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Sharetribe's Privacy Policy & Cookies

Last updated: March, 1st 2018.

This Privacy Policy applies to the processing of personal data concerning the users ("**Users**") of services provided by Sharetribe ("**Service(s)**"). This policy explains what personal data we collect and how we use it. The Users can be Sharetribe's customers ("**Customer**"), who operate their own marketplace, representatives of Customer or Customer's customers ("**End-Users**"). The marketplace operated by the Customer is subject to its own privacy policy. Sharetribe does not take any responsibility of its Customers' or other third parties' privacy policies or processing of personal data in its Customers' or third parties' operations.

Data controller

The data controller in accordance with the applicable data protection law is Sharetribe Oy ("**Sharetribe**", "**we**", "**us**", "**our**"). Sharetribe is responsible for ensuring that the processing of personal data complies with this Privacy Policy and the applicable data protection laws.

Contact details of the data controller:

- Sharetribe Oy
- Business ID (Finland): 2432359-2
- Address: Erottajankatu 19 B, 00130 Helsinki, FINLAND
- Internet: www.sharetribe.com
- Email: info@sharetribe.com

Contact person in privacy matters:

- Antti Virolainen
- Address: Erottajankatu 19 B, 00130 Helsinki
- Phone: +358 50 5311793
- Email: antti@sharetribe.com

Collection of Personal Data

We collect Users' personal data through different means, which are explained below:

Most of the personal data we process is collected directly from the Users. Sharetribe may collect following personal data in the process of providing the Service:

- Basic information such as name, age, postal address, email address and phone number
- Details about User's employer (name, address, phone number, ID and VAT ID) should such information be considered to be personal data
- Authentication information such as sharetribe.com username and password, and if any third party service (e.g. Facebook) is used to sign in, the user ID of that service
- Information relating to the customer relationship such as bought services, their start and end times and information on their use
- Billing information

Following data is processed by Sharetribe's payments processor (currently **Paypal** and **Stripe**, subject to change):

- Payment data, such as credit card number and expiration date

Sharetribe automatically collects and processes the following technical data about the User:

- IP address
- Geographical location data based on the IP address
- Service access times
- Statistics on page views
- Any other automatically collected technical data

Furthermore, Sharetribe may also collect other anonymized statistics about the way the User uses the Services provided by Sharetribe.

Legal basis and purpose of processing personal data

Sharetribe processes personal data for three main purposes:

(1) Service

The primary purpose of collecting personal data is to provide the website sharetribe.com and Services, to issue accurate charges for the use of the Services and to manage the customer relationship. The processing of personal data in this case is based on the agreement between the Customer and Sharetribe. This concerns, for example, the data collected during the signing up for the Service, during the use of the Service and the technical data needed to run the Service in a secure manner and communications with Users.

(2) Marketing and other communications

Sharetribe may occasionally send its Customers (and End-Users when the relevant personal data has been collected by Sharetribe itself) email to inform about new features, solicit feedback, or provide information on what is going on with Sharetribe and its products, as well as the various marketplaces built using the sharetribe.com service. We base this on our legitimate interest to provide Users with relevant information as part of the Services and to promote our Services.

(3) Service development and research

We always work to make our Services better. Therefore, we may use the User's data to improve the Services. We base this processing on our legitimate interest to grow and develop. Sharetribe may also collect technical data for statistical purposes to compile anonymous, aggregated statistics, such as about the most popular marketplaces. Sharetribe may display information publicly to others in an aggregate format that does not reveal statistics of any single marketplace. Sharetribe does not disclose personal data other than as described below.

Disclosures of Personal Data

We may disclose personal data to third parties in the following cases:

- Sharetribe may use subcontractors when providing its Services. Our trusted subcontractors work on our behalf, and do not have an independent right to use the personal data we disclose to them. Sharetribe discloses personal data to its subcontractors on a need to know basis when necessary to process such data on Sharetribe's behalf in order to provide Services. Subcontractors are subject to appropriate security and confidentiality requirements.
- When required by law such as to comply with requests by competent authorities or in response to a subpoena, court order or other governmental request;
- When we believe in good faith that disclosure is necessary to protect our rights, investigate fraud or to protect our Users' safety or rights.
- If Sharetribe, or substantially all of its assets, are acquired, or in the unlikely event that Sharetribe goes out of business or enters bankruptcy, User information would be one of the assets that is transferred or acquired by a third party. You acknowledge that such transfers may occur, and that any acquirer of Sharetribe may continue to use your personal data as set forth in this Privacy Policy.

Transfer of personal data outside of EU/EEA

When necessary and to the extent required for the successful provision of the Services, personal data may be transferred to third parties outside of EU/EEA. Sharetribe or its subcontractors shall not transfer personal data outside of EU/EEA without adequate safeguards required by applicable data protection law, such as standard contractual clauses. Sharetribe may also use Privacy Shield-certified subcontractors located in the U.S. For more information about the Privacy Shield framework developed by the U.S. Department of Commerce and the EU Commission and the related principles concerning processing of personal data, please see [here](#).

Cookies

Cookies are pieces of data which are received and transmitted by a User's device when the User is using Sharetribe's Services or website. Sharetribe may use cookies and similar techniques to provide functionality of the Services, to enhance the user experience and to identify Users and how they use the Services. We use cookies, for example, to login and logout authentication, to remember session allowing Users to continue the session in case of time-out and to prevent unauthorized use of the Services. The User may prohibit the use of cookies or remove cookies from the browser settings. However, cookies are important part of how the Service works, so limiting the use of cookies may affect the functionality of the Service.

Sharetribe uses third party cookies for various purposes. We may use third party cookies for statistical purposes to compile anonymous, aggregated statistics, such as to estimate number of Users and detect which parts of the Service Users find most useful, and identify features that could be improved. For such purposes, we use third party cookies, such as Google Analytics, to help analyze how our Users use the Service. The technical usage information (including IP address) generated by the cookie about use of the Service is transmitted to such third parties to compile statistical reports.

Sharetribe may also use third party cookies for marketing purposes to collect information about Users' browsing habits and to remember visits in order to make advertising more relevant to that User and to his or her interests. These cookies are usually placed by third party advertising networks and social media providers, such as Doubleclick, Google Adwords and Twitter. A list of used third parties is available [here](#).

Retention of personal data

The User's personal data will be retained only for as long as necessary to fulfil the purposes defined in this Privacy Policy. When the User's personal data is no longer required by law or rights or obligations by us or the User, we will delete the personal data. In most cases, personal data will be deleted upon termination or expiry of the agreement between the Customer and Sharetribe or upon the Customer's written request. Please note that Sharetribe may have a right to retain some data even after termination of the agreement for billing purposes.

Exceptionally, Sharetribe may retain personal data for a longer period if we have a legitimate reason or an obligation to store data for the purposes of criminal investigation or other corresponding reason.

Users' rights

A User has the right to access the data on him/her and upon request, obtain a copy of the data. Such request shall include information that is necessary for retrieving the data and shall be made using a personally signed document which can be addressed to the contact person provided in this Privacy Policy. Sharetribe rectifies, erases or supplements possibly erroneous, unnecessary,

incomplete or obsolete personal data at its own initiative or at the request of User concerned. The User is advised to contact Sharetribe's contact person provided in this Privacy Policy to correct any possibly erroneous data.

Users have the right to prohibit Sharetribe to process personal data for purposes of direct marketing. Sharetribe advises the Users to notify Sharetribe's contact person provided in this Privacy Policy of such possible prohibitions in writing. Users also have a right to data portability to the extent granted by applicable data protection rules. Data portability refers to a right to receive own personal data in a structured, commonly used machine-readable format and transmit your personal data to another data controller.

If a User thinks there is a problem with the way Sharetribe is processing personal data, the User has a right to file in a complaint to a data protection authority in the EU. In Finland the competent authority is the Data Protection Ombudsman. The User may contact Finnish Data Protection Ombudsman through [this link](#).

Privacy Policy Changes

Sharetribe may change this Privacy Policy from time to time. Sharetribe recommends that the Users regularly access the Privacy Policy to obtain knowledge of any possible changes to it. We will provide the date of the Privacy Policy to allow Users to see changes. Sharetribe will inform Users of possible changes by using reasonable and available channels.

Let's build a marketplace!

- ✓ Launch quickly
- ✓ Expand on-demand
- ✓ Support every day

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