

Privacy Notice

Last revised: 20 Jan, 2024

Introduction and summary

To whom does this privacy notice apply?

This privacy notice explains how ForteAI processes personal data regarding customers and previous customers, company representatives, sales prospects, participants at events and educational events, job applicants seeking employment at ForteAI, and end users of our websites and apps that contact us via email, chat, or by phone.

Data Controller and contact

ForteAI Ltd (“ForteAI,” “us,” “we”) is a Nordic SaaS supplier of a robust platform that helps companies identify, visualize, rewrite resumes, and match skills, further enabling them to optimize the use of their resources. Our contact information is under “Contact us” in this Privacy Notice.

Summary of our purposes

We use personal data for the following primary purposes:

- Providing services and products you have ordered, trial service, arranging events, networks, and courses you have signed up for, and sending you newsletters you subscribe to. This also includes processing your payments, sending invoices, verifying your identity as needed, communicating with you about our terms and updates, and providing user accounts.
- Customer service
- Customer and market surveys
- Analytics and product improvement/development
- Direct marketing, including profiling.
- Security, dispute settlements, and enforcement of our agreements and terms.

Please read more about our purposes under the section “How we use personal data.”

Our website can be accessed without creating a Company or User account. However, we generate cookies, which can later be used for marketing purposes.

To ensure that that privacy policy correctly reflects what is stated in national and international data policy regulations, this privacy notice can come under examination and be subject to change. Furthermore, we highly regard input and feedback from our customers about this privacy notice. Any feedback received from our customers can come to affect the points below. If you have any questions or concerns, please contact us at hello@forte.so

1. Data Controller

1.1. This privacy notice regards the privacy practices of ForteAI Ltd reg. no FI33164589

If you have any questions regarding our processing of your personal data, you can contact us at:

ForteAI Ltd, reg. no FI33164589

Address: Penttiläntö 1 A, Joensuu, Finland

<https://forte.so>

2. The personal data we compile

2.1. The data we collect about you will vary depending on which services you use, whether you visit our social media or our website. The data we compile may include the following:

Name and contact details such as company email and mobile number

- Authentication details such as username and password
- Settings, any information added to your account
- Work-related information such as title, role, company, organization
- Payment information may include means of payment
- Purchase history may include your previous subscriptions to our services, amounts, time of purchase, and any offer that you have accepted.
- Unit data includes information about your device, whether it is a laptop, phone, or other device, browser type, language settings, IP number, and software configurations.
- User data on how you use our digital services, trial offers, and webpages, such as data indicating your level of activity in your account and the features you use, time and date of log-in, and how you interact with us through social media, such as our company page on LinkedIn, Facebook and company channel on Youtube.
- Public, professional information such as your professional profile on your company homepage, LinkedIn profile from LinkedIn/Microsoft
- Public, professional information from another professional network relevant to your position
- Communication with us, whether it is our customer success team, HR department, or a general inquiry, including content in your messages in the chat, by email or via phone, feedback, questions you submit for review, etc.
- Food preferences or allergies in case we arrange for an in-person event.
- Log data such as information about the product you logged in to, date, time, IP address, and any error messages.
- Recruitment information such as qualifications, education, references from former employers, etc., if you apply for a position with us.

2.2. You can always contact us and request information about how we process your personal data and request the erasure of your personal data. If you ask us not to contact you through email, we will keep your email on a “do-not-send” list to fulfill your request.

3. How we process your personal information

3.1. The data we collect about you will vary depending on which services you use, the settings on your device, and which functions you use.

3.2. Here, we will describe the purposes for which we use personal data and which legal basis we use. Primarily, we will process your data on the legal basis that our processing of the data is necessary for the performance of a contract with you, or taking steps to enter into a contract with you (“Contract”), or necessary for the purpose of our legitimate interest (“Legitimate Interest”). In some cases, we will base our processing on your consent (“Consent”) or on a legal obligation that we are subject to (“Legal Obligation”).

3.3. We process your data for the following purposes:

Providing services and products to you and administering our customer relations to you or the company that you represent

- When you sign up for our service and a trial, we will store your personal data to provide our services to you or the company you represent.
- Create and manage user accounts in our services.
- Customize content and give a more personalized experience of our services and customer success chat.
- We may contact you by email, telephone, chat, push-function in our services, or otherwise to provide you with information relevant to using our services, such as renewals, offers, or abandoned sign-up processes.
- Participation in company events
- If you are a customer, display your Company profile and users to other customers as relevant to your preferences and use of our Network and Partner module.

Legal basis: our processing of your personal data for this purpose is based on the performance of our Contract with you. Any food allergies or preferences are processed with your Consent. Any photographs or videos of events will be processed based on our Legitimate Interest.

Customer service

We may process your personal data when you communicate with us so we can respond to your requests, queries, feedback, and complaints.

Legal basis: we process your personal data to be able to fulfill the Contract with you if you are a customer. For non-customers, we have a Legitimate Interest in processing your personal data to respond to your questions and handle complaints and requests.

To better understand our business (Business analytics)

We use personal data to analyze and improve our existing services and products by, e.g., updating features and improving user experience. Error reports are used to improve security, search questions, etc. We use several tools, such as Google Analytics, to understand better how our websites are used to develop analyses based on that data. We use customer attribute data, website page view data, click data, and social media information to understand how users of our services are using the different functionalities. Such analyses will show the most popular pages and functions, how users navigate, and the most popular content on the webpage.

Legal basis: we motivate our processing of your personal data with our legitimate interest to improve and develop our services and website. We also ask for your consent for analytics cookies, for more information, see our cookie policy.

Marketing

We use various channels for marketing, including email, our website, and other digital channels. The personal data we have compiled about you, your company, name, title, e-mail, telephone number, and title collected from website visitors and signups for our service or service trial can be used to send direct advertising regarding our services and offers.

You always have the right to object to our direct marketing by contacting customer service. If you object to marketing, we will keep your information on a “do not send list” to ensure compliance with your request.

Legal basis: When applicable, we use personal data as necessary for our legitimate interest to give you personalized and relevant content and advertise our services to our existing customers. We also ask for your Consent for cookies, for more information, see our cookie policy.

Custom audience advertising on other platforms

We may use targeted marketing, so-called custom audience advertising, on **LinkedIn, Facebook, Google, and Twitter platforms**. If you are or have been a customer to us, we may use your email address to be able to show you ads of our services on the other platform or, if you have objected, to exclude you from such ads.

We use the Facebook pixel if you have consented to this in your cookie settings. The pixel is used to show you more relevant ads on the Facebook platform, including Instagram, and means that some data is shared with Meta. Facebook acts as a joint controller in this regard. You can read more about this under the section “How we share your data.”

You always have the right to object to our direct marketing by contacting customer service. If you object to marketing, we will keep your information on a “do not send list” to ensure compliance with your request.

Legal basis: When applicable, we use personal data as necessary for our legitimate interest to give you personalized and relevant content and advertise our services to our existing customers. We also ask for your Consent for cookies and the Facebook pixel to serve ads, for more information, see our cookie policy.

Recruitment and Career opportunities

If you apply for a job position, we will process your data, including name, e-mail, phone number, LinkedIn username, CV, academic records, work history, employment history, and references for our recruitment process. We may collect further information from additional sources, such as Recruitment agencies, Publicly available sources, or from references. Your personal data is used to match your skills with open job positions. If you are invited to an interview, we will collect more personal data from you. We may share your personal data with HR partners involved in the recruitment process.

Legal basis: our processing of your personal data for recruitment purposes is motivated by our legitimate interest, legal obligations, and your consent to process personal data necessary for the recruitment process.

Newsletters

If you sign up to receive our newsletter, news about our services, and other offers through email.

Legal basis: we will process your email to send you our newsletter based on the legal basis consent. You can, at any time, withdraw your consent to stop receiving the newsletter.

Security and enforcement of our agreements

We use information about our web visitors to protect our services from fraudulent behavior, to protect our customers, and for legal purposes such as dispute resolution and to maintain our agreements.

Legal basis: the processing is necessary for our legitimate interest to protect our systems and services.

Compliance

We use information to comply with applicable legislation in Finnish Law, and the GDPR, as well as court orders or authority decisions.

Legal basis: Legal Obligation.

New Purpose

We will inform you beforehand we intend to use personal data for any new purpose than those listed in this version of the Privacy Notice. If we are legally required, we will ask for your consent.

4. Recruitment

4.1. We collect personal data when you apply for job positions at ForteAI. We may collect personal data such as contact details, CVs, identification documents, academic records, work history, employment, and references.

4.2. We may also collect personal data from other parties connected to the recruitment process, e.g., Recruitment agencies, Publicly available sources online, or References or recommendations.

4.3. We use your personal data to match your previous experience and education with our open job opportunities. We share this information with relevant parties involved in the recruitment process. We will collect additional information from you if you are invited to the interview or subsequent stages of the recruitment process.

4.4. If we are legally obligated to provide a candidate with a suitable working environment and equipment, we may collect personal data regarding health status, which is considered a particular category of personal data. For example, we may need to collect information about a candidate's certain health status to provide a suitable working environment for that candidate if they are successful in their application.

5. Your rights

5.1. Generally, you have the right to have your data processed only in accordance with your expectations. But you also have rights laid down by applicable law, you can read more about them, first the ones we believe might be most relevant for you.

- You have the right to be informed about specific data processing details. You can also contact us if you want information regarding processing your personal data. Further, you are entitled to request full access to this information.
- Upon request, you have the right to receive a copy of the personal data we process about you. You can receive this data by reaching out to us.
- You have the right to correct the personal data we process about you if you see that it is inaccurate.
- You can withdraw your consent, allowing us to use cookies and similar technologies by changing your browser settings.
- You have the right to erase your personal data if:
 - the personal data is no longer necessary for the purposes it was collected for;

- your particular situation gives you the right to object to processing on grounds of legitimate interest (see more below);
- processing the personal data has been unlawful, or
- there is a legal obligation under EU or Finnish law for us to erase the data.
- You have the right to request us to restrict the processing of your data if:
 - the personal data we have about you is inaccurate;
 - the processing is unlawful, and you ask us to restrict the use of the personal data instead of erasing it;
 - we no longer need the personal data for the purposes of processing, but if we still need it for the establishment, exercise, or defense of legal claims or
 - you have objected to the processing, claiming that the legal basis of legitimate interest is invalid, and are waiting to verify this claim.
- You have the right to object to processing your data at any time. We will no longer process your personal data unless we have compelling, legitimate grounds for the processing that override the interests, rights, and freedoms of the data subject or for establishing, exercising, or defending legal claims. You also have the right to object to our processing of your personal data for direct marketing, including profiling.
- You have the right to data portability during certain circumstances. If our processing is based on consent or the fulfillment of an agreement with you, you have the right to have your data transferred to another data controller. This requires that the transfer is technically possible and may be carried out automatically.

5.2. In case your personal data is not being processed in accordance with this Privacy Notice or with the General Data Protection Regulation (EU) 2016/679, you have the right to file a complaint with in Finnish or any other European Supervisory Authority.

6. Security

6.1. ForteAI takes information security seriously, and we are committed to safely processing your personal data. We take appropriate security measures to handle information in accordance with established security standards and practices to protect it from unauthorized access, modification, spread, and destruction.

6.2. The access to personal data is limited to our employees, who need to handle the information to offer you our service and contact you for marketing. We continuously train our employees regarding data protection and the importance of personal integrity.

7. How we share your information

7.1. We share personal data with other companies and organizations to provide you with our website and services, such as our partners for hosting, support, customer insights, event partners, social media, advertising, and marketing services. Whenever we share data, we take appropriate measures to ensure that our partners comply with our data protection requirements and that they are not allowed to use personal data they receive for any other purpose than agreed.

7.2. We may also disclose personal information we collect to:

- Our business partners, as well as our service providers that perform services on our behalf, such as web-hosting service providers, mailing vendors, our blogs, analytics providers, event hosting services, and information technology providers;
- Competent law enforcement, regulator, government authority, court, or third parties: (i) as may be permitted or required by applicable law or regulation; (ii) to exercise, establish, or defend our legal rights; or (iii) to protect your vital interests or those of any other person;
- A potential buyer (and its agents and advisers) in connection with any proposed purchase, merger, or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice; and
- A person or an organization to whom you have consented to disclose.

7.3. Sometimes, personal data will be transferred to companies outside the EU/EEA. Any such data transfer will be kept to a minimum relevant for the purpose. When your data is transferred to a third country, ForteAI will take appropriate measures to ensure the security level is the same as in the EU/EEA and at an adequate security level. Those safeguards can, for example, be using the EU Commission's Standard Contractual Clauses, binding corporate rules, or other supplementary measures.

7.4. ForteAI strives to follow legal developments in the EU and the US following the European Court of Justice ruling in the Schrems II case. We will take appropriate measures to implement the security measures recommended. When personal data is transferred outside of the EU/EEA, as mentioned above, we rely on Article 46 GDPR and the EU Commission Standard Contractual Clauses.

7.5. In the sections below, you will find information on some of the services we review with extra care. Please read through the sections below, where you will find details about what information we collect, why we collect it, and how it is used.

7.6. The following services involve processing in a country outside of the EU, which may offer lesser protection for your data. However, we have considered how to protect your data and added supplementary safeguards that make us confident that the data is protected on an equivalent level to that of the GDPR in the EU.

7.7. We specifically wish to inform you that we use the analytics tool Google Analytics. Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the browsing on our website. You can opt out of having made your activity available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.

Google Analytics processes and stores data on our behalf in several countries, including the U.S. You can find information about Google Analytics locations and their sub-processors subprocessors here. Here are the standard terms and contractual clauses applicable to Google's services. Google has publicly stated that it has never received access requests to its Google Analytics data from U.S. governments; you can read about that here.

We also wish to inform you that we use the services of HubSpot Company ("Hubspot") to provide customer support, a knowledge base, and an FAQ. ForteAI acts as a data controller. Hubspot helps us gauge customer activity, provide a knowledge base, and release updates on new features. Personal data that may be shared with Hubspot to provide these features are email, name, and corporate IP address. We rely on Article 46 GDPR and the European Standard Contractual Clauses in place and have contractual guarantees from Intercom in addition to our data processing agreement. In addition, we have applied data minimization techniques and a strict retention period. Hence, we are confident that an essentially equivalent level of protection can be ensured. Intercom R&D Unlimited Company, a tool used when you are in contact with support, has some processing and storing of data on our behalf in the USA. We use standard contractual clauses applicable to safeguard the data.

7.8. If you have any questions or concerns, please reach out to your ForteAI representative or email our privacy team at hello@forte.so

8. Retention period

8.1. We keep your personal data until it is no longer needed to fulfill the purpose it is used for. Your personal data is stored with us as long as we require it based on the purpose. We may need to store some data longer for one purpose than we need to store it for another purpose. If so, we will only use it when the storage time has not expired.

8.2. In addition to that, we could be required to keep your data for longer to fulfill legal obligations, but in such cases, we won't use the data for anything else.

8.3. Typically, we store your contact information for sales purposes for three years.

8.4. We use the following criteria to determine the retention period of the personal data we process:

- How long is the personal data needed for the purpose they are collected? It includes improving our website, protecting our system, sending marketing, and managing customer relationships.
- Is the data considered to be sensitive? Sensitive personal data is usually stored for a shorter period.
- Do we approve of storing your personal data for extended retention? In that case, we store your data with your approval.
- If ForteAI is, by agreement or in other ways, obligated to store the data. We will then store your personal data in accordance with regulations, for example, if needed by

the Finnish Laws or if personal data is needed for a legal claim.

9. Exclusions

9.1. Aggregated data

We collect and process aggregated data to monitor and evaluate user trends on the website. The information we collect about your actions on our website is anonymized. Anonymization means that personal data is processed so that it cannot be used to identify a person, e.g., through generalization or aggregation of personal data. The anonymization is irrevocable, and data may, therefore, be stored for a longer time than your personal information.

We use this anonymous information about how our users use our website and services for statistics and service improvement.

9.2. Third-party links

Our website may include links to websites belonging to third-party companies which do not belong to ForteAI. This privacy applies to ForteAI's website and not to personal data you provide to third-party websites you may access when you follow a link from our website. This Privacy Notice only applies to our website. We encourage you to review the privacy notices of third-party websites you may access.

9.3. Children

Our website is not directed to, and our services are not intended for, children under the age of sixteen. ForteAI never knowingly or intentionally collects information about children under thirteen. Please notify us at hello@forte.so and request the erasure of personal data if you believe we may process information about a child.

10. Amendments and changes

10.1. ForteAI reserves the right to make changes to this Privacy Notice. If the terms of the Privacy Notice are changed, the date for the latest update at the end of this Privacy Notice will be changed. If significant changes to the terms of the Privacy Notice are made, you will be notified on ForteAI.com or by email before the changes enter into force and, if mandatory, by law. When the policy is updated, the date for the latest update will be changed. You will find the date for the latest update on the first page of this Privacy Notice.

11. How can you contact us?

If you want to know more about our data processing activities, what we do to keep your data safe, or to exercise one of your above-described rights, feel free to email us at hello@forte.so.