your answers to our customer surveys and the feedback you provide us
- Consents and prohibitions (related to e.g. direct marketing)
- Other possible information collected and as provided by you while using our websites, applications, products and related services.

When you visit our website or use our applications, products and related services, we may also collect certain personal data which is of general nature and anonymous. We use collected data to evaluate our applications, products and services, as well as to measure the use of our website and in general to improve and develop its content. Such data includes:

- Credentials, username, passwords, and similar security information used for authentication
- Demographic data such as your country and preferred language
- Information related to your product such as product serial number, installation information, system settings and status, environmental data, technical measurement and performance data, details of product use, network identification data (IP address, online status)
- Usage data such as how you and/or your device interact with us or our products, for example data about the features you use
- Device data such as data about your device and the network you use to connect to our product, including data about the operating system, IP address, device identifiers, regional and language settings and temperature settings
- Error reports and performance data related to our products, services and applications, and any problems you experience with them, including the type of the problem, details of the software or hardware related to an error, and data about your activity when the problem occurred
- Location data, for example, a location derived from your IP address with less precision, such as at a city or postal code level
- Support data such as your hardware, software, the content of your chats and other communications with us relating to customer support, and other details related to the support incident In addition to this, we may in certain applications specifically ask for your consent to use your camera in order to scan an EasyAce QR code or scan your network for available smart devices and in order to optimize network communication.

We do not collect or intend to collect or otherwise process any special categories of data relating to you.

Where do we collect your data from?

We collect your personal data primarily from you or when you submit it to us (for example, when you register an account with us, place an order or participate in customer surveys) or as part of your use of our website, products, services and applications. We may also collect and update personal data for the purposes described in this policy from publicly available sources and other external sources such as public registers of authorities as well as from other companies in the Oilon Group.

How will we use your personal data and on what basis?

For the performance of contract(s)

We process your personal data primarily to fulfil the contractual obligations, or in order to implement procedures prior to the contract. We process your personal data as necessary to provide you with the product and application and related services, create an account, provide customer care and service, perform invoicing, manage our warranty commitments, and to ensure our compliance with our contractual obligations and other promises and obligations.

Legal obligations

In addition to performance of a contract, we process your personal data in order to fulfill our legal obligations and authority decisions, for example for bookkeeping, providing information to competent authorities upon due request and other obligations related to applicable legislation concerning our products, services and applications.

On the basis of legitimate interest

Personal data is also processed based our legitimate interest as necessary to provide and improve our websites, applications, services and products, analyze the use of our websites (for example determine the number of visitors, individual pages visited), market our products and services, organize events and conduct surveys and establish, exercise, or defend our legal rights to the extent permitted by applicable laws and regulations.

On the basis of consent:

With your consent, we may process your personal data as necessary to send you offers and other electronic direct marketing, send you newsletters or track your location, if you have given your consent for us to process your location data.

You have the right to withdraw your consent for the processing of personal data at any time. You can withdraw your consent by notifying us through our website or sending us an email (see “about us” above).

### Automated decision making

We do not use personal data for automated decision-making or profiling.

### Who do we share your data with?

Oilon Group companies may use your personal data for the purposes defined in this policy, based on a legitimate interest to the extent permitted by applicable law, including for marketing their products and services to you.

We may also disclose personal data to our commercial partners based on a legitimate interest to the extent permitted by applicable law, for example if you have purchased our products and services from a commercial partner, we may need to exchange data about you as part of managing that relationship and your purchase. We may also share your personal data with third parties to whom we have outsourced tasks and who process personal data on our behalf. Our commercial partners include, for example, debt recovery agencies, insurance companies, retailers, auditors, sales partners, payment and invoicing partners, and IT software & service providers.

We may share your personal data if we have your consent to do so. Some of our products and services allow you to share your personal data with others. We may also share your personal data with a third party when this is required to fulfil our obligations under a contract with you or to fulfil a request by you.

If we decide to sell, merge or otherwise reorganize our businesses, this may involve us disclosing personal data to prospective or actual purchasers and their advisers. We may also disclose your data to competent authorities, such as the police, to the extent required and permitted by law. We may also disclose your personal data in relation to legal proceedings or at the request of an authority on the basis of applicable law, or court order or in connection with a trial or authority process, or as otherwise required or permitted by law.

We do not sell your personal data to third parties.

We may transfer personal data outside the EU and EEA as part of our operations. In this case, we make sure that the transfer is made by using the appropriate safeguards laid down by the applicable legislation, such as standard contractual clauses approved by the European Commission.

Our EasyAce application uses Firebase Crashlytics. It is a suite of products and services that provides developers with information about the functioning of their mobile applications, owned and operated by Google Inc. Personal data collected this way are, on the basis of Standard Contractual Clauses, transferred to, stored, and processed by Google in the USA or any other country where they operate, and are subject to the following terms:

<https://firebase.google.com/terms/data-processing-terms> and local data protection laws and other regulations, such as GDPR.

## Cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behavior information. This information is used to track visitor use of the website and to compile statistical reports on website activity (see above "Non-identifiable personal data"). We use the following types of cookies:

**Functional Cookies:** these cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the site will not then work.

These cookies enable the website to provide enhanced functionality and personalization. They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies, then some or all of these services may not function properly. These cookies do not store any personally identifiable information.

**Statistical Cookies:** these cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies we will not know when you have visited our site and will not be able to monitor its performance

**Marketing Cookies:** these cookies may be set through our site by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant adverts on other sites. They do not store directly personal information but are based on uniquely identifying your browser and internet device. If you do not allow these cookies, you will experience less targeted advertising.

At any time, you can easily modify or disable the parameters of the deposit of the different categories of cookies on our website(s), with the exception of functional cookies. The choices you make will only be valid when you are browsing the website.

We use the following Cookies on our website, the specific information is as follows:

**Oilon websites:** oilon.com, oilon.cn

Cookie name	Cookie type	Provider	Use	Valid period
_GRECAPTCHA	essential	Google	reCAPTCHA Enterprise sets a necessary cookie (_GRECAPTCHA) when executed for the purpose of providing its risk analysis	6 months
NID	marketing	Google	to provide ad delivery or retargeting, store user preferences.	6 months
CONSENT	essential	Google	Cookie consent by google	1 year
IDE	Advertising	Google	Campaign Manager, Display & Video 360, Google Ad Manager, Google Analytics, Search Ads 360	13 months EEA UK / 24 months elsewhere
__Secure-ENID	Advertising	Google	Used by for targeting purposes to build a profile of the website visitor's interests in order to show relevant & personalised Google advertising.	1 year 1 month
_fbp	Advertising	<a href="http://Oilon.cn">http://Oilon.cn</a> <a href="http://Oilon.com">http://Oilon.com</a>	Used by Facebook to track visits across websites.	3 months
_ga	analytics/third-party	Google	Used for Google Analytics	1 year
_gat_UA-*	analytics/third-party	Google	Used for Google Analytics	1 minute
_gat_gtag_UA	analytics/third-party	Google	Used to store Unique User ID	1 minue
_gcl_au	Advertising	Google	Used by Google for experimenting with advertisement efficiency across websites using their services	1 year

_gid	analytics/third-party	Google	Unique user id	1 day
_lfa	Marketing	<a href="http://Oilon.cn">http://Oilon.cn</a> <a href="http://Oilon.com">http://Oilon.com</a>	Store and track audience reach	1 year
bcookie	Preferences	<a href="http://Linkedin.com">http://Linkedin.com</a>	Store browser details	1 year
cmplz_marketing	essential	<a href="http://Oilon.cn">http://Oilon.cn</a> <a href="http://Oilon.com">http://Oilon.com</a>	Store marketing cookie consent setting	1 year
cmplz_policy_id	essential	<a href="http://Oilon.cn">http://Oilon.cn</a> <a href="http://Oilon.com">http://Oilon.com</a>	Store cookie consent policy id	1 year
cmplz_banner-status	essential	<a href="http://Oilon.cn">http://Oilon.cn</a> <a href="http://Oilon.com">http://Oilon.com</a>	Store cookie consent banner visibility	1 year
cmplz_functional	essential	<a href="http://Oilon.cn">http://Oilon.cn</a> <a href="http://Oilon.com">http://Oilon.com</a>	Store functional cookie consent setting	1 year
cmplz_statistics	essential	<a href="http://Oilon.cn">http://Oilon.cn</a> <a href="http://Oilon.com">http://Oilon.com</a>	Store statistics cookie consent setting	1 year
cmplz_preferences	essential	<a href="http://Oilon.cn">http://Oilon.cn</a> <a href="http://Oilon.com">http://Oilon.com</a>	Store user cookie consent	1 year
cmplz_consented_services	essential	<a href="http://Oilon.cn">http://Oilon.cn</a> <a href="http://Oilon.com">http://Oilon.com</a>	Store user consented services	1 year
li_gc	advertising	<a href="http://Linkedin.com">http://Linkedin.com</a>	Store user consented preferences	6 months
lidc	advertising	<a href="http://Linkedin.com">http://Linkedin.com</a>	Provides load balancing functionality	1 day
ln_or	advertising	<a href="http://Linkedin.com">http://Linkedin.com</a>	Used to determine if Oribi analytics can be carried out on a specific domain	1 day
ontame_id.cb71	analytics	<a href="http://Oilon.cn">http://Oilon.cn</a> <a href="http://Oilon.com">http://Oilon.com</a>	Store user id	1 year
ontame_ses.cb71	analytics	<a href="http://Oilon.cn">http://Oilon.cn</a> <a href="http://Oilon.com">http://Oilon.com</a>	Store session id	1 day

sp	analytics	<a href="http://ontame.io">http://ontame.io</a>	Store unique Id	1 year
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## Oilon Webshop: shop.eu.oilon.com

Cookie name	Cookie type	Provider	Use	Valid period
wp_woocommerce_session_oilon-webshop_XXXXX	essential	Oilon webshop	Store user's active session	24h
cmplz_consenteds_services	essential	Oilon webshop	Store consenteds services	1 year
cmplz_marketing	essential	Oilon webshop	Store marketing cookie consent setting	1 year
cmplz_policy_id	essential	Oilon webshop	Store cookie consent policy id	1 year
cmplz_banner-status	essential	Oilon webshop	Store cookie consent banner visibility	1 year
cmplz_functional	essential	Oilon webshop	Store functional cookie consent setting	1 year
cmplz_statistics	essential	Oilon webshop	Store statistics cookie consent setting	1 year
cmplz_preferences	essential	Oilon webshop	Store user cookie consent	1 year
cmplz_consenteds_services	essential	Oilon webshop	Store user consenteds services	1 year
woocommerce_cart_hash	essential	Oilon webshop	Stores a hash of the cart contents. This is used to determine if the cart contents have changed when a user comes back to the site.	Session
woocommerce_items_in_cart	essential	Oilon webshop	Stores the number of items in a user's cart	Session
wp_woocommerce_session_XXXXX	essential	Oilon webshop	Stores a session identifier for logged in users	Session
wordpress_logged_inXXXX	essential	Oilon webshop	Stores user's logged in information	Session
wordpress_XXXX	essential	Oilon webshop	Store authentication details	Session
wordpress_logged_in_XXXXX	essential	Oilon webshop	Store logged in user settings	Session
wordpress_test_cookie	essential	Oilon webshop	Used for testing that user has cookies enabled in browser	Session
_ga	analytics/third-party	Google	Used for Google Analytics	1 year

_ga_89BYPQ6X80	analytics/third-party	Google	Used for Google Analytics	1 year
tk_qs	essential	Oilon webshop	Store logged in user ID	Session
tk_ai	essential	Oilon webshop	Store logged in user ID	Session

## Other websites

Please note that our website may contain links to third party websites (including third-party advertisements). This privacy policy applies only to our website, and it is no longer valid when you leave our website. We do not control such other websites. We recommend you familiarize yourself of the privacy policies of those third-party websites.

Our website and/or applications may also include social plugins, such as the Facebook Like button or the Twitter Like and Share buttons. Although such social plugin buttons may be visible on our website or applications, the related content as well as privacy policy comes directly from the service provider in question.

## How do we protect your personal data?

Oilon is committed to ensuring that your personal data is secure. Your personal data will be carefully protected from loss, destruction, forgery, manipulation, unauthorized access and unauthorized disclosure. All personal data is secured and safeguarded with suitable physical, electronic and organizational measures.

We take care to minimize the volume of the personal data that we collect and the amount of time that we store it, to transfer and store the personal data securely in encrypted form and to pseudonymize the personal data where possible. We follow the best practices, and you can be assured that appropriate safeguards are in place to protect your personal data.

## How long we keep your personal data?

We retain your personal data as long as it is necessary for the purposes of processing of personal data or in order to fulfill our statutory obligations and to provide you our products, services and/or applications. The retention periods of personal data are determined in accordance with the applicable legislation, our contractual obligations and our justified need for such personal data. For example, in case of conclusion of a contract or an order, within the framework of the products, applications and/or services or otherwise, during the entire period of the contractual relationship, after

which the personal data is kept in intermediate archives for a period corresponding to the possible warranty period to which is added the applicable legal prescription period. Respectively, for data processed by us to comply with legal obligations (such as bookkeeping etc.), during the time required to carry out those legal obligations as set out in the applicable laws and regulations. In case of data processed based on your consent, we store the personal data until the withdrawal of your consent.

## Your privacy rights

You have the following rights in accordance with the General Data Protection Regulation("GDPR") with respect to your personal data:

- the right to request access to your personal data
- the right to rectify your personal data
- the right to request the erasure of your personal data
- the right to obtain your personal data in a structured, commonly used and machine-readable format and the right to transfer the relevant data to another controller
- right to object to processing or to request restriction of processing of your personal data, when processing is based on our legitimate interest
- the right to lodge a complaint with the supervisory authority (the Office of the Data Protection Ombudsman), if you consider that your rights based on the General Data Protection Regulation have been violated in the processing in the processing of your personal data.

## Changes to this privacy policy

We may update or change this privacy policy at any time with or without notice. The changes may also result from amendment of legislation. All changes will be displayed on our Website. We recommend that you visit this privacy policy regularly. This privacy policy was last updated on October 16, 2023.