Linear Oy – Privacy Notice

Updated: 16.8.2023

LINEAR Oy is a limited liability company that provides a service platform and marketplace for the purchase and sale of apartments and real estate. In this Privacy Notice, we explain how we handle your personal data in LINEAR Oy's service, and we inform you of the key rights you have as a user of our service. This Privacy Notice does not in any way limit your rights under the law or the General Data Protection Regulation.

1 Controller

LINEAR Oy

Y-tunnus: 2880878-1 Kalevankatu 30

00100 HELSINKI (further "we").

2 Contact person for register matters

email: info@Linear.fi

3 Name of register

Customer and Marketing Register

4 What is the purpose and the legal basis of processing personal data?

The purposes of processing personal data are:

- the delivery and development of our products and services,
- fulfilling our contractual and other promises and obligations,
- taking care of the customer relationship,
- analyzing and profiling the behavior of a customer or other data subject,
- electronic direct marketing and
- targeting advertising in our and others' online services.

We use profiling to identify personal profiles, online behavior, age and consumer habits. We use this information e.g. to target marketing and to develop our services.

The basis of processing personal data is (i) our legitimate interest based on customer relationship; (ii) our legitimate interest based on being a controller; (iii) our legitimate interest based on other relevant connection; (iv) to perform a contract and (v) your consent.

We process the following personal data in connection with the customer register:

• contact information of the data subject such as name*, address*, phone* number, email username* and / or other unique identifier, password, nickname, age, gender and language of communication;

• *information related to the performance of the commission** such as any permits and consents for the commission, information about the commission to be performed, and the date of receipt and validity of the commission. ;

• **service usage information** such as service usage and browsing information, ads that have been shown, and information about clicking on ads, the page from which the user has moved to the controller site, the device model, the unique device and / or cookie tag, the data collection channel (web browser, mobile browser, application), the browser version, IP address, session ID, session time and duration and screen resolution and operating system;

• social media information our website may include social media features (community accessories), such as Facebook's "Like" button or "Share" button for content sharing. Facebook can disclose the information about the comments and links shared by the user in Facebook regarding the site. In addition, Facebook may disclose the information contained in the user's public profile as well as other information that the user shares with the Controller's services. Community accessories are the responsibility of the company that provides them. Their privacy policies can be explored in their own services, such as Facebook: https://fif.facebook.com/privacy/explanation;

• *information regarding the customer relationship and the contract* such as billing and payment information*, product and order information*, lottery and competition response information, order cancellation information, information about past and current contracts and orders, user profile formed based on the customer relationship, correspondence with the customer/data subject and other contacts, cookies and data related to using them;

• other possible information that is needed regarding the customer relationship gathered with data subject's consent.

Providing personal data marked with an asterisk (*) is a requirement for our contractual and/or customer relationship. Without the necessary information we are not able to provide the product and/or service. You can find our separate cookie policy here.

6 Additional Limits on Use of Your Google User Data

Linear's use of information received and Linear's transfer of information to any other app from Google APIs will adhere to <u>Google API Services User Data Policy</u>, including the Limited Use requirements.

7 From where do we receive data?

We receive information primarily from the following sources: yourself, population register, authorities, contact information service providers and from other sources with your consent, such as land and shareholder registers.

For the purposes described in this privacy notice, personal data may also be collected and updated from publicly available sources and based on information received from the authorities or other third parties within the limits of the applicable laws and regulations. Such updating of data is performed manually or by automated means.

8 To whom do we disclose data, and do we transfer data outside the EU or the EEA?

We may disclose personal data to authorities, for example, in order to facilitate investigation into misuse.

In the technical, commercial and operative realisation of processing tasks, Linear makes use of subcontractors that operate on its behalf.

We use subcontractors that process personal data on our behalf. We have outsourced the IT- and accounting management to an external service provider, on whose administrated and secured server the personal data is stored.

We might transfer personal data outside the EU/EEA. When personal data is processed outside the EU/EEA, we make sure that the subcontractor has committed to use the EU Commission's standard contractual clauses.

9 How do we protect the data and how long do we store them?

Only those of our employees, who on behalf of their work are entitled to process customer data, are entitled to use the system containing personal data. Each user has a personal username and password to the system. The data is collected into databases that are protected by firewalls, passwords and other technical measures. The databases and their backup copies are in locked premises and can be accessed only by certain pre-designated persons.

We will store personal information as long as it is necessary for the purpose for which it was originally collected or as long as required by law and regulations. The personal data contained in the customer account is, as a rule, stored as long as the customer account is valid. If the customer account has not been used for 12 months, the customer account data will be deleted or anonymized.

We estimate the need for data storage regularly, taking into account the applicable legislation. In addition, we take care of such reasonable actions that ensure no incompatible, outdated or inaccurate personal data is stored in the register taking into account the purpose of the processing. We correct or erase such data without delay.

10 What are your rights as a data subject?

You have the right to inspect the personal data stored in the register concerning yourself and the right to demand rectification or erasure of the inaccurate, outdated,

unnecessary and unlawful data. If you have access to your data, you may edit the data yourself. Insofar as the processing is based on consent, you also have the right to withdraw or change your consent. Withdrawing your consent does not affect the lawfulness of processing before the withdrawal of the consent.

You have the right to object or to demand restriction of the processing of your data and to lodge a complaint with the supervisory authority.

On grounds relating to your particular situation, you also have the right to object other processing activities when the legal basis of processing is legitimate interest. In connection with your request, you shall identify the specific situation, based on which you object to the processing. We can refuse the request of objection only on legal grounds.

11 Who can you be in contact with?

All contacts and requests concerning this privacy policy shall be submitted in writing or in person to the person mentioned in section two (2).