

## CARROT KITCHEN – PRIVACY POLICY

This privacy policy ("**Privacy Policy**") is applicable to personal data processed in connection with Carrot Revolution Oy's ("**Carrot Revolution**" or "**we**") Carrot Kitchen service and to personal data collected from the visitors of Carrot Revolution's website(s) ("**Website(s)**").

Definitions:

- "**Service**" refers to the Carrot Kitchen service available through the App and the Website.
- "**App**" refers to the Carrot Kitchen mobile app.
- "**Customer**" refers to the parent or custodian who has registered to the Service and has a user account in the Service.
- "**User**" refers to the person using the App through Customer's user account.
- "**Visitor**" refers to visitor of the Website.
- "**You**" refers to Customer, User and/or Visitor.

Please note that we only process personal data regarding the Customers and Visitors. The information processed regarding Users is not personal data within the meaning of the applicable laws.

We may update this Privacy Policy if it is necessary in order to reflect the changes in data processing practices or otherwise. You can find the current version on the Website. We will not make substantial changes to this Privacy Policy or reduce the rights of the data subjects under this Privacy Policy without providing a notice thereof.

This Privacy Policy applies to processing of personal data carried out by Carrot Revolution as a data controller.

### 1 CONTACT DETAILS

Name: Carrot Revolution Oy

Company ID: 2862487-8

Correspondence address: Maria 01, Lapinlahdenkatu16, 00180 Helsinki, Finland

Phone number: +358 (0)50 339 5450

E-mail address: [info@carrotrevolution.fi](mailto:info@carrotrevolution.fi)

[www.carrotrevolution.fi/en](http://www.carrotrevolution.fi/en)

Contact person:

Olli Freese

+358 (0)50 339 5450

[info@carrotrevolution.fi](mailto:info@carrotrevolution.fi)

### 2 PERSONAL DATA PROCESSED AND SOURCES OF DATA

The personal data collected and processed by us in connection with subscription to the Service and the use of the Website(s) can be divided into three data categories: Customer Data, User Data and Analytics Data. **Please note, that User Data is not personal data.**

#### Customer Data

We collect and process the following types of information of our Customers and Visitors:

- Customer's name and home address
- Customer's and Visitor's e-mail address (from Visitor only in connection with subscription of newsletter)
- Customer's phone number
- Customer's billing and payment information
- restrictions regarding the Service that the Customer has set to Users
- Customer's and Visitor's marketing opt-out and opt-ins
- communication between Carrot Revolution and Customer or Carrot Revolution and Visitor when Customer or Visitor is in contact with us for example via phone or e-mail.

The abovementioned information is collected from Customers or Visitors themselves.

#### User Data

We do not collect personal data regarding Users. **Customer is responsible for ensuring that the User-related information added in the Service by the Customer or User is not in the form of personal data.**

We may process the following types of information of the Users:

- username (it is Customer's responsibility to ensure that the username is not User's real name)
- birth year and month
- gender
- restrictions on the use of Service related to the User
- possible pictures or other information the User adds in the Service or creates in the Service (Customer must instruct the User not to add for example pictures of himself/herself or other personal data in the Service)

#### Analytics Data

The data logging systems we use automatically collect certain analytics data ("**Analytics Data**") when you visit the Website or use the Service. Although we do not normally use Analytics Data to identify you as an individual, Customer can sometimes be recognized from it when combined with some Customer Data. In such situations, Analytics Data can also be considered personal data under applicable laws and we will treat such data as personal data. However, the Analytics Data collected from Users and Visitors is not personal data.

We may collect the following Analytics Data:

- **Device Information.** We collect the following information relating to the technical device you use when visiting the Website or using the App:
  - country
  - city
  - type of device
  - anonymized IP address
  - unique device ID
  - unique ID of the Customer and the User
  - session ID

- language settings
  - browser type and version
  - operating system
  - internet service provider
- **Usage Information.** We collect information on your use of the Service, such as:
- time spent in the Service
  - interaction with the Service
  - the time and date when you have used the Service
  - the sections of the Service you visited
  - your interactions with the content of the Service

### **Cookies and analytics services**

When you visit the Website, we collect and store Analytics Data in a variety of ways, including through cookies and other similar technologies.

Cookies are little text files which are sent and stored on your computer or mobile device when you visit the Website and whose information the Website can later read. Certain functions of the Website may not work properly without cookies. The cookies will not harm your device or files.

We use cookies to customize our Service and the information we provide to meet the needs of an individual Visitor. With the help of cookies, we are able to identify browsers visiting the Website, improve the usability of the Website and compile aggregate information about Visitors.

We use for example Google Analytics, Hotjar and Amplitude on our Website to compile Analytics Data and reports of the use of the Website so that we can improve our services.

With the help of Google Analytics we can for example collect information of from what website have you moved to the address, what part of the Website have you scrolled and when and in which city you use our webservices, which browser you use and what is the resolution of your screen and the operating system. We do not look at the information individually but as a whole, so that for example when designing Websites, we can build it so that it works quickly and smoothly on the most popular devices and browsers. More information of Google Analytics you can find on [Google Analytics' website](#). It is possible to opt-out of Google Analytics with the following browser add-on tool [Google Analytics opt-out add-on](#).

You may choose to set your web browser to refuse cookies or to alert when cookies are being sent. For example, the following links provide information on how to adjust the cookie settings on some popular browsers:

[Safari](#)  
[Google Chrome](#)  
[Internet Explorer](#)  
[Mozilla Firefox](#)

Please note that some parts of our Service may not function properly if use of cookies is refused.

You can find more information on cookies and similar technologies e.g. through the following links:

<https://www.kyberturvallisuuskeskus.fi/en/our-activities/regulation-and-supervision/confidential-communications>  
<http://www.youronlinechoices.eu>

### **3 PURPOSES AND LEGITIMATE GROUNDS FOR THE PROCESSING OF YOUR PERSONAL DATA**

#### **Purposes**

Carrot Revolution processes personal data in accordance with this Privacy Policy for the following purposes:

*To provide the Service (legal ground: performance of a contract and in some cases legitimate interest)*

*Carrot Revolution processes personal data to be able to offer the Service to Customers and Users.*

If you contact our customer service, we will use the information provided by you to answer your questions or solve your problems relating to our Service.

*For our legal obligations (legal ground: compliance with a legal obligation)*

We can process data to enable us to administer and fulfil our obligations under law. We may process data for complying with our bookkeeping obligations and providing information to relevant authorities such as tax authorities.

*For claims handling and legal processes (legal ground: legitimate interest)*

Carrot Revolution may process personal data in relation to claims handling and legal processes. We may also process data for the prevention of fraud, misuse of our Service and for data, system and data network security.

*For customer communication and marketing (legal ground: legitimate interest)*

Carrot Revolution processes personal data to contact Customers regarding the Service and to inform them of changes relating to them. Personal data are also used for the purposes of marketing the Service and our other services to Customers and Visitors.

*For quality improvement and trend analysis (legal ground: legitimate interest)*

We may also process information about your use of the Service to improve the quality of the Service e.g. by analyzing any trends in the use of the Service. When possible, we will do this using only aggregated, non-personally identifiable data.

In order to ensure that our services are in line with individual Customer's needs, personal data can be used for things like customer satisfaction surveys.

#### **Legal grounds for processing**

Carrot Revolution processes your personal data to comply with legal obligations and perform our contractual obligations towards Customers. Furthermore, we process Customer's and Visitor's personal data to pursue our legitimate interest to run, maintain and develop our business and to create and maintain customer relationships. When choosing to use your data on the basis of our legitimate interests, we weigh our own interests against Customer's and Visitor's right to privacy and e.g. provide Customers and Visitors with possibility to easily opt-out from our marketing communications.

In some parts of the Service, Customer may be requested to grant their consent for the processing of personal data. In this event, Customer may withdraw their consent at any time.

#### **4 TRANSFERS TO COUNTRIES OUTSIDE EUROPE**

Carrot Revolution stores your personal data primarily within the European Economic Area. We and/or our service providers may transfer your personal data to, or access it in, countries outside the European Economic Area or the Customer's or Visitor's domicile.

We will take steps to ensure that the personal data receives an adequate level of protection in the jurisdictions in which they are processed. We provide adequate protection for the transfers of personal data to countries outside of the European Economic Area through a series of agreements with our service providers based on the [Standard Contractual Clauses](#) or through other appropriate safeguards, such as the [Privacy Shield Framework](#).

#### **5 RECIPIENTS**

We only share personal data within our organization as far as reasonably necessary for the purposes of this Privacy Policy.

We do not share personal data with third parties outside our organization unless one of the following circumstances applies:

*For the purposes set out in this Privacy Policy and to authorized service providers*

To the extent that third parties need access to Customer's personal data in order for us to perform the Service to Customer and/or User, we provide such third parties with Customer Data to be processed on behalf of us. Furthermore, we may provide personal data to our affiliates or to authorized service providers who perform services for us (including storing data, accounting, sales and marketing) to process it for us.

When data is processed by third parties on behalf of Carrot Revolution, Carrot Revolution has taken the appropriate contractual and organizational measures to ensure that personal data are processed exclusively for the purposes specified in this Privacy Policy and in accordance with all applicable laws and regulations and subject to our instructions and appropriate obligations of confidentiality and security measures.

Please bear in mind that if you provide personal data directly to a third party, such as through a link, the processing is based on their policies and standards.

*For legal reasons and legal process*

We may share your personal data with third parties outside Carrot Revolution if we have a good faith belief that access to and use of the personal data is reasonably necessary to: (i) meet any applicable

law, regulation and/or court order; (ii) detect, prevent or otherwise address fraud, crime, security or technical issues; and/or (iii) protect the interests, properties or safety of Carrot Revolution, the Users of the Service or the public as far as in accordance with the law. When possible, we will inform you about such processing.

#### *For other legitimate reasons*

If Carrot Revolution is involved in a merger, acquisition or other business transaction, we may transfer your personal data to the third party involved. However, we will continue to ensure the confidentiality of all personal data. We will give notice to all the data subjects concerned when the personal data are transferred or become subject to a different privacy policy.

#### *With your explicit consent*

We may share your personal data with third parties outside Carrot Revolution when we have Customer's or Visitor's explicit consent to do so. The Customer or Visitor has the right to withdraw this consent at all times.

## **6 STORAGE PERIOD**

Carrot Revolution does not store your personal data longer than is legally permitted and necessary for the purposes provided in this Privacy Policy. The storage period depends on the nature of the information and on the purposes of processing. The maximum period may therefore vary per use.

Some of the Customer Data is deleted in two months following the deletion of Customer's user account. We can store some essential Customer Data, such as Customer's contact or payment data and communication data as long as such processing is required by law or is reasonably necessary for our legitimate interest such as claims handling, bookkeeping, internal reporting, reconciliation or other legal action purposes. All of the Customer's personal data is deleted within 10 years from the termination of the membership or Customer's last contact with us, unless processing is by way of exception necessary for example for legal actions.

Customer's and Visitor's e-mail address is stored for direct marketing purposes until further notice, if Customer or Visitor has given their consent for direct marketing. If Customer or Visitor later opts out of the direct marketing, we delete other information regarding the direct marketing, but will retain the information that Customer or Visitor has opted out of the direct marketing to ensure compliance with the opt-out.

## **7 YOUR RIGHTS**

### *Right to access*

You have the right to access and obtain a copy of your personal data processed by us. We may refuse to provide you with a copy of your data in case doing so would adversely affect the rights and freedoms of others.

### *Right to withdraw consent*

In case the processing is based on a consent granted by you, you may withdraw the consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

### *Right to rectify*

You have the right to have incorrect or incomplete personal data we have stored about you corrected or completed.

### *Right to erasure*

You may also ask us to delete your personal data from our systems. We will comply with such request unless we have a legitimate ground to not delete the data.

### *Right to object*

You may have the right to object on grounds relating to your particular situation to the processing of your personal data based on our legitimate interest. We will comply with such objection unless we have a legitimate ground not to. If you object to the further processing of your personal data, this may lead to fewer possibilities to use the Service.

### *Right to restriction of processing*

You may request us to restrict processing of personal data for example when your data erasure, rectification or objection requests are pending and/or when we do not have legitimate grounds to process your data. This may however lead to fewer possibilities to use the Service.

### *Right to data portability*

You have the right to receive all your personal data in a structured and commonly used format and to independently transmit those data to a third party.

### *How to use your rights*

The abovementioned rights may be used by sending a letter or an e-mail to us on the addresses set out above with the following information: whole name, address, e-mail and telephone number. We may request the provision of additional information necessary to confirm your identity. We may reject requests that are unreasonably repetitive, excessive or manifestly unfounded.

## **8 DIRECT MARKETING**

You have the right to object to and prohibit us from using your personal data for direct marketing purposes and profiling made for market research purposes or direct marketing purposes by contacting us on the addresses indicated above or by using the unsubscribe possibility offered in connection with any direct marketing messages. Where you object to processing of your personal data for direct marketing purposes, the personal data will no longer be processed for such purposes.

## **9 LODGING A COMPLAINT**

In case the Customer considers our processing of personal data to be inconsistent with the applicable data protection laws, a complaint may be lodged with the local supervisory authority for data protection. In Finland, the local supervisory authority is the Data Protection Ombudsman ([www.tietosuoja.fi](http://www.tietosuoja.fi)).

## **10 INFORMATION SECURITY**

We use administrative, organizational, technical, and physical safeguards to protect the personal data we collect and process. Measures include for example, where appropriate, encryption, pseudonymization, firewalls, secure facilities and systems protected with restricted access rights. Our security controls are designed to maintain an appropriate level of data confidentiality, integrity, availability, resilience and ability to restore the data.

Should despite of the security measures, a security breach occur that is likely to have negative effects to your privacy, we will inform the relevant data subjects as well as relevant authorities when required by applicable data protection laws, about the breach as soon as possible.