

SPORTACAM PRIVACY POLICY

Updated 11 May 2015

1. PERSONAL DATA FILE AND THE CONTROLLER

Name of the Personal Data File: Sportacam User Register

Controller: Sportacam Oy (Business ID 2630758-8), a company duly incorporated under in in Finland and having its principal place of business at Fredrikinkatu 61 A, 00100 Helsinki, Finland ("**Company**")

Contact email: [privacy@sportacam.com]

2. WE CARE FOR YOUR PRIVACY

2.1 This Privacy Policy is applied to processing of personal data concerning the users ("**User**", "**Users**") of the Sportacam website, the Sportacam service and any applications, including mobile applications, made available by the Company (together the "**Service**") and processed in context of the Sportacam User Register ("**User Register**"). This Privacy Policy describes the relevant principles and purposes related to processing of personal data by the Company

2.2 The Service may contain links to websites and services of third parties. These websites or services are subject to their own privacy policies as well as terms and conditions. The Company does not take any responsibility of third parties' privacy policies, terms and conditions or processing of personal data in such third parties' operations. The Company recommends paying attention to the then-current privacy policies and terms and conditions applied to processing of personal data by third parties.

3. CATEGORIES AND SOURCES OF PERSONAL DATA

3.1 Personal data means any information on a private individual and any information on his/her personal characteristics or personal circumstances, where these are identifiable as concerning him/her or the members of his/her family or household. Such personal data may include without limitation the name and contact information of the User, the User's mobile ID, any data uploaded by the User to the Service as well as other necessary information collected by the Service to identify the User and enable the use and successful functioning and use of the Service.

3.2 As a rule, the personal data processed by the Company is provided by the User in context of using the Service. The Company stores the data when a User signs up for the Service, uses the Service and uploads content to the Service.

4. THE PURPOSE OF THE PROCESSING OF PERSONAL DATA

4.1 Processing of personal data in the User Register is primarily based on the User's consent. By signing up for the Service or providing his/her data, the User consents to processing of the User's personal data by the Company for the purposes set out in this Privacy Policy.

4.2 The personal data stored in the User Register may be used to provide, develop and customize the Service and to communicate with the User. Such communication may

include direct marketing, market research or research polls by the Company, its customers and co-operation partners.

- 4.3 The Company may use subcontractors when providing the Service or other services. When necessary and to the extent required for the provision of the Service or other services, personal data may be transferred outside of the European Union or European Economic Area. In such occasion the Company shall comply with the requirements of the applicable law concerning such transfer of personal data.

5. COMMUNICATION OF PERSONAL DATA TO THIRD PARTIES

- 5.1 The Company may communicate and disclose the Users' personal data to its co-operation partners and other third parties when this is necessary for the provision of the Service or the purposes of processing personal data set out herein or when the disclosure is based on an obligation under the applicable law or a need to defend the legitimate interests of the Company in accordance with the applicable law or to the extent otherwise permitted by applicable laws. Further, for clarification, the Company notes that any content and material uploaded by the User to the Service may be disclosed to third parties.

6. QUALITY OF DATA

- 6.1 Where required by the applicable law, the Company rectifies, erases or supplements possibly erroneous, unnecessary, incomplete or obsolete data processed in the User Register at the request of the data subject concerned. However, a User is responsible for the validity and quality of the personal data he/she provides to the Company. A User also is responsible for notifying the Company of any possible changes in the personal data provided by the User. The User is advised to contact the Company by using the contact information set out above in this Privacy Policy.

7. DATA SECURITY

- 7.1 The personal data contained in the User Register is protected against unauthorized access, against accidental or unlawful destruction, manipulation, disclosure and transfer and against other unlawful processing by appropriate technical and organisational measures.

8. COOKIES

- 8.1 Cookies are files which are received and transmitted by a User's device when the User is using the Service or other services. The Company may use cookies and similar techniques to provide the Service and other services, to improve their quality and to enhance their user experience. By using the Service, other services and consenting to the use of cookies in his/her browser settings User consents to the use of cookies by The Company. The User may prohibit the use of cookies by changing the browser settings. This may, however, affect the user experience of the services or the Service.

9. USER RIGHTS

- 9.1 A User has the right to prohibit the Company to process personal data stored in the User Register for the purposes of direct advertising, other direct marketing, market research and opinion polls. The Company advises the User to notify the Company using the contact information set out above in this Privacy Policy of such prohibition.
- 9.2 Further, after having supplied sufficient search criteria a User has the right to access the data on him/her stored in the User Register and to obtain, upon request, a copy

of such data. Such request shall be made in a personally signed document which can be addressed to Company using the contact information set out above in this Privacy Policy.

10. CHANGES TO THE PRIVACY POLICY

- 10.1 The Company may amend this Privacy Policy and the related information. The Company recommends that the User regularly accesses the Privacy Policy to obtain knowledge of any possible changes to it. The Company shall use its reasonable efforts to inform the User of such amendments by posting the amended Privacy Policy at the Company's website at www.sportacam.com, via the Company's applications or via other means.