

# Privacy Notice and Cookie Policy of SomeBuddy

## Privacy Notice

The purpose of this privacy notice ("Privacy Notice") is to explain how and why Somis Enterprises Oy ("SomeBuddy") collects, uses and shares personal data in SomeBuddy service (the "Service"). This Privacy Notice applies to persons (the "Customer") reporting to SomeBuddy on an unpleasant situation encountered in social media (the "Social Media Violation"). Customers may be individuals who have encountered a Social Media Violation or representatives of an organization reporting a Social Media Violation occurring within the organization. This Privacy Notice also applies, in so far as applicable, to persons who may be identified from the reported Social Media Violation.

### DATA CONTROLLER

Somis Enterprises Oy ("SomeBuddy")  
Business ID: 2837159-1  
Email: [info@somebuddy.com](mailto:info@somebuddy.com)

SomeBuddy is the "data controller" under the data protection legislation. SomeBuddy is responsible for ensuring that personal data is processed in accordance with this Privacy Notice and applicable data protection legislation.

The primary contact person for any privacy related issues is:

Kaisa Rissanen  
Somis Enterprises Oy  
Email: [info@somebuddy.com](mailto:info@somebuddy.com)

### WHY PERSONAL DATA IS PROCESSED AND ON WHAT BASIS

SomeBuddy processes personal data for the following purposes:

#### (1) Providing the Service

The purpose of processing personal data is to provide the Service, which includes the handling of the reported Social Media Violation and related legal advice to resolve the Social Media Violation.

- a) Processing of the Customer's personal data is based on the Customer's consent. The Customer is entitled to withdraw consent in accordance with section 8 of this Privacy Notice at any time. Please note, however, that the withdrawal of consent while the

Social Media Violation is still being handled means that the case will be closed, as handling is not possible without personal data. Similarly, the withdrawal of consent does not affect the lawfulness of the case handling prior to the withdrawal.

A child (under 13 years old) may also report a Social Media Violation in the Service. Also in these situations the processing of personal data is based on the Customer's consent. In accordance with the applicable data protection legislation the consent of the holder of parental responsibility is not required in the context of preventive or counseling services offered directly to a child (GDPR, Recital 38). The Service is a legal counselling service of the kind mentioned above to resolve Social Media Violations.

- b) Representatives of an organization may report on the Service a Social Media Violation, targeting a person other than the Customer, that has occurred in the organization. In this situation, the processing of (other than the Customer's) personal data is based on SomeBuddy's legitimate interest to provide legal advice to organizations in solving Social Media Violations where it is not possible to provide such advice without the processing of personal data. There is a wider public interest in addressing and solving Social Media Violations, in particular against children and adolescents. In order to ensure the protection of privacy, SomeBuddy has assessed and weighed the legitimate interest by means of the balance test in accordance with the instructions of the Office of the Data Protection Ombudsman. If you would like more information regarding the assessment of the legitimate interest and the balance test, please contact SomeBuddy using the contact details mentioned in section 1.

## **(2) Service development**

SomeBuddy processes personal data to develop the Service. In this respect, the processing of personal data is based on SomeBuddy's legitimate interest in teaching the artificial intelligence used by the Service, enhancing the customer experience, service and information security of the Service. Only pseudonymous or completely anonymous information is used to teach artificial intelligence. If you would like more information regarding the assessment of the legitimate interest, please contact SomeBuddy using the contact details mentioned in section 1.

## **(3) Marketing**

SomeBuddy processes personal data of its customers in order to handle sales and marketing activities related to the business of SomeBuddy. In this regard, the purpose of the processing of personal data is, among other things, to enhance the Customer's awareness of SomeBuddy's service, collecting feedback from Customers, conducting opinion and market research, marketing SomeBuddy's service and sending event invitations.

In respect of Marketing, the processing of personal data is based on the Customer's consent, which the Customer is entitled to withdraw at any time in accordance with Section 8 of this Privacy Note. SomeBuddy does not target direct marketing to children (under 13 years old).

## **WHAT PERSONAL DATA IS COLLECTED**

SomeBuddy may process the following personal data about the Customer on the Service:

- Customer's contact information, such as phone number
- Customer's unique pseudonym or another identifier, if applicable
- Customer's description of the Social Media Violation, including but not limited to
  - o Customer's age;
  - o the age of the suspected offender;
  - o the description of the Social Media Violation;
  - o the estimated time of the Social Media Violation;
  - o consequences and/or harmful impacts;
  - o the social media where the Social Media Violation occurred; and
  - o other parties involved.
- SomeBuddy's instruction to resolve the Social Media Violation and information relating to the communication
- Possible settlement agreement and/or report to the Police

Personal data is collected from the Customer itself. The use of the service is entirely voluntary and SomeBuddy processes the Social Media Violation according to the information provided by the Customer. Therefore, it is not mandatory to provide personal data, but the extent of personal data may affect the content of the Service.

Representatives of an organization may report on the Service a Social Media Violation, targeting a person other than the Customer, that has occurred in the organization. SomeBuddy does not intend to identify the persons involved in the Social Media Violation and SomeBuddy aims to guide the representatives of an organization to describe the Social Media Violation anonymously so that the persons involved in the Social Media Violation are not identifiable. However, SomeBuddy is unable to ensure that the description of the Social Media Violation does not contain information from which persons could be indirectly identified or inferred through the combining of information.

In principle, the Service does not collect information about specific categories of personal data but, as an exception, such information may be contained or derived from other personal data provided by the Customer, if the Customer mentions, for example, health information in the description about the Social Media Violation.

## **WHERE DO WE COLLECT YOUR DATA**

Data to be stored in the Service are obtained from the Customer in connection with the use of the Service.

## SHARING PERSONAL DATA

SomeBuddy may share the Customers' personal data with third parties, as detailed below:

- Trusted service providers, such as IT service providers acting on behalf of SomeBuddy that do not have an independent right to use the personal data that SomeBuddy shares with them;
- When legally obliged to share information, such as presenting or in relation to a litigation; and
- If SomeBuddy is involved in a merger or acquisition.

## INTERNATIONAL TRANSFERS

SomeBuddy or a service provider acting on behalf of SomeBuddy may process your personal data outside of the European Economic Area (e.g. to the United States). When we process personal data outside the European Economic Area, we use approved, well-established safeguards, such as European Commission model contractual clauses whereby our service provider undertakes to take appropriate data protection measures to protect your personal data.

## RETENTION OF YOUR PERSONAL DATA

SomeBuddy will only retain personal data for as long as is necessary for the purposes described in this Privacy Policy. As a rule, personal data are retained for the duration of the handling of Social Media Violation. Personal data will be deleted no later than two (2) years after the last contact with the Customer.

## YOUR RIGHTS

The Customer and other people who may be identified in the Social Media Violation are entitled to, in accordance with the applicable data protection legislation:

- require accessing personal data we hold about you;
- require correcting any inaccuracy or mistakes in your personal data;
- require us to delete personal data concerning you;
- object to processing of personal data, for example, based on a legitimate interest of SomeBuddy
- receive your personal data in machine readable format and transfer them to another data controller in case that you have provided such personal data yourself.

In addition, you have the right to withdraw your consent to the processing of your personal data at any time.

The above rights shall be exercised in accordance with and to the extent required by data protection law.

The above requests should be sent by email to: [info@somebuddy.com](mailto:info@somebuddy.com)

## **RIGHT TO COMPLAIN TO SUPERVISORY AUTHORITY**

The Customer and other people, who may be identified in the Social Media Violation, have the right to complain to the competent supervisory authority, if they consider that their personal data has not been processed in accordance with applicable data protection laws. In Finland the competent supervisory authority is The Office of the Data Protection Ombudsman (*Tietosuojavaltuutetun toimisto*).

## **SECURITY OF YOUR PERSONAL DATA**

SomeBuddy has taken appropriate technical and organizational security measures to protect your personal data against destruction, misuse and unauthorized access. We limit access to your personal data to only such employees and contractors who, in their job, need access to that information, and service providers who may only process the data in accordance with SomeBuddy's instructions. All persons having access to personal data are bound by the obligation of confidentiality.

## **CHANGES**

SomeBuddy reserves the right to change and update the Privacy Notice. If we make changes to this Privacy Notice, we will add this on the website where you will also find the most updated version of this Privacy Notice.

This Privacy Policy was drawn up on 23rd May 2018.

This Privacy Policy has been updated on 27th May 2019 and 3rd September 2020.

This Privacy Policy was translated from Finnish into English on 3rd September 2020.

# Cookie Policy

This cookie policy ("Cookie Policy") explains how Somis Enterprises Oy ("SomeBuddy") uses cookies on its website and how you can control the use of cookies on your device.

## WHAT ARE COOKIES?

A cookie is a small piece of data which is stored on your device when you visit certain websites. Cookies help website owners to recognize your device when you visit a website, and they remember useful details from your previous visits improving your user experience. Cookies are used on most websites, including our website.

We do not use cookies to personally identify the user of our website. If this happens, we make sure that the cookies are processed in accordance with the applicable data protection legislation and our Privacy Policy.

## WHY DO WE USE COOKIES?

We use cookies

- to enhance your browsing experience on our website
- to remember your previous choices in case you want to return to the same page during the same session, for example to continue filling out a form
- to ensure the information security of our sites
- to produce statistics on the use of our websites

## WHAT TYPE OF COOKIES DO WE USE?

We use on our websites the following cookies:

### Necessary cookies

These cookies are required for the website to work and they cannot be disabled. Necessary cookies are used, for example, to remember your cookie preferences and to access features of the website, such as our webshop.

### Functional cookies

These cookies enable us to provide additional functionalities, such as the support-chat on our website. These cookies may be set by us or by a third party. If you do not accept these cookies, some features may not work properly (for example, you won't be able to chat with us).

### Measurement and analytics cookies

These cookies collect anonymous statistics on how users use our website. Measurement and analytics cookies can, for example, help us understand how users navigate or move around our site and which parts of the site are used the most. Even though these cookies may sound the most alarming ones – don't worry – we can't see who exactly is doing what on our website. It's all visible to us only in numbers and statistics.

**Other third-party cookies**

Our websites may also contain social media cookies. These cookies allow you to share what you have done on our website with social media services such as Facebook, Twitter and LinkedIn. We are not responsible for such cookies. We use Google Analytics and Facebook Pixel on our website to analyze how users behave on our website. So please read carefully the cookie and privacy policies of those third parties.

**HOW LONG THE COOKIES ARE STORED ON MY DEVICE?**

Cookies are divided into two groups based on how long they are stored on the visitor's device.

**Session cookies**

Session cookies only concern a specific session, so they are deleted when you close your web-browser. Session cookies are not stored on the hard drive of your device.

**Persistent cookies**

Persistent cookies will remain stored on your computer until you delete them, or they expire. We store the data collected with persistent cookies at most two years.

**HOW CAN I CONTROL COOKIES OR BLOCK THEM?**

You may choose to manage the extent to which you consent to the use of cookies by changing your cookie settings on our website. In addition, you can accept or refuse cookies by adjusting your browser settings and you can clear your cookie history in your browser settings. The targeted third-party advertising may be blocked in its entirety or on a company-specific basis through [Your Online Choices](#) website.

Please note that blocking cookies may mean that some functions of our website may not work on your device and you may be unable to access certain areas of the website.

**I HAVE FURTHER QUESTIONS ABOUT COOKIES, WHO CAN I CONTACT?**

If you would like to learn more about the use of cookies on our website, please contact us: [info@somebuddy.com](mailto:info@somebuddy.com).