

# Lumia Mind Privacy policy

Lumiamind Oy ("Lumiamind Oy," "Lumia Mind," "We," or "Us") respects your privacy and is dedicated to protecting the privacy of those persons using the Lumia Mind mobile application ("Service" or "App"). This Privacy Policy helps you to understand what personal information/data ("Personal Information") and non-personal information we collect and how we use it in the Lumia Mind mobile Application. This Privacy Policy shall apply to your use of the Services, and you should read this document before using the Services. This Privacy Policy is incorporated into and is subject to the Lumia Mind Terms of Service. If you do not agree to the terms of this Privacy Policy, please do not use the Services.

Lumiamind Oy provides a general audience Service, and we restrict the use of our Service to individuals aged 18 and above. We do not knowingly collect, maintain, or use personal information from children under the age of 18.

“Personal Information” refers to information that allows users to be specifically identified as individual persons. We may also collect “non-personal information,” meaning it cannot be used to specifically identify any persons. We collect and use both types of information, as well as combinations of both types. Lumiamind Oy shall not be responsible for the actions of third parties (including people, companies, or services), the content of third-party websites, the usage of the information provided by users to such third parties, or any products or services they may offer.

## Processing Personal Information

Lumia Mind will only collect Personal Information relevant for the purposes described in this Privacy Policy. We may process your Personal Information for carefully considered and specific purposes which are in our interests and enable us to enhance the services we provide, but which we believe also benefit our customers.

We process personal information for certain legitimate business purposes, which include some or all of the following:

- Where the processing enables us to enhance, modify, personalize, or otherwise improve our services/communications for the benefit of our customers
- To identify and prevent fraud
- To enhance the security of our network and information systems
- To better understand how people interact with our websites
- To determine the effectiveness of promotional campaigns and advertising.
- Whenever we process data for these purposes, we will ensure that we always keep your Personal Data rights in high regard and take account of these rights.

PLEASE NOTE: By creating a user account, you accept the processing of your personal information and cannot object to the processing anymore.

Personal information may be processed for the purposes of creating Service accounts, facilitating transactions, using, maintaining, customizing, and developing the Services, contacting users, providing services, sending customer and marketing information to users, enabling communication in the Services, conducting research, and creating reports. Lumiamind Oy may use collected information to create a user profile.

Lumiamind Oy commits to adhere to the EU General Data Protection Regulation (GDPR) as well as the provisions of the Finnish Personal Data Act (Henkilötietolaki) and other applicable laws and regulations pertaining to the processing of Personal Information. All personnel processing Personal Information are obliged to keep such information strictly confidential.

## **Information We May Collect and Sources of Information**

We collect several categories of information:

Information You give to us:

When you create a user account, we collect your name and email address. When you make a purchase through our website, we collect your name, email address, address, and phone number.

Technically gathered information when you use our Services:

This information may include the time of your last use of the Service and your location based on your IP address.

We use a third-party email provider (Aweber), which will collect your name and email address. You can review their legal policies here: <https://www.aweber.com/legal.htm>.

Notwithstanding anything else in this policy, we may work with partners who use mobile SDKs, including the OneSignal Messaging SDK, to passively collect information ("SDK Information") which generally helps us deliver personalized notifications. This data may also be used to identify you uniquely across other devices or browsers for customizing ads or content. Depending on the permissions granted to this application, this information may include personally identifiable information (PII), such as your email address. It may also include precise location data (i.e., GPS-level data), WiFi information, apps you have installed and enabled, and your mobile identifier (e.g., Android Advertising ID).

## **Consumer Control & Opt-Out Options**

Opting-out of OneSignal Push Notifications:

You may, in most cases, opt-out of receiving push notifications by going to your device settings, selecting "Notifications," and then changing those settings for some or all of

the apps on your device. We have provided a link to your settings from within the app: "Profilini" -> "Asetukset" (Different device configurations or updates to devices may affect or change how these settings work).

Lumia Mind may collect information on users' activities in the Services, such as purchase history.

## **Disclosing and Hosting Information**

By using the Services, you always disclose information about yourself to Lumiamind Oy. In connection with your use of the Services, including communication in the Services, you will disclose data about yourself to other users, and any such data is public information with no expectation of privacy. Lumiamind Oy is not responsible for any personal data you choose to make public in the Services. Lumiamind Oy will not disclose your stored Personal Information to third parties for direct marketing, market research, polls, or public registers without your consent.

We may use external service providers to provide technical solutions or services for processing stored information and access the stored information using a technical interface. Your Personal Information may be shared with third-party service providers only to the extent necessary to perform, improve, or maintain the Services. Lumiamind Oy may use third-party service providers such as email service providers and credit card processors. Lumiamind Oy has the right to share Personal Information as necessary for these service providers to provide their services to Lumiamind Oy. Lumiamind Oy is not liable for the actions of these third parties.

In exceptional circumstances, Personal Information may be disclosed to third parties if required under applicable law or regulation, or by order of competent authorities, or to enforce the Terms and Conditions of the Services, and to investigate possible infringing use of the Services, as well as to guarantee the safety of the Services.

Lumia Wellness will retain critical data for a minimum of six years after the user's last activity on the service. Non-critical data may be deleted earlier.

### **Transfers to third countries**

Lumia Mind processes your data within the EU/EEA. However, the name and email address of those on the email list are transferred to software outside the EU or the European Economic Area:

Aweber email marketing program (Active Campaign is committed to the EU Privacy Shield standard). You can review their legal policies at:

<https://www.aweber.com/legal.htm>.

No other data is transferred outside the EU or the European Economic Area.

## **Protection of Information**

The register will be maintained on external service providers' servers with appropriate safeguards, such as password protection, granting access to the stored information only to Lumia Mind personnel working at Lumiamind Oy. The register is protected by industry-standard technical and organizational safety measures. The database will be accessible only to those persons expressly authorized by Lumiamind Oy.

Although we make good faith efforts to store the information collected on the services in a secure operating environment that is not available to the public, we cannot guarantee the absolute security of that information during its transmission or its storage on our systems. Lumiamind Oy will post a notice on the Lumia Mind website or through the Services in case of a material security breach that endangers your privacy or Personal Information. Lumiamind Oy may also temporarily shut down a service to protect Personal Information.

## Your Rights

You have the right to be informed of the Personal Data processed by Lumiamind Oy, and the right to rectification/correction, erasure, and restriction of processing. You also have the right to receive from us a structured, common, and machine-readable format of the Personal Data you provided to us.

When a user wishes to exercise these rights, they should send a signed request to Lumiamind Oy using the contact details below. Lumiamind Oy will, on its own initiative or upon the user's request, complement, correct, or delete incomplete, inaccurate, or outdated Personal Information.

Please send your request to: [info@lumiamind.fi](mailto:info@lumiamind.fi)

You may opt out of receiving promotional emails by following the instructions in those emails. If you opt out, Lumiamind Oy may still send you non-promotional customer information, such as emails about your account or providing the Service.

In addition, you have the right to lodge a complaint with the data protection authority in your jurisdiction.

## Changes to the Privacy Policy

Lumiamind Oy may change this Privacy Policy from time to time at its sole discretion. All changes will be made available on this website, which is why Lumiamind Oy encourages users to frequently check this page for any changes. Changes will not prejudice users' rights without their consent.

## Controller and the persons in charge

The User may at any time contact Lumia Wellness at the address here below.

**Contact info:**

Lumiamind Oy

Sini Mustikkamaa-Kelly and Piia Mustikkamaa-Jokelainen

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<https://lumiamind.fi/>