

# 2023.04.24. Privacy Notice

## Privacy Policy

We process data about identified or identifiable individuals, which is called personal data, with due care and in accordance with applicable data protection law.

This Privacy Policy describes how we, Nomentia, process personal data we collect from individuals in relation to their use of our websites, ordering and use of our services and attendance at our events (collectively, our “Services”). In legal terms, we are the data controller, as we determine the means and/or purposes of the processing.

This Privacy Policy does not apply to personal data mentioned on business documents that our customers transmit to our systems when using our Services. In legal terms, we are the data processor of such personal data, and our customers are the data controllers. Please see [Nomentia Contract | Appendices](#) for the data processing agreement regarding our cloud services. For data subject requests regarding personal data in the cloud services provided by Nomentia, please contact the administrative users of the cloud service in your organization.

This Privacy Policy only covers data processing carried out by Nomentia. The Privacy Policy does not address, and we are not responsible for, the privacy practices of any third parties, also in cases where Services include hyperlinks to third parties’ websites or when cookies are set by third parties.

### Personal Data

The personal data we collect from individuals using our Services (“Users”) mostly consists of user data, such as name, business function, gender, business address, telephone number, email address and other personal data Users provide to us. This is mostly information in relation to an individual’s role at his/her company that does not concern him/her as a private person or as an individual consumer customer. These companies that individuals are working for, mostly are our prospects, customers, suppliers or partners. The specific kind of user data collected will depend on the Services used.

We may also collect technical data in relation to Users, such as IP address, browser type and version, preferred language, geographic location, operating system and computer platform, the full URL clickstream to, through, and from our Services, including date and time, websites accessed immediately before and after visiting our websites, services Users viewed or searched for while using our Services, and parts of our Services that Users have visited. Although we do not normally use technical data to identify individuals, sometimes individuals can be recognized from it, either alone or when combined or linked with user data. In such situations, technical data can also be personal data under applicable law, and we will treat the combined data as personal data.

We use various technologies to collect and process technical data in relation to Users, including cookies. Cookies are small text files stored on Users’ computer by the internet browser. Cookies allow us to calculate the aggregate number of people using our Services and monitor the use of our Services. This helps us to improve our Services and better serve our Users. We may also use cookies that make the use of the Services easier, for example by remembering usernames, passwords and preferences. We may use tracking and analytics cookies to see how well our Services are being received by our Users. Some cookies enable our Services to function and inform us whether our Services are functioning properly. Our advertising cookies allow us to deliver targeted advertising to people who visit our websites (online behavioral advertising OBA). Users may choose to set their web browser to refuse cookies or to alert when cookies are being sent. This can usually be done through the internet browser’s settings. Information about how to manage cookies can be found online. Some parts of our Services may not function properly if Users prefer not to accept the use of cookies.

When visiting Nomentia web site, Users are presented with a cookie declaration that requests Users to give their consent on the types of cookies that are collected. By default, only cookies that are necessary for the web site to operate are collected. Users may change or withdraw their consent any time by using the Privacy Trigger in the bottom-left corner.

Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

Name	Provider	Purpose	Maximum Storage Duration	Type
__cf_bm [x16]	<a href="#">Cash &amp; Treasury Management Solutions   Nomentia</a> <a href="#">f.hubspotusercontent30.net</a> <a href="#">Fonts.com   Find, Buy &amp; Download Best Fonts</a> <a href="#">hs-analytics.net</a> <a href="#">HubSpot   Software &amp; Tools for your Business - Homepage</a> <a href="#">hs-banner.com</a> <a href="#">hscollectedforms.net</a> <a href="#">hsforms.com</a> <a href="#">hsforms.net</a> <a href="#">hs-scripts.com</a> <a href="#">HubSpot   Software &amp; Tools for your Business - Homepage</a> <a href="#">HubSpot   Software &amp; Tools for your Business - Homepage</a> <a href="#">hubspotusercontent.com</a> <a href="#">hubspotusercontent-na1.net</a> <a href="#">hubspotvideo.com</a> <a href="#">Cash &amp; Treasury Management Solutions   Nomentia</a>	This cookie is used to distinguish between humans and bots. This is beneficial for the website, in order to make valid reports on the use of their website.	Session	HTTP Cookie
__cfuid	<a href="#">Cash &amp; Treasury Management Solutions   Nomentia</a>	This cookie is a part of the services provided by Cloudflare - Including load-balancing, deliverance of website content and serving DNS connection for website operators.	Session	HTTP Cookie
__cfuid [x3]	<a href="#">hsforms.com</a> <a href="#">HubSpot   Software &amp; Tools for your Business - Homepage</a> <a href="#">Cash &amp; Treasury Management Solutions   Nomentia</a>	This cookie is a part of the services provided by Cloudflare - Including load-balancing, deliverance of website content and serving DNS connection for	Session	HTTP Cookie

		website operators.		
1.gif	<a href="https://imgscct.cookiebot.com">imgscct.cookiebot.com</a>	Used to count the number of sessions to the website, necessary for optimizing CMP product delivery.	Session	Pixel Tracker
CookieConsent [x3]	  	Stores the user's cookie consent state for the current domain	30 days	HTTP Cookie
embed/v3/counters.gif [x3]	   	Used to implement forms on the website.	Session	Pixel Tracker
li_gc		Stores the user's cookie consent state for the current domain	180 days	HTTP Cookie
SESS#		Preserves users states across page requests.	Session	HTTP Cookie
test_cookie		Used to check if the user's browser supports cookies.	Session	HTTP Cookie


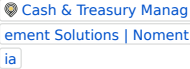
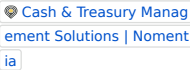
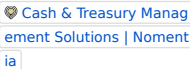
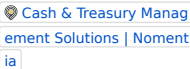
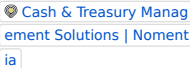
#### Preferences (1)

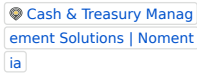
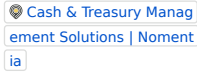

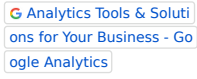
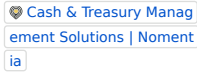
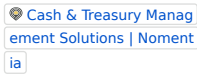
Preference cookies enable a website to remember information that changes the way the website behaves or looks, like your preferred language or the region that you are in.

Name	Provider	Purpose	Maximum Storage Duration	Type
CookieConsentBulkSetting-#	<a href="https://consentcdn.cookiebot.com">consentcdn.cookiebot.com</a>	Enables cookie consent across multiple websites	Persistent	HTML Local Storage

#### Statistics (14)

Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.


Name	Provider	Purpose	Maximum Storage Duration	Type
#_p	 Nomentia	This cookie is used to determine the number of times specific video content has been viewed. This is done by setting a specific ID for the visitor. The cookie also remembers any subscription choices made by the visitor.	Persistent	HTML Local Storage
__hssc	 Cash & Treasury Management Solutions   Nomentia	Identifies if the cookie data needs to be updated in the visitor's browser.	Session	HTTP Cookie
__hssrc	 Cash & Treasury Management Solutions   Nomentia	Used to recognise the visitor's browser upon reentry on the website.	Session	HTTP Cookie
__hstc	 Cash & Treasury Management Solutions   Nomentia	Sets a unique ID for the session. This allows the website to obtain data on visitor behaviour for statistical purposes.	180 days	HTTP Cookie
_dc_gtm_UA-#	 Cash & Treasury Management Solutions   Nomentia	Used by Google Tag Manager to control the loading of a Google Analytics script tag.	Session	HTTP Cookie
_ga	 Cash & Treasury Management Solutions   Nomentia	Registers a unique ID that is used to generate statistical data on how the	400 days	HTTP Cookie






		visitor uses the website.		
_ga_#		Used by Google Analytics to collect data on the number of times a user has visited the website as well as dates for the first and most recent visit.	400 days	HTTP Cookie
_gid		Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	Session	HTTP Cookie
AnalyticsSyncHistory		Used in connection with data-synchronization with third-party analysis service.	30 days	HTTP Cookie
collect		Used to send data to Google Analytics about the visitor's device and behavior. Tracks the visitor across devices and marketing channels.	Session	Pixel Tracker
hubspotutk		Sets a unique ID for the session. This allows the website to obtain data on visitor behaviour for statistical purposes.	180 days	HTTP Cookie
In_or		Registers statistical data on users' behaviour on the website. Used for internal	Session	HTTP Cookie


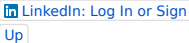


		analytics by the website operator.		
sliguid		Contains an visitor ID - This is used to track visitors' navigation and interaction on the website for internal website-optimization.	1 year	HTTP Cookie
slirequested		Contains an visitor ID - This is used to track visitors' navigation and interaction on the website for internal website-optimization.	1 year	HTTP Cookie

#### Marketing (40)



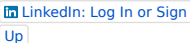



Marketing cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third party advertisers.

Name	Provider	Purpose	Maximum Storage Duration	Type
#-#		Used to track user's interaction with embedded content.	Session	HTML Local Storage
__hmpl	<a href="http://static.hsappstatic.net">static.hsappstatic.net</a>	Collects information on user preferences and/or interaction with web-campaign content - This is used on CRM-campaign-platform used by website owners for promoting events or products.	Session	HTML Local Storage



__ptq.gif	 <a href="#">HubSpot   Software &amp; Tools for your Business - Home page</a>	Sends data to the marketing platform Hubspot about the visitor's device and behaviour. Tracks the visitor across devices and marketing channels.	Session	Pixel Tracker
__Secure-ROLLOUT_TOKEN	 <a href="#">YouTube</a>	Pending	180 days	HTTP Cookie
_fbp	 <a href="#">Cash &amp; Treasury Management Solutions   Nomentia</a>	Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers.	3 months	HTTP Cookie
_gcl_a	 <a href="#">Cash &amp; Treasury Management Solutions   Nomentia</a>	Used by Google AdSense for experimenting with advertisement efficiency across websites using their services.	3 months	HTTP Cookie
ads/ga-audiences	 <a href="#">Google</a>	Used by Google AdWords to re-engage visitors that are likely to convert to customers based on the visitor's online behaviour across websites.	Session	Pixel Tracker
api/audience/profile	<a href="#">ttcontacts.com</a>	Collects data on visitor interaction with the website's video-content. This data is used to make the website's video-content more relevant towards the visitor.	Session	Pixel Tracker










bcookie		Used by the social networking service, LinkedIn, for tracking the use of embedded services.	1 year	HTTP Cookie
bscookie		Used by the social networking service, LinkedIn, for tracking the use of embedded services.	1 year	HTTP Cookie
HUBLYTICS_EVEN TS_53	<a href="http://static.hsappstatic.net">static.hsappstatic.net</a>	Collects data on visitor behaviour from multiple websites, in order to present more relevant advertisement - This also allows the website to limit the number of times that they are shown the same advertisement.	Session	HTML Local Storage
IDE		Used by Google DoubleClick to register and report the website user's actions after viewing or clicking one of the advertiser's ads with the purpose of measuring the efficacy of an ad and to present targeted ads to the user.	1 year	HTTP Cookie
iU5q-!O9@\$		Registers a unique ID to keep statistics of what videos	Session	HTML Local Storage




		from YouTube the user has seen.		
LAST_RESULT_EN TRY_KEY		Used to track user's interaction with embedded content.	Session	HTTP Cookie
li_sugr		Collects data on user behaviour and interaction in order to optimize the website and make advertisement on the website more relevant.	3 months	HTTP Cookie
lidc		Used by the social networking service, LinkedIn, for tracking the use of embedded services.	Session	HTTP Cookie
LogsDatabaseV2 :V#  LogsReques tsStore		Used to track user's interaction with embedded content.	Persistent	IndexedDB
NID		Registers a unique ID that identifies a returning user's device. The ID is used for targeted ads.	6 months	HTTP Cookie
pagead/1p-user- list/#		Tracks if the user has shown interest in specific products or events across multiple websites and detects how the user navigates between sites. This is used for measurement of	Session	Pixel Tracker

		advertisement efforts and facilitates payment of referral-fees between websites.		
pagead/1p-user-list/396792599		Pending	Session	Pixel Tracker
pagead/landing [x2]	 	Collects data on visitor behaviour from multiple websites, in order to present more relevant advertisement - This also allows the website to limit the number of times that they are shown the same advertisement.	Session	Pixel Tracker
remote_sid		Necessary for the implementation and functionality of YouTube video-content on the website.	Session	HTTP Cookie
site_identity	<a href="https://scout.salesloft.com">scout.salesloft.com</a>	Collects data on user behaviour and interaction in order to optimize the website and make advertisement on the website more relevant.	1 year	HTTP Cookie
slireg		Registers user behaviour and navigation on the website, and any interaction with active campaigns. This is used for optimizing	7 days	HTTP Cookie

		advertisement and for efficient retargeting.		
TESTCOOKIEENABLED	 YouTube	Used to track user's interaction with embedded content.	1 day	HTTP Cookie
UserMatchHistory	 LinkedIn: Log In or Sign Up	Ensures visitor browsing-security by preventing cross-site request forgery. This cookie is essential for the security of the website and visitor.	30 days	HTTP Cookie
uuid	 Nomentia	Used to track visitors on multiple websites, in order to present relevant advertisement based on the visitor's preferences.	Persistent	HTML Local Storage
uuid	 Nomentia	This cookie is used to optimize ad relevance by collecting visitor data from multiple websites - this exchange of visitor data is normally provided by a third-party data-center or ad-exchange.	3 months	HTTP Cookie
VISITOR_INFO1_LIVE	 YouTube	Tries to estimate the users' bandwidth on pages with integrated YouTube videos.	180 days	HTTP Cookie

YSC		Registers a unique ID to keep statistics of what videos from YouTube the user has seen.	Session	HTTP Cookie
ytidb::LAST_RES ULT_ENTRY_KEY		Stores the user's video player preferences using embedded YouTube video	Persistent	HTML Local Storage
YtidbMeta#data bases		Used to track user's interaction with embedded content.	Persistent	IndexedDB
yt-remote-cast- available		Stores the user's video player preferences using embedded YouTube video	Session	HTML Local Storage
yt-remote-cast- installed		Stores the user's video player preferences using embedded YouTube video	Session	HTML Local Storage
yt-remote- connected- devices		Stores the user's video player preferences using embedded YouTube video	Persistent	HTML Local Storage
yt-remote- device-id		Stores the user's video player preferences using embedded YouTube video	Persistent	HTML Local Storage
yt-remote-fast- check-period		Stores the user's video player preferences using embedded YouTube video	Session	HTML Local Storage
yt-remote- session-app		Stores the user's video player preferences using embedded YouTube video	Session	HTML Local Storage

yt-remote-session-name		Stores the user's video player preferences using embedded YouTube video	Session	HTML Local Storage
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## Purposes

We process personal data for the following purposes:

- to allow us to run, maintain and develop our business,
- to allow us to offer and provide our Services,
- to allow us to conduct information and promotional campaigns (including direct marketing) related to our Services (including by phone, mail and email), keeping Users informed about our Services and special offers that are likely to interest them,
- to allow us to perform the contract we have signed with our customers, suppliers or partners,
- to allow customer service management, e.g. when Users contact our service desk,
- to allow contract management, e.g. to address our invoices to our customers,
- to enhance our Services and the use thereof,
- to perform research and analysis relating to our Services,
- to perform tracking of the use of our Services,
- to conduct market surveys and/or
- to detect fraud, e.g. breaches of intellectual property rights.

Should the personal data of the User be provided to us via our prospect, customer, supplier or partner, we shall assume that our prospect, customer, supplier or partner has informed the User of this Privacy Policy.

## Storage Period

We do not store the personal data for longer than is legally permitted and necessary for the related processing purposes. The storage period depends on the type of personal data, the purposes, and the applicable law and therefore varies per use.

Typically, we store User's personal data for as long as the user is using our Services or for as long as we have another purpose to do so and, thereafter, for no longer than is required or permitted by law or necessary for internal reporting and reconciliation purposes.

We erase personal data after the above-described storage period or when the User requests us to erase his/her personal data.

## Legitimate grounds for processing

We process personal data to pursue our legitimate interest to run, maintain, and develop our business. Furthermore, we process personal data to comply with our legal obligations.

In some parts of our Services, we might request Users' consent for the processing of their personal data for specific purposes. In that event, Users may withdraw their consent at any time.

## **Rights of Users**

Right to access. Any User may contact us to get confirmation as to whether or not we are processing User's personal data. Where we do process User's personal data, we will inform User of what categories of personal data we process regarding him/her, the processing purposes, the categories of recipients to whom personal data have been or will be disclosed and the envisaged storage period or criteria to determine that period.

Right to withdraw consent. In case our processing is based on a consent granted by the User, the User may withdraw the consent at any time by contacting us or by using the functionalities of our Services. Withdrawing a consent may lead to fewer possibilities to use our Services.

Right to rectification. Any User has the right to have inaccurate or incomplete personal data we store about the User rectified or completed.

Right to object. In case our processing is based on our legitimate interest to run, maintain and develop our business, any User has the right to object at any time to our processing. We shall then no longer process User's personal data unless for the provision of our Services or if we demonstrate other compelling legitimate grounds for our processing that override User's interests, rights and freedoms or for legal claims. Notwithstanding any consent granted beforehand for direct marketing purposes, any User has the right to prohibit us from using his/her personal data for direct marketing purposes, by contacting us or by using the functionalities of the Services or unsubscribe possibilities in connection with our direct marketing messages.

Right to restriction of processing. Any User has the right to obtain from us restriction of processing of User's personal data, as foreseen by applicable data protection law, e.g. to allow our verification of accuracy of personal data after User's contesting of accuracy or to prevent us from erasing personal data when personal data are no longer necessary for the purposes but still required for User's legal claims or when our processing is unlawful. Restriction of processing may lead to fewer possibilities to use our Services.

Right to data portability. Any User has the right to receive User's personal data from us in a structured, commonly used and machine-readable format and to independently transmit those data to a third party, in case our processing is based on User's consent and carried out by automated means.

Right to erasure. Any User has the right to have personal data we process about the User erased from our systems if the personal data are no longer necessary for the related purposes, if we have unlawfully processed the personal data or if the User objects to processing for direct marketing. Any User furthermore has the right to erasure if the User withdraws consent or objects to our processing as meant above, unless we have a legitimate ground to not erase the data. We may not immediately be able to erase all residual copies from our servers and backup systems after the active data have been erased. Such copies shall be erased as soon as reasonably possible.

How to use these rights. To exercise any of the above mentioned rights, User should primarily use the functions offered by our Services. If such functions are however not sufficient for exercising such rights, Customer shall send us a letter or email to the address set out below under Contact, including the following information: name, address, phone number, email address and a copy of a valid proof of identity. We may request additional information necessary to confirm User's identity. We may reject requests that are unreasonably repetitive, excessive or manifestly unfounded.

## **Security**

We implement and maintain reasonable and appropriate technical and organizational security measures to protect the personal data we process, from unauthorized access, alteration, disclosure, loss or destruction.

We regularly audit the application of our security measures and we ask third party experts to review our security controls. These audits help us to further improve our security level. Please read our [information security white paper](#) to learn how Nomentia ensures the confidentiality, integrity and availability of personal data.

Should despite of our security measures, a security breach occur that is likely to result in a risk to the data privacy of Users, we will inform the relevant Users and other affected parties, as well as relevant authorities when required by

applicable data protection law, about the security breach as soon as reasonably possible.

## **Recipients**

We only share personal data within our organization if and as far as necessary for the purposes specified in this Privacy Policy. Our staff members processing personal data are bound to confidentiality.

We do not share personal data with any third party outside of our organization unless one of the following circumstances applies.

Necessary for the purposes. We may share personal data with third parties to the extent our Services foresee such disclosure and Users submit their personal data for that purpose, to facilitate our Services. We may furthermore share personal data with service providers that support us in the realization of the purposes specified in this Privacy Notice, such as by performing data hosting, direct marketing, and customer services. Our agreements with these service providers foresee privacy and security commitments from these service providers that are no less protective than our own commitments described in this Privacy Notice. If our Users provide personal data directly to a third party, such as through a link on our website, the processing is typically based on such third party's notice.

For legal reasons. We may share personal data with third parties if we have a good-faith belief that their access to and use of the personal data is necessary (i) to meet any applicable law and/or court order, (ii) to detect, prevent, or otherwise address fraud, security or technical issues, and/or (iii) to protect the interests, properties or safety of us, our users or the public, in accordance with the law. We will notify Users about such disclosure, as far as reasonably possible.

In relation to corporate restructuring. If we are in a process of merger, acquisition, or asset sale, we may transfer personal data to the involved third party. We continue to ensure the confidentiality of all personal data.

Upon User's consent. We may share personal data with third parties for other reasons than the ones mentioned above if we obtained User's explicit consent to do so. The User has the right to withdraw this consent at any time.

## **Location and transfer**

We and our service providers have operations in several locations in the world. Consequently, we and our service providers may transfer personal data to, or access it from, countries outside User's country of domicile.

We take steps to ensure that Users' personal data receives an adequate level of protection in the countries in which we process it.

We process personal data within the EU/EEA region.

We use the following tools to process personal data:

- Zendesk for processing customer support inquiries and incidents, [www.zendesk.com](http://www.zendesk.com)
- Salesforce for customer contract management and invoicing, [www.salesforce.com](http://www.salesforce.com)
- Hubspot for web site and marketing communications management, [www.hubspot.com](http://www.hubspot.com)

For further information on how personal data is processed in the above mentioned tools, please visit the respective privacy policy and related information on their web pages.

In case our processing is subject to any EU data protection law and Users' personal data is transferred from the European Economic Area to a service provider for processing in any country outside the European Economic Area that is not recognized by the EU Commission as providing an adequate level of protection for personal data, we provide for appropriate safeguards by EU Commission's standard contractual clauses or by any other appropriate safeguard as foreseen under the applicable data protection law.

### **Lodging a complaint**

In case any User considers our processing of his/her personal data to be inconsistent with applicable data protection law, a complaint may be lodged with the local supervisory authority for data protection.

### **Changes**

This Privacy Policy is dated April 24, 2023. We may update this Privacy Policy at any time if required in order to reflect changes in our data processing practices, in personal data protection laws, or otherwise. For substantial changes to this Privacy Policy, we will use reasonable endeavors to provide notice thereof.

### **Contact**

Any User having any question or request on this Privacy Notice or our privacy practices, can contact us:

Nomentia Data Protection Officer (DPO)

by email at:

[privacy@nomentia.com](mailto:privacy@nomentia.com)

by mail at:

Nomentia Oy

Linnoitustie 6 C, 02600 Espoo, Finland

### **Related information**

[Job Applicant Privacy Policy](#)

[Information about cookies](#)

[Phishing and Malware](#)

### **Useful links:**

[Security at Nomentia](#)