

## **RENTLE PRIVACY POLICY FOR USERS**

This Privacy Policy is applicable to the personal data processed by Rentle Oy (“**Rentle**” or “**we**”) relating to those individuals (“**Users**” or “**you**”) who have created their personal user account within the Rentle user platform (hereinafter referred to as “**Service**”).

The purpose of this Privacy Policy is to provide Users with information about the processing of their personal data in accordance with the information obligations set out in Articles 13 and 14 of the General Data Protection Regulation 2016/679 (GDPR).

Please note that this Privacy Policy only applies to processing carried out by Rentle as a data controller. This Privacy Policy does not address, and we are not responsible for, the privacy and data processing practices of any third parties.

This Privacy Policy may be updated if required in order to reflect the changes in data processing practices or otherwise. The current version can be found on our website <https://www.rentle.io/for-consumers/privacy>. We will not make substantial changes to this Privacy Policy or reduce the rights of Users under this Privacy Policy without providing a notice thereof.

### **CONTACT DETAILS**

Name: Rentle Oy

Business ID: 2634632-5

Address: Otakaari 7 B, 02150 Espoo, Finland

Contact: [privacy@rentle.io](mailto:privacy@rentle.io)

Website: <https://www.rentle.io>

### **PERSONAL DATA PROCESSED AND SOURCES OF DATA**

We collect two types of information concerning the Users: (i) User Data; and (ii) Analytics Data.

Most of the User Data is received directly from you in connection with your use of the Service.

Analytics Data is collected automatically as you use the Service. Although we do not normally use Analytics Data to identify individuals, sometimes individuals can be recognized from it, either alone or when combined or linked with User Data. In such situations, Analytics Data shall also be considered to be personal data under applicable laws and we will treat the combined data as personal data.

Rentle may process the following categories of User Data and Analytics Data:

#### User Data

- Full name
- Email address
- Phone number
- Any information you submit into your Rentle profile (e.g. necessary data for determining your ski adjustments, such as age, height and weight)
- Any information you have provided to third party companies via the Rentle platform (e.g. rental or purchase history, related preferences and payment history)
- Account settings
- Direct marketing subscriptions or opt-outs
- Any direct correspondence with Rentle (e.g. feedback, support requests, questions)
- Any product or service ratings or feedback submitted by you within the Service

#### Analytics Data

- IP address
- Browser type and version
- Device type and model
- Operating system
- Time of visit
- Statistical data relating to your rental and purchase history (fully anonymized)

### **COOKIES AND ANALYTICS TOOLS**

We use various technologies to collect and store Analytics Data and other information when Users visit our Service, including cookies.

Cookies are small text files sent and saved on your device that allows us to identify visitors of our websites and facilitate the use of our Service and to create aggregate information of our visitors. This helps us to improve our Service and better serve our Users. The cookies will not harm your device or files. We use cookies to tailor our Service and the information we provide in accordance with the individual interests of our Users. Cookies are also used to integrate our social media accounts onto our website.

Users may choose to set their web browser to refuse cookies, or to alert when cookies are being sent. For example, the following links provide information on how to adjust the cookie settings on some popular browsers:

Safari

Google Chrome

Internet Explorer

Mozilla Firefox

Please note that some parts of our Service may not function properly if the use of cookies is refused.

We use Google Analytics, Intercom, Hubspot, Adyen and other similar web analytics services to compile Analytics Data and reports on visitor usage and to help us to track our online visitor flow in order to improve the Services and offer targeted content. Hubspot is also used as the CRM solution of Rentle.

## **PURPOSES AND LEGITIMATE GROUNDS OF PROCESSING**

### Purposes of processing

*To provide our Service and carry out our contractual obligations (legal ground: performance of a contract)*

We process personal data to be able to offer the Service to our Users and to run and maintain our business. Personal data may be processed in order to carry out our contractual obligations towards the User in accordance with our Terms of Service. We may use the data for example to offer essential functionalities of the Service and to provide access to the Service.

*For our legal obligations (legal ground: compliance with a legal obligation)*

We process personal data to enable us to administer and fulfil our obligations under law. This includes data processed for complying with e.g. our accounting obligations and providing information to relevant authorities.

*For security, claims handling and legal processes (legal ground: legitimate interest)*

We may process personal data in relation to claims handling and legal processes. We may also process data for the detection or prevention of fraud, misuse of our Services and for activities aimed at ensuring the security of our data, systems and networks.

*For communication and marketing (legal ground: legitimate interest)*

We may process personal data for the purpose of contacting our Users regarding our Service and for informing Users of changes in our Service. We may also process personal data to market our Service, for example in the form of sending newsletters.

*For quality improvement and trend analysis (legal ground: legitimate interest)*

We may process information regarding the use of the Service to improve the quality of our service, for example by analysing any trends in the use of our Service. Where possible, we will do this using only aggregated, non-personally identifiable data.

### Legitimate grounds for processing

We primarily process personal data of Users on a contractual basis.

We may also process personal data based on our legitimate interests, for example in connection with analytics

and marketing. When choosing to use your data on the basis of our legitimate interests, we carefully weigh our own interests against your right to privacy.

In certain cases Users may be requested to grant their consent for the processing of personal data. In this event, the legal ground for such processing is your consent. You may withdraw your consent at any time.

## **INTERNATIONAL TRANSFERS**

Rentle stores Users' personal data primarily within the European Economic Area. However, we have service providers in several geographical locations. As such, we or our service providers may transfer personal data to, or access it in, jurisdictions outside the European Economic Area or outside of the User's domicile.

We will take steps to ensure that the Users' personal data receives an adequate level of protection in the jurisdictions in which it is processed. We provide adequate protection for the transfers of personal data to countries outside of the European Economic Area through a series of agreements with our service providers based on the Standard Contractual Clauses or other similar arrangements.

## **PERSONAL DATA RECIPIENTS**

We do not share personal data with third parties outside of Rentle's organization unless one of the following circumstances applies:

*To service providers you are about to enter into a rental/sales contract with*

When you are about to enter into a rental or sales contract with a third party provider (for example a ski rental company) using the Rentle platform, you may retrieve and select your data from your Rentle account for filling out the necessary information during this process. In such case, we will transfer the chosen data to the provider in question. You also have the choice to submit ratings or feedback for the products or services you have purchased to the relevant service provider. Please note that the relevant service provider will then process your personal data as an independent data controller in accordance with their own privacy policy.

*To authorized service providers performing services for us*

We may share personal data to authorized service providers who perform services for us (including data storage, sales, marketing and support services). Our agreements with our service providers include commitments that the service providers agree to limit their use of personal data and to comply with privacy and security standards at least as stringent as the terms of this Privacy Policy.

*For legal reasons*

We may share personal data with third parties outside Rentle's organization if we have a good-faith belief that access to and use of the personal data is reasonably necessary to: (i) meet any applicable law, regulation, and/or court order; (ii) detect, prevent, or otherwise address fraud, security or technical issues; and/or (iii) protect the interests, property or safety of Rentle, our Users or the public in accordance with the law. When

possible, we will inform Users about such transfer and processing.

#### *For other legitimate reasons*

If Rentle is involved in a merger, acquisition or asset sale, we may transfer personal data to the third party involved. However, we will continue to ensure the confidentiality of all personal data. We will give notice to all Users concerned when the personal data are transferred or become subject to a different privacy policy as soon as reasonably possible.

#### *With explicit consent*

We may share personal data with third parties outside Rentle's organization for other reasons than the ones mentioned before, when we have the User's explicit consent to do so. You have the right to withdraw this consent at all times.

### **STORAGE PERIOD**

Rentle does not store personal data longer than is legally permitted and necessary for the purposes of providing the Service or the relevant parts thereof. The storage period depends on the nature of the information and the purposes of processing. The maximum period may therefore vary per use.

### **USERS' RIGHTS**

#### *Right to access*

You have the right to access your personal data processed by us. You may contact us and we will inform what personal data we have collected and processed regarding you. Where possible, Users should primarily use the Service functionalities to access their own account information.

#### *Right to withdraw consent*

In case the processing is based on a consent you have granted to us, you may withdraw the consent at any time. Withdrawing a consent may lead to fewer possibilities to use our Service. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

#### *Right to rectify*

You have the right to have incorrect or incomplete personal data we have stored about you corrected or completed by contacting us. Where possible, Users should primarily use the Service functionalities to correct their own account information.

#### *Right to erasure*

You may also ask us to erase your personal data from our systems. We will comply with such request unless we have a legitimate ground to not delete the data.

#### *Right to object*

You have the right to object to certain use of your personal data if such data are processed for other purposes than necessary for the performance of the Service or for compliance with a legal obligation. If you object to the

further processing of your personal data, this may lead to fewer possibilities to use the our Service.

#### *Right to restriction of processing*

You may request us to restrict processing of personal data for example when your data erasure, rectification or objection requests are pending and/or when we do not have legitimate grounds to process your data. This may however lead to fewer possibilities to use our Service.

#### *Right to data portability*

You have the right to receive your personal data from us in a structured and commonly used format and to independently transmit those data to a third party.

#### *How to use the rights*

The above mentioned rights may be used by sending a letter or an e-mail to us on the addresses set out above. We may request the provision of additional information necessary to confirm your identity.

We reserve the right to reject requests that are unreasonably repetitive, excessive or manifestly unfounded.

### **DIRECT MARKETING**

Notwithstanding any consent granted beforehand for the purposes of direct marketing, you have the right to prohibit us from using your personal data for direct marketing purposes, market research and profiling made for direct marketing purposes by contacting us on the addresses indicated above or by using the unsubscribe possibility offered in connection with any direct marketing messages.

### **INFORMATION SECURITY**

We use administrative, organizational, technical, and physical safeguards to protect the personal data we collect and process. Our security controls are designed to maintain an appropriate level of data confidentiality, integrity, availability, resilience and ability restore the data. We regularly test our systems, and other assets for security vulnerabilities.

Should despite of the security measures, a security breach occur that is likely to have negative effects on your privacy, we will inform you and other affected parties, as well as relevant authorities when required by applicable data protection laws, about the breach as soon as possible.

### **LODGING A COMPLAINT**

In case you consider our processing of personal data to be inconsistent with the applicable data protection laws, a complaint may be lodged with the local supervisory authority for data protection.

In Finland, the local supervisory authority is the Data Protection Ombudsman (<https://www.tietosuojafi.fi>).