



TalentMiles Web-app

General Terms & Conditions

These terms and conditions ("Terms") govern your access and use of the Talent app online service ("Service"). By accessing and using the Service you agree that you have read and accepted these Terms and that they shall apply to your use. If you do not wish to be bound by these Terms, please leave the Service.

The Service is operated and maintained by TalentMiles Oy, a Finnish company with the business ID 2819566-3. Contact: info@talentmiles.pro. The Service consists of content mainly developed by TalentMiles, but it may also include third party generated content or components.

Changes

TalentMiles reserves the right to change the Terms, layout, contents, availability and services provided or other properties of the Service or to close down the Service at any time without advance notification and for any reason. TalentMiles has the right to interrupt the service during maintenance and updating procedures.

Responsibility of TalentMiles

TalentMiles accepts no responsibility for damage, costs or losses arising from the use of the Service or from inability to access or use the Services or for any loss or damage relating to them, nor does TalentMiles accept liability for any loss or damage arising from telecommunications failures, computer system errors, malware or data security risks. TalentMiles does not guarantee that the Service will function without interruption or error. TalentMiles reserves the right to terminate the provision of the Service in whole or in part at any time.

You affirm and are responsible for ensuring that you do not submit any unlawful or inappropriate material to the Service.

You acknowledge and agree that it is your responsibility to keep secure and confidential the username and password that TalentMiles gives you, and not to disclose or otherwise provide such username or password to any third party, or to let such become public knowledge. You agree to advise TalentMiles immediately if you become aware, or have reasonable cause to believe, that the username and/or password has become compromised.

You acknowledge that TalentMiles may suspend and/or terminate (either in whole or in part) your use of any username if you violate these Terms for any reason.



Immaterial rights

TalentMiles reserves the proprietary rights, copyright and other immaterial rights to the Service, unless separate notice has been given. TalentMiles reserves all rights to the Service and its contents. The publication, reproduction, transmission or alteration of the Service or layout is prohibited without the consent of the immaterial rights holder. This prohibition does not apply to storage on a computer or printing for personal use. The material may be quoted in accordance with the Finnish Copyright Act. In such a case, the source of the material must always be disclosed.

Third Party Content

The Service includes content developed and operated by third parties. Third party components of the Service are governed by their own terms, conditions and privacy policies. TalentMiles accepts no liability for material produced by a third party which may be accessed through a link on the website.

Personal data

TalentMiles processes personal data in accordance with the data protection legislation and ensures the protection of privacy in the handling of such data. User data collected in the Service requiring registration is stored in TalentMiles' registers. Further information is provided in the TM Privacy Policy, which you can find on the landing page in the application.

TalentMiles stores log data on its servers and may also use third party logging services to collect data.

Collection of information while on the website (cookies)

The Service uses cookies. Cookies are small data files that are saved to your computer and which contain information about your visit on the website. The use of cookies enables TalentMiles to improve the usability of the Service and compile statistics on activity.

Cookies save data files on the user's IP address, time of visit, pages visited and type of browser, as well as the web address and server from which the user arrived at the Service.

Disabling cookies

You can stop cookies from being saved by changing the data security settings in your browser. It should be noted that cookies are necessary for the Service to function properly and as planned.



We monitor the use of and activities on our website with the help of Google Analytics. This service saves, among other things, the number of visitors and the time they spend on different web pages.

Other

These Terms are governed by and constituted in accordance with the laws of Finland. Any disputes concerning the Service shall be settled by Helsinki District Court.

Privacy Policy

About the privacy policy

This privacy policy describes what personal data and other information is collected and how this information is processed in the TalentMiles application (the "Service").

Personal data means information in which an individual person can be identified.

The user should read this privacy policy before beginning to use the Service and accept the practices concerning the processing of personal data according to this privacy policy. If the user does not accept this privacy policy or the general terms and conditions of use of the Service, he or she does not have the right to use the Service.

The Service is built to comply with the legislation concerning data protection and processes personal data according to good data management and data processing practices.

About the Service and its use

The Service provides individual, guided leadership and other training. Your employer or a corresponding entity has enrolled you for the training and use of the Service. This enrolling entity is also the Controller for data protection purposes and is identified as such on the Service landing page.

The Service is developed and owned by TalentMiles, a company that also acts as processor of the data.

What information is collected and from what sources?

Personal data is collected

- from the Controller (name, e-mail address, gender, language) at enrolment, and
- from the users themselves (department, contact details as phone number).

Other information may be collected with the user's permission.



Data obtained when using the Service:

- Service usage data as (i) operating system, (ii) browser, (iii) IP address, (iv) country and territory, (v) time and date of visit
- Service usage is analysed with Google Analytics. Google Analytics sets cookies to the computer to be able to analyse website usage. The cookies provide information on how you use the website (including your IP address). The information is used to assess usage and compile usage reports.

For what purpose is data collected?

Personal data may be processed in the Service for the following purposes:

- enrolling for and carrying out the training
- contacting users based on feedback received from them
- monitoring and reporting on training progress
- producing, maintaining, protecting and developing services

The lawful basis for the processing operations with regard to the personal data

Personal data is processed by TalentMiles in the Service based on an agreement with the Controller.

Do we disclose personal data?

Personal data in the Service is normally not disclosed.

However, your personal data may be disclosed in the following situations:

1. Your consent

With your explicit consent, personal data can be disclosed, for example, to a third party for a service provided by it.

2. To TalentMiles as manager of the Service
3. To TalentMiles or other entity as training provider
4. Subcontractors and service providers

Subcontractors and service providers are used for the technical maintenance of the Service and for training support services and communication. Personal data can be disclosed to subcontractors and service providers only to the extent they participate in the running of the Service. Subcontractors and service providers must not use the personal data disclosed to them for any other purposes than those described in this privacy policy and those determined by the Controller. Subcontractors and service providers are obliged to maintain the confidentiality of the data and to



ensure that appropriate data security and data protection measures are implemented to protect personal data.

5. International data transfers

The Service is based, and processing of personal data takes place primarily within the EU and the EEA, using operators and services established in these areas. If this principle is exceptionally and on a case by case basis deviated from, thorough reports regarding the implementation of data protection and data security in the service concerned are required from the service. A user may be based outside EU/EEA.

6. Use in research

We may disclose data for scientific or other studies, provided that the data concerned has first been changed into a form in which individual persons can no longer be identified.

7. Disclosures due to mandatory legislation

Under mandatory law, your personal data may be required be disclosed to authorities for official use.

8. Data transfer to third countries

Apart from exceptional cases, data is not transferred outside the EU or the EEA. If data is transferred outside the EU or the EEA, adequate level of protection for personal data will be ensured, for instance, by agreeing on matters related to the confidentiality of personal data and its processing as required by legislation, for example, by using model contract clauses approved by the European Commission and in other ways so that personal data is processed in accordance with this privacy policy.

9. The Controller will get information on your individual progress in the training and, on aggregate level, anonymized responses to tasks in the Service.

How is personal data processed?

Personnel engaged in the training and in the running of the Service may process personal data according to the legislation concerning data protection in force at the time.

Subcontractors and service providers will through contractual arrangements guarantee that personal data is processed in accordance with data protection legislation and appropriately also in other ways.

Protection of personal data?



The registers in the Service are maintained and protected through different technical and organisational measures. Fault tolerance and recover of data is ensured. These protection measures include access control, physical access control, technical solutions such as firewalls, and password protection. These measures enable access to the stored data only for named employees and for service providers with a contractual relationship with TalentMiles.

The Service can be temporarily closed to protect personal data.

How do we use cookies?

The Service uses cookies to improve the user experience of the Service. You will find more information about the use of cookies in our General Terms and Conditions.

How long do we store your personal data?

The data is stored in the Service in accordance with the agreement with and instructions from the Controller, normally only as long as necessary to fulfil the purposes described in this Privacy Policy.

What rights do you have?

You have a legal right to inspect what data we have collected about you. You also have the right to demand that incorrect, incomplete, unnecessary or outdated personal data be corrected or removed.

You can exercise your rights by contacting the Controller.

The GDPR provides certain rights related to the processing of personal data. TalentMiles respects all the rights mentioned under the GDPR and is committed to furnishing the appropriate means by which you can exercise these rights, according to the details mentioned below:

The **right of access**, which entails your possibility to obtain the confirmation from TalentMiles, through your Controller, whether your personal data is being processed in the Service or not, and if the case maybe you are entitled to solicit access to this data, as well as additional information regarding the personal data, such as: the purposes of processing, the categories of recipients the personal data are being disclosed to and the envisaged retention period.

In the situations where you may need to exercise the right of access, please contact your Controller as a first step.

The **right to rectification**, that allows you to request your Controller/TalentMiles rectification of any inaccurate personal data that the Service may hold, as well as to have your incomplete personal data to be completed.



- The **right to erasure** meaning that in the situations expressly regulated by law, you may request erasure of your personal data.
- The **right to restriction of processing**, signifying your right to obtain restriction of processing your personal data.
- The **right to data portability** implying your right to receive the personal data in a structured, commonly used and machine-readable format and further to transmit such data to another controller.
- The **right to object** to the processing of your personal data in the Service, on grounds relating to your particular situation. The right to object applies to the situations where consent is legal basis for processing.
- The **right to lodge a complaint** designates your right to challenge the manner in which processing of your personal data is performed.
- The **right to withdraw your consent** given for various processing operations, in cases where the consent represents the lawful basis for processing.

Changes to the privacy policy

TalentMiles constantly develops the Service and may from time to time make changes to this privacy policy without prior notice. However, if this privacy policy is substantially altered, a notification of it will be displayed at the beginning of this Privacy Policy for a duration of at least 30 days. Changes may also be based on a change in legislation. We recommend that you view this Privacy Policy from time to time to find out about the possible changes that have been made to the privacy policy.

Who is the controller and who can you contact?

Your employer or a corresponding entity has enrolled you for use of the Service. This enrolling entity is also the Controller for data protection purposes and is identified as such on the Service landing page.

Complaints can also be lodged with the data protection authorities.

Do not hesitate to contact us at info@talentmiles.pro if you have any questions about our privacy policy.