

# Privacy Notice

**Last Updated:** May 8, 2025

## **Business Made Agile Oy**

Business registration number:

3334687-6



**BUSINESS MADE AGILE**

WWW.BUSINESSMADEAGILE.COM

# Privacy Notice

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This Privacy Notice describes how **Business Made Agile Oy** (hereinafter referred to as "we," "us," or "our") collects, uses, discloses, and processes the personal data of our business clients, their employees, and other individuals we interact with in the course of providing our software as a service, consulting, and other professional services. This notice applies to individuals located in the European Economic Area (EEA) subject to the General Data Protection Regulation (GDPR), California residents subject to the California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA), and individuals in Thailand subject to the Personal Data Protection Act B.E. 2562 (2019) (PDPA).

We are committed to protecting your privacy and ensuring the security of your personal data. Please read this notice carefully to understand our practices.

## 1. Who We Are

**Business Made Agile Oy** is a privately owned company registered in Finland (Business registration number: 3334687-6) with its principal place of business at:

**Lemminkäisentie 32, 28330 Pori, Finland**

For the purposes of GDPR, we act as a data controller with respect to the personal data we collect and process for our own business purposes, such as managing our client relationships and marketing our services. When we process personal data on behalf of our business clients in the provision of our services, we typically act as a data processor. Our obligations as a data processor are governed by our agreements with our clients.

## 2. Personal Data We Collect

We may collect and process the following categories of personal data:

- **Contact Information:** This includes names, job titles, email addresses, phone numbers, and business addresses of our clients' employees and representatives.
- **Account Information:** If you use our software as a service, we may collect usernames, passwords, and other login credentials.
- **Business Information:** This includes information about your company, your role, and your interactions with us.
- **Service Usage Data:** Information about how you and your users access and use our software as a service, including login times, features used, and data processed through the service.
- **Communication Data:** Records of our correspondence with you, including emails, chat logs, and call recordings (where permitted by law and with your consent where required).

- **Marketing Data:** If you have consented to receive marketing communications, we may collect your preferences and information related to our marketing activities.
- **Technical Data:** This may include IP addresses, browser types, operating systems, device information, and other technical details collected when you interact with our website or services.
- **Professional Service Data:** Information provided by you or your company in connection with the consulting and other professional services we provide, which may include sensitive personal data depending on the nature of the services. We will only process sensitive personal data with your explicit consent or as permitted by applicable law.

### 3. How We Collect Personal Data

We collect personal data in the following ways:

- **Directly from You:** When you or your company engage our services, communicate with us, register for our software as a service, subscribe to our marketing communications, or interact with our website.
- **From Your Company:** We may receive personal data about your employees and representatives from your company in connection with the services we provide.
- **Automatically:** When you use our website or software as a service, we may automatically collect certain technical data using cookies and similar tracking technologies. Please refer to our Cookie Policy for more information.
- **From Third Parties:** We may receive personal data from publicly available sources, business partners, or other third parties, where permitted by applicable law.

### 4. Purposes of Processing Personal Data

We process your personal data for the following purposes:

- **Providing and Managing Our Services:** To deliver our software as a service, consulting, and other professional services to our clients, including account management, technical support, and service improvement.
- **Communication:** To communicate with you regarding our services, respond to your inquiries, and provide important updates.
- **Client Relationship Management:** To manage our relationship with your company, including billing, contract management, and customer service.
- **Marketing and Business Development:** To send you information about our services, industry insights, and events that may be of interest to you, where you have provided your consent or where permitted by legitimate interest.
- **Improving Our Website and Services:** To analyze how our website and services are used and to make improvements.
- **Security and Fraud Prevention:** To maintain the security of our systems and protect against fraud or other illegal activities.
- **Legal and Regulatory Compliance:** To comply with applicable laws, regulations, and legal processes.
- **Other Legitimate Business Purposes:** To support our day-to-day business operations.

## 5. Legal Basis for Processing Personal Data

Our legal basis for processing your personal data will depend on the specific context and the type of personal data involved. These bases may include:

- **Contractual Necessity:** Processing is necessary for the performance of a contract with your company or to take steps at your company's request prior to entering into a contract.
- **Legitimate Interests:** Processing is necessary for our legitimate interests, such as providing and improving our services, marketing our business, and ensuring the security of our systems, provided that these interests are not overridden by your rights and freedoms.
- **Consent:** We may rely on your explicit consent to process certain types of personal data, such as for direct marketing communications or the processing of sensitive personal data. You have the right to withdraw your consent at any time.
- **Legal Obligations:** Processing is necessary for us to comply with our legal obligations.

## 6. Disclosure of Personal Data

We may disclose your personal data to the following categories of recipients:

- **Our Affiliates:** To our subsidiaries or affiliated companies for the purposes described in this Privacy Notice.
- **Service Providers:** To third-party service providers who assist us in providing our services, such as hosting providers, payment processors, analytics providers, and marketing service providers. These providers are contractually obligated to protect your personal data.
- **Business Partners:** To business partners in connection with the services we provide to your company.
- **Legal Authorities:** To law enforcement agencies, regulatory bodies, or other governmental authorities when required by law or legal process.
- **Professional Advisors:** To our lawyers, accountants, auditors, and other professional advisors.
- **In Connection with Business Transfers:** In the event of a merger, acquisition, or other business transaction, your personal data may be transferred to the acquiring entity.

## 7. International Data Transfers

Your personal data may be transferred to and processed in countries outside of your country of residence, which may have different data protection laws than your jurisdiction. We will implement appropriate safeguards to ensure the protection of your personal data in accordance with applicable data protection laws, including:

- **GDPR:** We may transfer personal data to countries recognized by the European Commission as providing an adequate level of data protection, or we will implement Standard Contractual Clauses approved by the European Commission.

- **CCPA/CPRA:** We will only transfer personal data in compliance with the requirements of the CCPA/CPRA.
- **PDPA:** We will ensure that transfers to foreign countries comply with the requirements of the PDPA, including transferring to countries with adequate data protection standards or implementing appropriate safeguards.

## 8. Data Security

We have implemented reasonable technical and organizational measures designed to protect your personal data from unauthorized access, use, disclosure, alteration, or destruction. These measures include encryption, access controls, firewalls, and regular security assessments. However, no method of transmission over the internet or method of electronic storage is completely secure, and we cannot guarantee absolute security.

## 9. Data Retention

We will retain your personal data for as long as necessary to fulfill the purposes for which it was collected, including for the duration of our business relationship with your company, as required by applicable laws and regulations, or as necessary to protect our legal rights and interests. The specific retention period will depend on the nature of the personal data and the purposes for processing.

## 10. Your Rights

Under the GDPR, CCPA/CPRA, and PDPA, you may have certain rights regarding your personal data, which may include:

- **Right to Access:** You may have the right to request access to the personal data we hold about you.
- **Right to Rectification:** You may have the right to request that we correct any inaccurate or incomplete personal data.
- **Right to Erasure (Right to be Forgotten):** In certain circumstances, you may have the right to request that we erase your personal data.
- **Right to Restriction of Processing:** You may have the right to request that we restrict the processing of your personal data in certain circumstances.
- **Right to Data Portability:** You may have the right to receive your personal data in a structured, commonly used, and machine-readable format and to transmit it to another controller.
- **Right to Object:** You may have the right to object to the processing of your personal data in certain circumstances, including for direct marketing purposes.
- **Rights under CCPA/CPRA:**
  - **Right to Know:** You have the right to know what personal information we collect, use, disclose, and sell.
  - **Right to Opt-Out of Sale or Sharing:** You have the right to opt out of the sale or sharing of your personal information. We do not currently "sell" your personal information as defined under the CCPA/CPRA.

- **Right to Limit Use and Disclosure of Sensitive Personal Information:** You have the right to direct us to only use your sensitive personal information for limited purposes.
- **Right to Non-Discrimination:** You have the right not to receive discriminatory treatment for exercising your CCPA/CPRA rights.
- **Rights under PDPA:**
  - **Right to be Informed:** You have the right to be informed about the collection and use of your personal data.
  - **Right to Access:** You have the right to access your personal data.
  - **Right to Rectification:** You have the right to have your inaccurate personal data corrected.
  - **Right to Erasure (Right to be Forgotten):** You have the right to have your personal data erased, under certain circumstances.
  - **Right to Restriction of Processing:** You have the right to restrict the processing of your personal data.
  - **Right to Data Portability:** You have the right to receive your personal data in a commonly used and machine-readable format.
  - **Right to Object:** You have the right to object to the processing of your personal data.
  - **Rights in relation to Automated Decision-Making:** You have the right not to be subject to a decision based solely on automated processing which produces legal effects concerning you or similarly significantly affects you.
  - **Right to Withdraw Consent:** If we rely on your consent for processing, you have the right to withdraw your consent at any time.

To exercise any of these rights, please contact us using the contact information provided below. We may need to verify your identity before processing your request.

## 11. Cookies and Similar Technologies

Our website uses cookies and similar tracking technologies to enhance your browsing experience and collect information about how you use our site. You can manage your cookie preferences through your browser settings. Please refer to our Cookie Policy for more detailed information.

## 12. Links to Other Websites

Our website may contain links to other websites that are not operated by us. We are not responsible for the privacy practices of these third-party websites. We encourage you to review the privacy policies of any website you visit.

## 13. Updates to this Privacy Notice

We may update this Privacy Notice from time to time to reflect changes in our practices or applicable laws. We will post any changes on our website and update the "Last Updated" date at the top of this notice. We encourage you to review this notice periodically.

## 14. Contact Us

If you have any questions or concerns about this Privacy Notice or our data processing practices, or if you wish to exercise your rights, please contact us at:

### **Data Protection Officer/Privacy Team**

Jorma Manninen

[hello@businessmadeagile.com](mailto:hello@businessmadeagile.com)

+358 454 909 454

Mail to:

### **Business Made Agile Oy**

**Lemminkäisentie 32, 28330 Pori, Finland**

## 15. Supervisory Authorities

If you are located in the EEA and believe that we have infringed your data protection rights, you have the right to lodge a complaint with a competent supervisory authority in your country of residence or place of work.

If you are a California resident and have concerns about our privacy practices, you have the right to lodge a complaint with the California Privacy Protection Agency (CPPA).

If you are located in Thailand and believe that we have infringed your data protection rights under the PDPA, you have the right to lodge a complaint with the Personal Data Protection Committee (PDPC)