

# **Privacy policy**

This Privacy Policy provides an overview of how Tana processes personal data, including how we handle your information in specific contexts such as marketing and interactions with the tana.fi website or its related features.

We process personal data, such as your name, address, email address, and phone number, in compliance with the General Data Protection Regulation (GDPR) and other applicable data protection laws. This policy explains how we collect, use, and disclose information through www.tananorthamerica.com while prioritizing your privacy.

# 1. When do we collect your data

We may collect your personal data when you:

- -purchase TANA products,
- -subscribe to our newsletter,
- -give us permission for direct marketing,
- -participate in our marketing campaigns, market surveys, opinion -polls, or other events organized by us,
- -communicate with us through our service or social media channels,
- -share, publish or comment on content on our social media channels,
- -join the Tana distributor network

We may also collect and process data on you in connection with your use of our website or other services. In addition, we may use public registers or update services to collect and process address and status information.

# 2. How do we use and process your data

Below, we outline the specific purposes for which we collect and process your data:

### 2.1. Purposes for processing personal data

We process your personal data to deliver high-quality services, enhance your experience, and comply with legal requirements.

### 2.1.1. Service delivery

To provide newsletters, training, customer support, and fulfill your requests or purchases.

### 2.1.2. Product updates and alerts

To notify you of product upgrades, updated information, and other relevant services from Tana.

### 2.1.3. Service improvement

To operate, audit, analyze, develop, improve, and protect our services.

### 2.1.4. Customer relationship management

To manage, host, analyze, and strengthen our relationship with you.

### 2.1.5. Market research and marketing

To conduct market research and direct electronic marketing, in accordance with applicable laws.

### 2.1.6. Fraud prevention and protection



To safeguard our rights and property, and to prevent and investigate fraud or other misuse.

### 2.1.7. Legal compliance

To meet mandatory legal requirements or comply with law enforcement and civil or criminal legal proceedings.

#### 2.2. How we process your personal data

We process your data to provide products and services effectively, improve user experiences, and ensure compliance with regulations. Below are the detailed categories of processing:

#### 2.2.1. Product and service orders

If you purchase products or services, we use your data to process orders and handle potential returns or claims.

#### 2.2.2. Customer service and safety

Your data is processed to address feedback, claims, or other inquiries. Calls may be recorded, but we will notify you in advance.

#### 2.2.3. Marketing and personalization

We process your data for marketing purposes, including direct electronic marketing, with your consent. We may analyze your preferences to provide tailored recommendations, optimize our website, and curate product collections that suit your interests. This may include creating a profile based on information you provide or activity such as email engagement (e.g., opening emails or clicking links).

### 2.2.4. Market surveys and opinion polls

We use your data for market surveys and opinion polls to better understand customer needs and improve our products and services.

### 2.2.5. Events, campaigns, and social media

Your data may be used to organize events, promotions, or campaigns and to identify and ensure your participation.

#### 2.2.6. Regulatory compliance

To comply with applicable laws, such as trade sanctions or anti-bribery regulations, and to prevent fraud, we process your personal data as necessary.

By processing your personal data in these ways, we aim to provide a seamless and personalized experience while meeting our legal obligations and protecting your rights. For information about the processing of personal data in relation to whistleblowing, please refer to our whistleblowing guidelines.

# 3. What information do we collect about you

We may collect the following types of personal data:

**Identification and contact details**, e.g., your name, company, email address, and telephone number. **Customer relationship information**, e.g., our communication preferences, product interests, and information about your use of Tana products and services.

**Technical information data** e.g., your IP address, pages visited, links clicked, content viewed, device details, and other technical information provided by your browser or collected through our services.



We do not collect any sensitive personal information.

### 3.1. User tracking - marketing

### 3.1.1. Cookies and IP address tracking

If you have enabled cookies in your browser settings, your IP address may be linked with information you provide on our website. This allows us to improve customer communications and enhance your overall experience.

#### 3.1.2. Etag tracking

We use Leadoo's tracking service to monitor user activity on our website and combine this behavioral data with other information, such as data collected through chat interactions. Leadoo uses etag tracking to associate the same user's behavior across multiple sessions. This functions similarly to cookie-based tracking.

For more information about what is tracked and your rights, please refer to Leadoo Marketing Technologies Ltd's Privacy Policy. Under the General Data Protection Regulation (GDPR), Leadoo acts as the processor, while we act as the controller for the data. You can stop tracking by clearing your browser's cache after your visit. For additional details on how Leadoo complies with GDPR as a data processor, visit Leadoo's processor-specific privacy policy.

### 3.1.3. Pixel tags (Tracking pixels)

We use the Meta Pixel to track user interactions on our website, such as page visits and conversions, to improve our marketing efforts and deliver relevant content.

### 3.1.4. Analytics & automation tools

We use Google tools, for instance Analytics, Tag Manager, and Search Console, as well as Hotjar, to monitor website performance, analyze user behavior, and optimize your experience. Salesforce Account Engagement is a marketing automation system, which helps us automate our marketing measures and target them to potential customers. Account Engagement uses first party cookies: it allows us to gain more insight into our users' activities on our website.

We store your personal data for marketing purposes until the marketing consent has been revoked. If you decide to opt out of or withdraw your consent to our marketing, we will no longer use your personal data for this purpose. If the data is not needed for some other purpose (e.g. to carry out our customer relationship), we will delete the data without undue delay. We store browser and server-based tracking data in accordance with our cookie policy.

By continuing to use our website, you agree to the use of these tracking technologies as outlined in this policy.

# 4. When is your data disclosed to others

We may disclose your personal data to companies belonging to Tana Oy. In addition, we use external service providers in the processing of your personal data. We oblige such service providers contractually to ensure a sufficient level of data security to protect your personal data and to comply with applicable laws. These service providers may act as processors of personal data, in which case we commit them not to use your data for their own purposes, but they may also act as separate controllers, for example regarding personal data required for payment transfers, deliveries, and targeted marketing.

We may also disclose your data to authorities if we are required by law to do so, for example if it is necessary to prevent or investigate fraud or other illegal activities. We may also disclose your data to other parties by order of a competent court. In addition, we may disclose your data in connection with a possible sale of business or other corporate transaction to the buyer of the business or other relevant party related to the transaction.



If we transfer your personal data outside the EU/EEA, we will ensure that there is an appropriate legal basis for the transfer and that the data processing and data security comply with the requirements of applicable laws.

# 5. Your rights and choices

You have the following rights concerning your personal data:

- 1. Access and correction: You can request access to your personal data or ask us to correct, update, or delete inaccurate or incomplete information.
- 2. **Withdraw consent:** You may withdraw your consent for direct marketing or other data processing activities at any time by contacting us or using the "unsubscribe" link in our emails.
- 3. **Erasure and restriction:** You can request the deletion of your data or the restriction of its processing under certain conditions, such as when the data is no longer necessary or processed unlawfully.
- 4. **Object to processing:** You have the right to object to the processing of your personal data for legitimate reasons.
- 5. **Data portability:** You may request a copy of your data in a machine-readable format or ask us to transfer it to another provider.
- 6. **Lodge a complaint:** If you believe your data rights have been violated, you can file a complaint with your local data protection authority.

If you want to manage cookies or tracking technologies, please refer to our cookie policy.

#### 6. Amendments

We may amend this privacy policy from time to time. When we publish changes, the effective date at the beginning of this policy will change to the effective date on which the changes take effect.

# 7. Contact information

Controller: Tana Oy, business ID FI23740642 Tana Rental Oy, business ID FI29880611

If you have a request, notification, or any other question regarding the processing of your personal data, you can contact our **Data Protection Officer** by sending an email to <a href="mailto:dpo@tana.fi">dpo@tana.fi</a>.

P.O. Box 160 (Schaumanin puistotie 1) FI-40101 Jyväskylä, Finland +358 20 7290 240