

## **FISHHEART PRIVACY POLICY**

### **1 PURPOSE**

- 1.1 At Fishheart, we maintain a strong commitment to privacy. The importance of trust is recognized when our services are used and thus customer and user privacy is given top priority, underscoring our technology and business decisions.
- 1.2 Fishheart operates in the fish industry, providing four main solutions: (1) hydraulic fishway devices with AI-powered monitoring systems; (2) standalone camera boxes sold separately from the monitoring systems; (3) stream restoration services; and (4) ecological egg boxes for natural fish stock revival. Our devices and services collect biological data about fish, river conditions, and restoration outcomes, but do not collect personal data of individuals.
- 1.3 This privacy policy applies to the collection, use, and disclosure of personal data for provision of the services, marketing, sales, client agreements, and when visiting our website. We go to the best possible extent to protect our customer's and user's data and keep it private and secure. Data we may collect within the scope of our service is with the purpose of providing best results and personalized experience and to improve our operations.

### **2 DESCRIPTION OF THE CATEGORIES OF DATA SUBJECTS AND CATEGORIES OF PERSONAL DATA**

- 2.1 As the data controller, the main group of data subjects is the contact details and other information of our customers, users and other business partners.
- 2.2 We collect personal data through different means. The type of data collected depends on the data subject and varies by assignments. Collecting and processing may include, but is not limited, to the following:
  - (a) basic information, such as name, address, email address, phone number, and payment information;
  - (b) information relating to our relationship, such as customer relationship maintenance, contract management with business partners, invoicing and financial administration;
  - (c) data generated in connection with service provision *e.g.*, login information, and how services are used;
  - (d) data generated in connection with website use *e.g.* IP address, browser type, device information, and information collected through cookies and similar technologies
  - (e) other data, which is based on your consent and defined in detail on a case by case basis.
- 2.3 We may collect and use for any purpose aggregated data, where individual person is not identified from *e.g.*, statistical data collected in connection with the provision of services.
- 2.4 The data listed above is considered personal data and is processed in accordance with this privacy policy. In addition to personal data, we also process service-related data (such as product, sales, and inventory data) that does not relate to identifiable individuals. As such, this non-personal service data is outside the scope of this privacy policy and is handled in accordance with applicable contractual terms.

### **3 SERVICE ENHANCEMENTS**

3.1 We may use the personal data collected from you to enhance our service. This includes, but is not limited to, utilising this information to better understand customer and user behaviour, needs, and preferences, to improve existing functionalities, to develop new features, and to provide a more personalized and effective user experience. Such use of personal data is based on our legitimate interest to understand our customers and users and to innovate and improve our Service.

3.2 Personal data is not used for the training of AI models.

### **4 MARKETING AND ANALYTICS**

4.1 We act as an independent controller for processing necessary data to manage our service.

4.2 We may market and inform you about Fishheart's services. We may combine the data collected about you from publicly available sources, and from our different interactions with you. Further, your personal data may also be used for market research.

4.3 Processing of personal data is based on our legitimate interest to collect and analyse relevant information to better understand our customer and users and develop relevant services.

4.4 Based on your consent we may store and access information, including personal data, on your device in order to create personalized ads profile and deliver relevant content at the website (e.g. information and ads about Fishheart) as well as to measure the effectiveness of the advertising. Respectively, your personal data may also be processed to develop and improve the service.

### **5 PURPOSE AND LEGAL BASIS FOR PROCESSING PERSONAL DATA**

5.1 We process your personal data based on the following legal grounds: performance of a contract (customer relationship), legal obligations, and your consent. The purposes for which we process personal data are:

- (a) Sales, marketing and customer relationship management;
- (b) Providing services to our customers and ensuring the functioning and maintenance of our operations and customer portal;
- (c) Verifying the identity of our customers and users for the purposes of signing into the service;
- (d) Managing, pursuing, and analysing customer relationships, including customer communication, customer account management, payroll processing, invoicing, contract management and processing payments;
- (e) Improving and personalizing our services and to develop new services and providing notifications on new features, changes, and improvements;
- (f) Customer support and solving issues; and

(g) Informing and interacting with you of new services, features, and content we may offer.

5.2 We may process your personal data also for specific purposes if you have consented to such processing.

## **6 USE OF COOKIES**

6.1 When you visit our website, cookies, and other similar technologies are used to automatically collect information about the visits. Collected information is detailed in the cookie banner at our website. It is possible for you to accept or refuse the use of the cookies.

6.2 Retention time for each cookie is 12 months. You can accept or refuse cookies or change your earlier choices through cookie banner at our website. You can always disable cookies or clear your cookie history for all visited websites from your browser settings.

6.3 Accepting cookies will enable you to get the best from our website. If you refuse cookies, some aspects of the website may not work on your device, and you may not be able to access all areas thereof.

## **7 DATA SHARING AND DISCLOSURES OF PERSONAL DATA**

7.1 We may share your personal data with third-party service providers who assist us in providing, maintaining and developing our services. These providers may include, for example, hosting providers, analytics services, and customer support tools.

7.2 We may also share your personal data with trusted sales and marketing partners, including trusted sales and marketing partners operating globally for hydraulic fishway and ecological egg box services, and partners in Scandinavian countries for stream restoration services, for purposes such as sales activities and customer relationship management. Such sharing is limited to information necessary for their specific regional responsibilities and is compliant with applicable data protection laws and, where required, based on your consent. Access to personal data is limited to information necessary for their specific regional responsibilities.

7.3 We may disclose your personal data to public authorities, regulators, or other competent bodies if we are legally obliged to do so, or if such disclosure is necessary to comply with a legal request, enforce our legal rights, respond to claims, or protect the rights, property, or safety of our company, users, or others.

## **8 TRANSFER OF PERSONAL DATA OUTSIDE OF THE EU OR EEA**

8.1 The data we collect is processed by us within the European Union (EU)/European Economic Area (EEA) and in third party data processing facilities within the EU/EEA.

8.2 Some of our sales and marketing partners are located outside the EU/EEA, particularly in the United States, and their processing of your personal data will involve a transfer of data outside of EU/EEA.

8.3 We will take necessary steps to provide appropriate safeguards for international data transfers and to the extent necessary implement supplementary measures for protection of personal data as required by applicable laws. We will implement the standard contractual clauses and implement necessary technical, organisational, or contractual supplementary measures to ensure that personal data has the same protection as in EU/EEA in accordance with the GDPR.

## **9 RETENTION OF PERSONAL DATA**

9.1 We will retain the personal data of our customers only for as long as necessary to provide our services, fulfil contractual obligations, and comply with applicable legal requirements. After that, we will securely dispose of your personal data.

9.2 By default, personal data of customers are retained for five (5) years following the termination of the customer relationship, and personal data of business partners are retained for three (3) years following the termination of that relationship, unless a longer retention period is required by law or justified by ongoing legal obligations.

9.3 For website visitors and users interacting only with our website or marketing communications (e.g., via cookies), personal data is retained for a maximum of twelve (12) months from the date of last activity, unless a longer retention period is legally required or separately agreed upon.

## **10 YOUR RIGHTS**

10.1 You have certain rights regarding your personal data:

10.2 Right to Access: You have the right to access your personal data that we hold.

10.3 Right to Rectify Personal Data: You have the right to request that we correct any inaccurate or incomplete personal data that we hold.

10.4 The Right to Object to the Processing: You have the right to object to the processing of your personal data for certain purposes.

10.5 The Right to Data Portability: You have the right to receive your personal data in a structured, commonly used, and machine-readable format.

10.6 The Right to Be Forgotten: You have the right to request that we erase your personal data under certain circumstances.

10.7 The Right to Restriction of the Processing: You have the right to request that we restrict the processing of your personal data under certain circumstances.

10.8 The Right to Give and Withdraw Your Consent: You have the right to give or withdraw your consent for the processing of your personal data.

## **11 DATA SECURITY**

11.1 We take appropriate technical and organizational measures to protect your personal data from loss, destruction, unauthorized access, disclosure, or other misuse. These measures include physical, electronic, and procedural safeguards that comply with applicable legal requirements. We limit access to personal data to those authorized employees and service providers who need to know the information in the course of their duties. They will only process your personal data based on our instructions and are subject to a confidentiality obligation.

11.2 Personal data is stored in an encrypted database on the servers of third-party cloud service providers. We make sure to adhere to best practices for persisting and encrypting data.

11.3 Although our good faith efforts to store your data in a secure operating environment that is not available to the public, please remember that unfortunately no data transmission or storage is 100% risk free. You provide your personal data at your own risk, and we cannot guarantee the absolute security of your data. In the unfortunate case of a security breach that endangers your privacy or data we will inform you as well as the relevant authorities, as required by law. We may also temporarily shut down services to protect the personal data.

## **12 CHANGES TO THE PRIVACY POLICY**

12.1 We may update this privacy policy from time to time. We will notify our customers and users of any significant changes by posting a notice on our website. This privacy policy was last updated on 28.11.2025.

## **13 CONTACT US**

13.1 If you have any questions or concerns about this privacy policy or our use of your personal data, please contact Samuli Ukkola at [samuli@fishheart.com](mailto:samuli@fishheart.com) (+358 405 880 394).

13.2 The contact details of the company are:

Fishheart Oy Ltd. (Business ID: 2746831-6)  
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