

# Data Protection Policy

v. 20250514

The protection of your personal information is very important to us.

You will find details below about the collection of personal data when using the visualcomponents.com website. Personal data are all data that may relate to you personally, e.g. name, address, e-mail addresses, user behavior.

The “controller” as defined in Art. 4(7) of the EU General Data Protection Regulation (GDPR) is:

Visual Components  
Hatsinanpuisto 8  
02600 Espoo, Finland

## Executive Board

Mikko Urho  
Chief Executive Officer

Phone: +358 9 252 40 800

Further information can be found in our [Imprint](#).

Our Data Protection Officer can be reached at [data-privacy@visualcomponents.com](mailto:data-privacy@visualcomponents.com).

## Security

The Visual Components systems and websites are protected by technical and organizational security measures in order to prevent the loss, manipulation or destruction of your personal data and to avoid access to these data by unauthorized persons. Despite using industry standard Secure Sockets Layer (SSL) technology for encrypting the data transferred between you and our website, complete protection against all eventualities is not possible.

## **Disclosure of personal data**

No personal data will be disclosed to third parties without your express permission. Data shall only be passed on to public bodies, law enforcement authorities and courts where there is a legal requirement to do so. Our employees are also obliged to secrecy and to treat the personal data you provide confidentially.

The third-party designation shall not apply to companies affiliated with Visual Components Oy, nor shall it apply to service providers contractually bound to us for contracted data processing.

## **Collection, processing and use of personal data**

### **Use of Website**

If you are using our website for purely informative purposes, i.e. if you are not registered or sending information to us in any other way, we collect only those personal data that your browser sends to our server. We require these data for technical purposes in order to display our website for you and to ensure the stability and security thereof. These data also enable us to purposefully improve our range of services. The legal basis for this is contained in Art. 6, para. 1, sentence 1(f) GDPR (legitimate interest).

This includes:

- Date and URL relating to the visitor's use of the website
- URL immediately prior to the visitor's access to the website
- IP address and domain from which the site was accessed
- The browser used
- The operating system used
- Technical information about the visit (http method, http version, http status code, length of the data transferred)

### **Product key order**

When processing Product key orders and product registration, we collect the following personal information such as:

- Company
- Invoicing information of the company
- Order number
- Name
- E-mail address

- Workstation identifiers:
  - o Device Name
  - o System Model
  - o Operating System's Serial Number

To read out this information, we may provide you with a tool that only summarizes this data in a file, which you then send to us.

Which data is mandatory to indicate is specially marked in each case. Further information is voluntary.

The indication of your personal data serves the purpose of the conclusion of the contract and the completion of your order. The legal basis is Art. 6 Para. 1 S. 1 lit. b (GDPR).

### **Use of cookies**

Visual Components uses cookies in order to make its website more attractive and user friendly. The legal basis for this is contained in Art. 6, para. 1, sentence 1(f) GDPR. Cookies are small text files which are stored on your device but do not contain a virus of any kind or cause any damage. Our website uses "session cookies". These cookies track your movements between the various pages of our website during a session so that you are not asked for the same information that you have already provided on our website. Closing and reopening the browser starts a new user session with a new cookie ID. "Global cookies" are also used. These measure the traffic of the website and identify the visitors and the session. These cookies are not deleted at the end of the session, but are replaced after a year.

You can determine how the "Global cookies" are set by selecting from among three levels under "Cookie settings" (can be called up on via the cookie banner during the initial visit to the site). There, you can also obtain a complete overview of all the cookies embedded into our site.

### **Performance cookies**

These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies we will not know when you have visited our site, and will not be able to monitor its performance.

## **Functional cookies**

These cookies enable the website to provide enhanced functionality and personalisation. They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies then some or all of these services may not function properly.

## **Targeting cookies**

To get the full functionality of Visual Components Academy website, the targeting cookies that include VISITOR\_INFO1\_LIVE, CONSENT, YSC which enable external embedded contents such as YouTube videos needs to be accepted.

You can prevent the saving of cookies using the appropriate browser settings. However, if you want to be able to use all the functions of our website, we do not recommend this.

## **Visual Components' involvement in social media**

Besides our website, Visual Components is present on various social media. We are currently represented on YouTube, LinkedIn, Facebook, X (former Twitter), and Instagram. Please refer to the data privacy provisions of the relevant operator for the purpose and extent of the related data collection as well as the provisions for use of your data by the relevant platform.

YouTube (Google): <https://policies.google.com/privacy>

LinkedIn: [https://www.linkedin.com/legal/privacy-policy?trk=organization-guest\\_footerprivacy-policy](https://www.linkedin.com/legal/privacy-policy?trk=organization-guest_footerprivacy-policy)

Facebook: <https://www.facebook.com/privacy/explanation>

X (former twitter): <https://twitter.com/de/privacy>

Instagram: <https://help.instagram.com/155833707900388>

## **Embedded content**

YouTube

This website uses plug-ins to display and play videos from the following provider: Google Ireland Limited, Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland  
Data can also be transmitted to: Google LLC., USA

If you call up a page of our website that contains such a plug-in, your browser establishes a direct connection to the servers of the provider in order to load the plug-in. Certain information, including your IP address, is transmitted to the provider.

If the embedded videos are played via the plug-in, the provider also uses cookies to collect information about user behavior, compile playback statistics and prevent abusive behavior.

If you are logged into a user account from the provider during your page visit, your data will be directly assigned to your account when you click on a video. If you do not want data to be allocated to your account, you must log out before pushing the play button.

All of the aforementioned processing, in particular the setting of cookies for reading information on the end device used, will only be carried out if you have given us your express consent to do so in accordance with Art. 6(1)(a) GDPR by activating marketing cookies via the “cookie consent tool” provided on the website. You can withdraw your consent at any time with effect for the future by disabling targeting cookies via the “cookie consent tool” provided on the website.

For the transfer of data to the United States, the provider has signed up to the EU-US Data Privacy Framework, which ensures compliance with the European level of data protection on the basis of an adequacy decision by the European Commission.

## **Facebook**

Plug-ins for the social network of the following provider are used on our website: Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland  
These plug-ins enable direct interactions with content on the social network.

In order to increase the protection of your data when visiting our website, the plug-ins are initially disabled and are only integrated into the site if targeting cookies are selected. Only upon enabling the targeting cookies and thus providing your consent to the transmission of data in accordance with Art. 6(1)(a) GDPR does your browser establish a direct connection to the provider’s servers. Independent of a login to an existing user profile, information about your end device used (including your IP address), your browser and your page history is transmitted to the provider to a certain extent and further processed there if necessary.

If you are logged into an existing user profile on the provider’s social network, information regarding interactions completed via the plug-ins will also be published there and your contacts will be displayed.

You can withdraw your consent at any time with effect for the future by disabling targeting cookies via the “cookie consent tool” provided on the website.

Data can also be transferred to: Meta Platforms Inc., USA

We have entered into an order processing agreement with the provider, which ensures the protection of the data of our website visitors and prohibits unauthorized disclosure to third parties.

For the transfer of data to the United States, the provider has signed up to the EU-US Data Privacy Framework, which ensures compliance with the European level of data protection on the basis of an adequacy decision by the European Commission.

### **Internet advertising**

We advertise on both our own website and non-affiliated websites. We do so using the information made available to us when you visit our website and make use of our content or services. This information is collected by means of cookies. After visiting the Visual Components website, you may therefore see advertisements for Visual Components on other websites in the form of banners.

The display of advertisements as a result of your activities on non-affiliated websites is not associated with your identity. We do not share any personal data with advertisers or other third parties that display our advertisements. Advertisers or other third parties (including advertising networks, ad serving companies and any other service providers contracted by such) may nevertheless assume that users who click on or interact with advertisements or content belong to the target group for the advertisements or content in question.

We currently use the following tools for Internet advertising. They function by using either cookies or pixels. The legal basis for this is contained in Art. 6, para. 1, sentence 1(f) GDPR. For more detailed information on how the various tools work, please refer to the websites of the individual third-party providers:

Google Tag Manager

Facebook Pixel

Microsoft UET-Tag

LinkedIn Insight Tag

### **Microsoft Advertising**

This website uses retargeting technology of the following provider: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA

This enables us to target visitors to our website who have already shown an interest in our store and our products with personalized, interest-based advertising. The advertising material is displayed on the basis of a cookie-based analysis of previous and current user behavior, but no personal data are stored. In the case of retargeting technology, a cookie is stored on your computer or mobile device in order to collect pseudonymous data about your interests and thus adapt the advertising individually based on the stored information. These cookies are small text files that are stored on your computer or mobile device. This means that you are shown advertising that is highly likely to match your product and information interests.

All forms of processing described above, in particular the setting of cookies for reading information on the end device used, will only be carried out if you have given us your express consent to do so in accordance with Art. 6(1)(a) GDPR. If you do not give your consent, retargeting technology will not be used during your visit to our website. You can revoke your consent at any time with effect for the future. To revoke your consent, please disable this service in the “cookie consent tool” provided on the website.

In the case of data transmission to the USA, the provider has signed up to the EU-US Data Privacy Framework, which ensures compliance with the European level of data protection on the basis of an adequacy decision by the European Commission.

### **Google Ads Conversion Tracking**

This website uses the online advertising program “Google Ads” and, as part of Google Ads, the conversion tracking service of Google Ireland Limited, Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland (“Google”). We use the advertising services provided by Google Ads (known as Google Adwords) to make people aware of our appealing services on external websites. By analyzing the data pertaining to the advertising campaigns, we are able to establish how successful the individual advertising measures are. In doing so, we are pursuing the aim of presenting you with advertising that is of interest to you, that makes our website more interesting for you and that provides us with good value for money.

The cookie for conversion tracking is set when a user clicks on an “Ads” advertisement placed by Google. Cookies are small text files that are stored locally on your device. These cookies generally lose their validity after 30 days and are not used to identify the user personally. If the user visits certain pages of this website and the cookie has not yet expired, both we and Google will be able to recognize that the user clicked on the ad and was redirected to this page. Each Google Ads customer receives a different cookie. As such, cookies cannot be tracked via the websites of Google Ads customers. The information gathered with the aid of the conversion cookie is used to generate conversion statistics for Google Ads customers who have opted to use conversion tracking. The customers are

informed about the total number of users who have clicked on their ad and were then redirected to a page featuring a conversion tracking tag. However, they do not receive any information that could be used to identify users personally. When Google Ads is used, personal data may also be transmitted to the servers of Google LLC. in the USA.

Details on the processing operations initiated by Google Ads Conversion Tracking and how Google handles data from websites can be found here:

<https://policies.google.com/technologies/partner-sites>

All forms of processing described above, in particular the setting of cookies for reading information on the end device used, will only be carried out if you have given us your express consent to do so in accordance with Art. 6(1)(a) GDPR. You can withdraw your consent at any time with effect for the future by disabling this service via the “cookie consent tool” provided on the website.

You can also permanently object to cookies being set by Google Ads Conversion Tracking by downloading and installing the Google browser plug-in available at the following link:

<https://www.google.com/settings/ads/plugin?hl=de>

Please note that if you have disabled the use of cookies, you may not be able to use certain functions of this website or may only be able to use them to a limited extent.

Google's privacy policy can be viewed here:

<https://business.safety.google/intl/de/privacy/> and

<https://www.google.de/policies/privacy/>

For data transfers to the USA, the provider has signed up to the EU-US Data Privacy Framework, which ensures compliance with the European level of data protection on the basis of an adequacy decision by the European Commission.

### **Microsoft Advertising Universal Event Tracking**

This website uses conversion tracking technology of the following provider: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA

To use universal event tracking, a tag is stored on every page of our website and interacts with the conversion cookie set by Microsoft. This interaction makes it possible to track user behavior on our website and sends the information collected in this way to Microsoft. The purpose of this is to statistically track and evaluate certain predefined goals, such as purchases or leads, so that we can tailor the focus and content of our offers more closely to



your interests. The tags are not used to identify users personally at any time.

All forms of processing described above, in particular the setting of cookies for reading information on the end device used, will only be carried out if you have given us your express consent to do so in accordance with Art. 6(1)(a) GDPR. If you do not give your consent, retargeting technology will not be used during your visit to our website.

You can revoke your consent at any time with effect for the future. To revoke your consent, please disable this service in the “cookie consent tool” provided on the website.

In the case of data transmission to the USA, the provider has signed up to the EU-US Data Privacy Framework, which ensures compliance with the European level of data protection on the basis of an adequacy decision by the European Commission.

## **HubSpot**

This website uses the software-based marketing service of the following provider for the provision and synchronization of various customer management services: HubSpot Ireland Ltd, 2nd Floor 30 North Wall Quay, Dublin 1, Ireland.

The service enables the automated processing of feed activities, the control of advertising in marketing channels used and the success analysis of marketing measures as well as centralized e-mail marketing and contact management.

Cookies are used to perform the various functions, i.e. small text files that are stored locally in the cache of your web browser on your end device and enable us to analyze your use of the website. The cookies collect certain information, such as the IP address, the location and the time the page was accessed.

All processing described above, in particular the setting of cookies for reading information on the terminal device used, will only be carried out if you have given us your express consent to do so in accordance with Art. 6 para. 1 lit. a GDPR. You can revoke your consent Data Protection Policy (v. 20231228) 6 | 10 at any time with effect for the future by deactivating this service in the "cookie consent tool" provided on the website.

Other legal bases for data processing that are used in the context of specific service functions (such as the need for express consent in accordance with Art. 6 para. 1 lit. a GDPR when sending newsletters) remain unaffected by this.

We have concluded an order processing contract with the provider, which ensures the protection of the data of our website visitors and prohibits unauthorized disclosure to third

parties.

## **Website analysis**

### **Google Analytics 4**

This website uses Google Analytics 4, a web analytics service provided by Google Ireland Limited, Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland ("Google"), which enables your use of our website to be analyzed.

By default, Google Analytics sets 4 cookies when you visit the website, which are stored as small text modules on your end device and collect certain information. The scope of this information also includes your IP address, which, however, is shortened by Google by the last digits in order to exclude a direct personal reference.

The information is transferred to Google servers and processed there. Transmission to Google LLC, based in the USA, is also possible.

Google uses the information collected on our behalf to evaluate your use of the website, to compile reports on website activity for us and to provide us with other services relating to website activity and internet usage. The abbreviated IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data. The data collected as part of the use of Google Analytics 4 is stored for a period of two months and then deleted.

All processing described above, in particular the setting of cookies on the terminal device used, will only take place if you have given us your express consent to do so in accordance with Art. 6 para. 1 lit. a GDPR.

Without your consent, Google Analytics 4 will not be used during your visit to our website. You can withdraw your consent at any time with effect for the future. To exercise your right of withdrawal, please deactivate this service using the "cookie consent tool" provided on the website.

We have concluded a data processing agreement with Google that ensures the protection of the data of our website visitors and prohibits unauthorized disclosure to third parties.

Further legal information on Google Analytics 4 can be found at <https://policies.google.com/privacy> and at <https://policies.google.com/technologies/partner-sites>

### *Demographic characteristics*

Google Analytics 4 uses the special function "demographic characteristics" and can use it to create statistics that make statements about the age, gender and interests of site visitors. This is done by analyzing advertising and information from third-party providers. This allows target groups to be identified for marketing activities. However, the data collected cannot be assigned to a specific person and is deleted after being stored for a period of two months.

### *Google Signals*

As an extension to Google Analytics 4, Google Signals can be used on this website to generate cross-device reports. If you have activated personalized ads and linked your devices to your Google account, Google may, subject to your consent to the use of Google Analytics in accordance with Art. 6 para. 1 lit. a GDPR, analyze your usage behavior across devices and create database models, including cross-device conversions. We do not receive any personal data from Google, only statistics. If you wish to stop the cross-device analysis, you can deactivate the "Personalized advertising" function in the settings of your Google account.

To do this, follow the instructions on this page:

<https://support.google.com/ads/answer/2662922?hl=de>

You can find more information about Google Signals at the following link:

<https://support.google.com/analytics/answer/7532985?hl=de>

### *UserIDs*

As an extension to Google Analytics 4, the "UserIDs" function can be used on this website. If you have consented to the use of Google Analytics 4 in accordance with Art. 6 para. 1 lit. a GDPR, have set up an account on this website and log in with this account on different devices, your activities, including conversions, can be analyzed across devices.

For data transfers to the USA, the provider has joined the EU-US Data Privacy Framework, which ensures compliance with the European level of data protection on the basis of an adequacy decision by the European Commission.

### **Enhanced Conversion Measurement**

To improve the accuracy of our conversion tracking and better understand the effectiveness of our marketing campaigns, we utilize "Enhanced Conversions for Web" with Google Analytics 4 (GA4).

### *How it Works:*

When you complete a conversion on our website (e.g., making a purchase, submitting a form, or signing up for a newsletter), we may collect certain first-party customer data that you provide, such as your email address or phone number.

This data is immediately converted into a secure, unreadable, one-way hashed code using a cryptographic algorithm (SHA256) before being sent to Google. Google then uses this hashed data to match against its own hashed data from consented, signed-in Google users. This allows us to attribute conversions to your interactions with our advertisements in a privacy-preserving manner, without directly sharing your identifiable personal information with Google.

#### *Why We Use It:*

**Improved Conversion Accuracy:** This helps us get a more complete and accurate picture of how our advertising campaigns are driving conversions, especially as browser technologies and privacy regulations evolve.

**Better Campaign Optimization:** With more accurate conversion data, we can optimize our advertising campaigns more effectively, leading to more relevant ads for our users and a better overall experience.

**Understanding User Journeys:** Enhanced conversions can help us understand cross-device user journeys, showing how users might interact with our ads on one device and complete a conversion on another.

#### **Data Shared with Google:**

We share only the securely hashed versions of the customer data you provide at the time of conversion. This hashed data cannot be reverse-engineered to reveal your original personal information by third parties, including us or Google, once it's been hashed. Google uses this data in accordance with its own privacy policies. For more information on how Google uses data from its partners, please visit [Google's Privacy & Terms page for partners](#).

#### *Your Choices:*

Your privacy is important to us. Our use of Enhanced Conversions for Web is subject to your cookie and data collection preferences as indicated through our cookie consent banner or privacy settings. If you have opted out of advertising cookies or analytics, or if your consent management preferences restrict the sharing of such data, we will respect those choices, and Enhanced Conversions will operate in a limited or disabled capacity based on your consent.

You can withdraw your consent at any time with effect for the future by disabling targeting cookies via the “cookie consent tool” provided on the website.

#### **Mouseflow**

This website uses Mouseflow, a web analytics tool from Mouseflow ApS, Flaesketorvet 68, 1711 Copenhagen, Denmark, to record randomly selected individual visits (with pseudonymized IP address only). A log of mouse movements and clicks is thus created with the intention of playing back individual website visits on a random basis and deriving potential improvements for the website from this. The processed information will not be passed on to third parties.

All forms of processing described above, in particular the setting of cookies for reading information on the end device used, will only be carried out if you have given us your express consent to do so in accordance with Art. 6(1)(a) GDPR. You can withdraw your consent at any time with effect for the future by disabling this service via the “Cookie settings”. Furthermore, you can globally opt out of recording on all websites that use Mouseflow for the browser you are currently using at the following link:

<https://mouseflow.de/opt-out/>

### **Leadoo**

We use Leadoo’s tracking service to follow what users are doing on the site and combine this behavioral data with other data we can gather from e.g. chat interactions. Leadoo uses etag tracking in order to hook together the same users behavior over several sessions – in practice this works similarly to cookie based tracking.

Please check out Leadoo Marketing Technologies Ltd’s Privacy Policy (<https://leadoo.com/privacy-policy/>) for more information

on what is tracked and what your rights are. Leadoo works as the Processor and we work as the Controller for the data in terms of GDPR. All forms of processing described above will only be carried out if you have given us your express consent to do so in accordance with Art. 6(1)(a) GDPR. You can withdraw your consent at any time with effect for the future by disabling this service via the “Cookie settings”. You can also stop the tracking by emptying your browser’s cache after the visit. For more on how Leadoo works as a GDPR compliant processor, see <https://leadoo.com/privacy-policy-processor/>

### **Subscribing to our email newsletter**

Your e-mail address will be used to send our quarterly newsletter and other relevant news, such as product launches and offers. You give us your express consent to send the newsletter, news, product launches and offers, and the processing of your personal data.

We use what is known as the double opt-in procedure for sending newsletters and other subscribed emails, which ensures that you only receive newsletters and subscribed emails if you have expressly confirmed your consent to receive the newsletter by clicking on a verification link sent to the email address provided.

By activating the confirmation link, you give us consent to use your personal data in accordance with Art. 6(1)(a) GDPR. We store your IP address as entered by your internet service provider (ISP) as well as the date and time of subscription in order to be able to trace any possible misuse of your email address at a later date. The data we collect when you subscribe to the newsletter is used strictly for the intended purpose.

You can withdraw this consent and unsubscribe or change your preferences from the newsletter or other marketing emails at any time here:

<https://www.visualcomponents.com/email-subscription/> .

In the case of distribution of the newsletter, we evaluate your user behavior. For this evaluation, the e-mails that are sent contain so-called web beacons or tracking pixels, i.e. single-pixel image files that are saved on our website. For the purpose of evaluation, we link the data specified under “Collection, processing and use of personal data” and the web beacons with your e-mail address and an individual ID. We use the data thus acquired to create a user profile in order to tailor the newsletter to your specific interests. We receive information about when you read or forward our newsletter, which links you click on in it, and use this information to draw conclusions about your personal interests. We link these data with your actions on our website. We use these functions due to our justified interest in targeted advertising. The legal basis for this is contained in Art. 6 (1)(1)(f) GDPR.

You can withdraw your consent to this tracking at any time by unsubscribing from the newsletter.

Initiating contact

### **E-mail and forms**

Upon filling out a form on our website or contacting us by e-mail, the data you have provided will only be used to process your request and will be treated confidentially at all times. If you contact us using our contact form, you must always specify your first and last name, your e-mail address and the country from which you are writing to us. You give us your express consent for processing these personal data for the purpose of handling your request. The legal basis is contained in Art. 6, para. 1, sentence 1(a) GDPR. You can withdraw this consent at any time.

We erase the data used for the purpose of establishing contact once storage is no longer required or restrict processing if there are statutory retention obligations.

#### Links to third-party websites

Our website may contain links to external websites. At the time of setting the link, Visual Components satisfied itself that the linked pages do not contain illegal content of any kind. However, Visual Components cannot ensure continuous monitoring and has no influence whatsoever on the content of the linked websites. No liability will therefore be accepted for the content after the link has been set.

#### Your rights

You have the following rights from us in respect of your personal data:

- Right of access,
- Right to rectification or erasure,
- Right to object to processing,
- Right to restriction of processing,
- Right to data portability.

You can contact our Data Protection Officer free of charge at [data-privacy@visualcomponents.com](mailto:data-privacy@visualcomponents.com) to assert these rights.

You also have the right to lodge a complaint with a data protection authority regarding our processing of your personal data.

#### Time limits for erasure

We erase all personal data as soon as they are no longer required for the purpose that they have been collected for or you have exercised your right to erasure. Provided there are no statutory retention periods and none of the other exemptions specified in Art. 17, para. 3 GDPR applies, we will erase the data concerned as quickly as possible.

#### Contact person

If you have any questions regarding the design or functions of the website, please contact: [data-privacy@visualcomponents.com](mailto:data-privacy@visualcomponents.com)

#### Reservation of the right of modification

The Visual Components Privacy Policy can be saved or printed at any time. Visual Components, however, reserves the right to adapt the Privacy Policy at any time, subject to data protection regulations, in order to cater for the ongoing further development of the website.