

# Privacy Policy

This Privacy Policy is based on the EU General Data Protection Regulation (GDPR, EU 2016/679) and the Finnish Data Protection Act (1050/2018). It applies to the personal data registers maintained by MeshWorks Wireless Oy, including customer, service user, and newsletter registers.

## **MeshWorks Wireless Oy**

**Last updated: August 28, 2025**

MeshWorks Wireless Oy (“MeshWorks,” “we,” “our”) is committed to protecting your privacy and processing personal data responsibly, transparently, and in compliance with applicable data protection laws. This Privacy Policy explains how we collect, use, store, and protect personal data across our brands:

- **Seemoto** – Asset tracking & cold chain management
- **FeelPlace** – Smart buildings & indoor air quality
- **Fourdeg** – Smart heating solutions
- **SensUrban** – Immersive city visualization & digital twins

## **1. Registrar**

### **MeshWorks Wireless Oy**

Business ID: 2119271-8

Hatanpään valtatie 48, 33900 Tampere, Finland

Email: [info@mww.fi](mailto:info@mww.fi)

Phone: +358 20 792 8970

## **2. Data Protection Contact**

For all matters concerning data privacy, please contact:

### **Name**

MeshWorks Wireless Oy

Seemoto Customer Support

### **Data Protection Officer / Privacy Contact**

Email: [support@seemoto.com](mailto:support@seemoto.com)

Phone: +358 20 792 8972

### 3. Registers Maintained

MeshWorks Wireless maintains the following personal data registers:

1. **Customer Register** – for managing customer relationships, contracts, and billing
2. **Service User Register** – for managing user accounts and providing access to IoT services.
3. **Newsletter Register** – for delivering newsletters and marketing communications

### 4. Purposes of Processing

We process personal data only for lawful purposes, including:

- Providing and managing services under our brands
- Fulfilling contractual obligations
- Customer support and communication
- Marketing communications (based on consent or legitimate interest)
- Complying with legal obligations

### 5. Categories of Data Processed

#### Customer Register

- Name, company, business ID, title and role
- Postal address, email address, phone number
- Billing details, payment information, invoicing history
- Contract details and service agreements
- Customer communication records (support tickets, emails, calls)

#### Service User Register

- Name, email address, username / user ID
- Service access credentials and permissions
- Device identifiers, IP address, browser type and version, operating system
- Service usage data and log files (timestamps, login/logout, error reports)
- Customer organization linked to the user account
- User settings and preferences within the service

## **Newsletter Register**

- Email address
- Subscription status (active/inactive)
- Consent records (opt-in, opt-out, date and method of subscription)
- Preferred topics or segments (if applicable)

## **6. Sources of Data**

Data is collected primarily from:

- The customer or user directly (e.g., account creation, service use, newsletter subscription)
- Customer support interactions
- Contractual documents and service usage logs

## **7. Data Sharing & Third Parties**

We do not sell personal data. Data may be shared only with trusted service providers for purposes such as:

- **Email and marketing platforms**
- **Analytics and web services**
- **CRM and billing systems**

All third parties act as processors under GDPR and are bound by data processing agreements ensuring adequate safeguards.

## **8. International Transfers**

Data is generally stored within the EU/EEA. If data is transferred outside the EU/EEA (e.g., to cloud providers), such transfers are based on GDPR-compliant safeguards, such as EU Standard Contractual Clauses (SCCs).

## **9. Data Retention**

- Customer data is retained for the duration of the customer relationship and as required by law.
- Service user data is retained while the user account is active. Data is deleted or anonymized when the account is closed.
- Newsletter data is retained until the subscription is cancelled.

## 10. Data Security

We implement organizational and technical measures to protect personal data, including:

- Access control with user-specific accounts and roles
- Secure data storage in EU-based or GDPR-compliant cloud services
- Encryption and monitoring of systems

## 11. Rights of the Data Subject

Under GDPR, you have the following rights:

- **Access** – to know what data we hold about you
- **Rectification** – to correct inaccurate or incomplete data
- **Erasure** – to request deletion of your data (“right to be forgotten”)
- **Restriction** – to limit processing in certain cases
- **Portability** – to receive your data in a structured, machine-readable format
- **Objection** – to object to processing based on legitimate interest or direct marketing
- **Withdrawal of consent** – at any time where processing is based on consent

Requests can be submitted by contacting our Data Protection Officer (see section 2).

## 12. Updates to This Policy

We may update this Privacy Policy from time to time. The latest version will always be available on our website. Significant changes will be communicated to registered customers and users.