

This is the privacy policy and data processing addendum of C-Soft Oy (Finnish business ID: 0678742-2). This document is compliant with the Finnish Personal Data Act (10 and 24 §) and the General Data Protection Regulation (GDPR) of the European Union. Created on 15th of May 2018 and last update was made on 25th of July 2022.

1. Data controller

C-Soft Oy
Kylänpuolentie 197
FI-90460 Oulunsalo, FINLAND

+358 8 415 415 44
admin@c-soft.net

2. The representative of the data controller

Oikarinen, Kasper
+358 50 381 7941
kasper@c-soft.net

3. Types of data collection

Client database

4. Legal basis and purpose for processing of data

The legal basis for the processing of your personal data is:

- your consent, that you may have provided when registering as a client
- conclusion and performance of contractual arrangements and obligations between the Data Controller and the User
- pursuance of legitimate interests of the Data Controller
- the fulfillment of legal obligations

The purposes of the data processing are:

- to keep in touch with our clients
- account set up and administration
- providing services that you have ordered from us
- legal obligations
- marketing
- invoicing and billing

We do **not** process your personal data for the purposes of automated decision-making or profiling.

5. Data collection

The data we collect are the first and last name, company/organization, contact details (incl. postal address, state, country, phone number and email address), IP address of the internet connection, device and browser type (user agent), purchase details and history and the changes made to purchased services, as well as billing details.

These data are retained in compliance with legal and tax obligations. The retention duration shall however not exceed that which is necessary for the purposes that the data was collected and processed for.

6. Data sources

The data collected are generally obtained from the registration form that the client fills in while signing up as a client. The data may also be collected via email, phone calls, social media, as well as from contracts, meetings and from other situations where the client intentionally provides us with his/her personal data.

7. Data sharing and transfer outside the EU/EEA

The data controller may regularly share personal data with the following recipients **inside the EU/EEA**:

- Stripe Payments Europe (Ireland)
 - **Purpose of data sharing:** billing (card and SEPA direct debit payments)
 - **Data shared:** first and last name, email address, credit/debit card number, its expiration date and CVC code, IBAN account number and the name of its account holder, device and browser type (user agent) and the IP address of the internet connection

Data will **not** be regularly transferred outside the EU/EEA by the data controller.

In situations when you order domain names under a Top Level Domain whose Registry requires the transmission of your personal data to the Registry, we may need to transfer your personal data to the Registry. See "*10. The data controller as a data processor*".

Furthermore, when ordering domain names of a generic extension (gTLD), a copy of your domain contact profiles will be stored with DENIC Services GmbH & Co. KG, a German registered cooperative, which is an ICANN-authorized escrow service provider.

8. Principles of data protection

The data processing is always conducted carefully and processing conducted using data systems is secured appropriately. When storing personal data on servers, the physical and digital security of such data is taken ensured by data encryption and access control, to mention a few. The data controller insures that all stored personal data, login details to servers and other critical information are handled confidentially and only by those employees of the data controller, whose job requires it. When transferring personal data from one server to another or to a third country, the data controller will ensure the transfer is conducted over a secure and encrypted connection.

9. Rights of Users

- **Right to access.** Any client has the right to get a confirmation as to whether or not we are processing the data of the User. In cases where we do process the User's personal data, we will inform the User what categories of personal data we process regarding him/her, the purposes of the processing, the categories of recipients to whom personal data have been or will be disclosed and the retention period or criteria to determine that period.
- **Right to withdraw consent.** In case our processing is based on a consent granted by the User, the User may withdraw his/her consent at any time by contacting us. Withdrawing a consent may lead to fewer possibilities to use our Services.
- **Right to rectification.** Any User has the right to rectify or complete inaccurate or incomplete personal data we store about the User
- **Right to object.** In case our processing is based on our legitimate interest to run, maintain and develop our business, any User has the right to object at any time to our processing. We shall then no longer process User's personal data unless for the provision of our Services or if we demonstrate other compelling legitimate grounds for our processing that override User's interests, rights and freedoms or for legal claims. Notwithstanding any consent granted beforehand for direct marketing purposes, any User has the right to prohibit us from using his/her personal data for direct marketing purposes, by contacting us or by using the functionalities of the Services or unsubscribe possibilities in connection with our direct marketing messages.
- **Right to restriction of processing.** Any User has the right to obtain from us restriction of processing of User's

personal data, as foreseen by applicable data protection law, e.g. to allow our verification of accuracy of personal data after User's contesting of accuracy or to prevent us from erasing personal data when personal data are no longer necessary for the purposes but still required for User's legal claims or when our processing is unlawful. Restriction of processing may lead to fewer possibilities to use our Services.

- **Right to data portability.** Any User has the right to receive User's personal data from us in a structured, commonly used and machine-readable format and to independently transmit those data to a third party, in case our processing is based on User's consent and carried out by automated means.
- **Right to erasure.** Any User has the right to have personal data we process about the User erased from our systems if the personal data are no longer necessary for the related purposes, if we have unlawfully processed the personal data or if the User objects to processing for direct marketing. Any User furthermore has the right to erasure if the User withdraws consent or objects to our processing as meant above, unless we have a legitimate ground to not erase the data. We may not immediately be able to erase all residual copies from our servers and backup systems after the active data have been erased. Such copies shall be erased as soon as reasonably possible.

To exercise any of the above mentioned rights, the User should contact the data controller, preferably via email at support (at) c-soft.net. The data controller will answer within thirty (30) days.

10. The data controller as a data processor

When selling domain registration services, the data controller is instead the organization managing the domain name extension (TLD), the so-called domain registry. In such situations the data controller mentioned in this document acts as a data processor. While registering or transferring a domain name, or changing the details of the contact of an existing domain registration, the following personal data are collected of the registrant and any auxiliary contacts (administrative / technical / billing):

- first and last name
- organization name
- postal address (incl. state and country)
- phone number, and fax number if available
- email address
- any other additional details required by the domain registry / acting data controller, such as social security number or birthdate.

The above mentioned data may be shared with a domain registry within the EU/EEA or transferred to a domain registry in a third country. The details of the domain registries and its privacy rating is written on the information page of each Top-Level domain at <https://nordname.com/tld/com>, where "com" is to be replaced by the applicable Top-Level domain. On this information page we mention the name of the domain registry (acting data controller), the country it is located in, and its privacy rating that explains whether the country of the domain registry, or the registry otherwise, provides adequate data protection for the personal data of the data subject. In cases where no adequate data protections are in place or they can not be guaranteed, C-Soft Oy will require an explicit consent from the User in order to handle the order since the User's data protection rights may not be respected.