

# Privacy Policy

## Nyrkiö Oy



Questions? Please contact:

Henrik Ingo, [henrik@nyrk.io](mailto:henrik@nyrk.io)

Data protection officer

### SUMMARY OF DATA PROCESSING



#### Who's concerned

- You, who use the Nyrkiö service ("**Service**"), visit our website at [nyrkio.com](https://nyrkio.com), or contribute to our Service at GitHub.



#### What do we need your data for

To...

- **Provide our Service** effectively and safely
- **Contact** you and inform you about relevant matters concerning our Service
- **Notify** you about updates to our Service
- **Inform** you about changes in our software
- **Monitor** the proper functioning of our software
- **Analyze** the performance of our website and Service
- **Process payments**



#### Information we collect

- Contact details
- Communications
- Service use analytics
- Website use analytics
- Payment information
- Information about your open source contributions



#### How long do we keep your data

- Service: 1 year from the date of you last using the Service
- Website: 7 years from when a page was visited.



#### Where do we get your data

- We get your information from you when you start using Nyrkiö Services or during the Service
- Website analytics using cookies
- If you contact us regarding the website or the Service
- GitHub (from contributors)



#### Who else gets (some of) your data

The most important Services we use:

- **Payments:** Stripe
- **Infrastructure:** AWS
- **Communications:** Google
- **Analytics:** Posthog
- **Open Source:** GitHub



#### Your rights

You may request:

- A copy of your data
- The deletion of your data
- That we correct any incorrect data
- The restriction of processing
- That we cease some processing of your data (right to object)

## About Nyrkiö Oy

Nyrkiö Oy is a company focused on enhancing performance testing in Continuous Integration workflows. It employs advanced change point detection algorithms to identify performance regressions and improvements with minimal manual effort. Nyrkiö Oy develops specialized software that enhances performance testing in Continuous Integration workflows. Utilizing advanced change point detection algorithms, their software identifies performance regressions and improvements with minimal manual effort.

## Why we process personal data

In order to efficiently provide our Services, we need some information about you. This information is called 'personal data', and in order to run our Service and provide our website, we need to collect at least some data from you, some of which is personal data. It is data directly linked to you or data that makes you identifiable from combined with other collected data. Because we collect, use, and store your personal data, we are a so-called controller of your information. In this privacy statement, we express how we process your data openly and transparently.

### Controller

Nyrkiö Oy

### Our contact person for data protection

Henrik Ingo, [henrik@nyrk.io](mailto:henrik@nyrk.io)  
Data protection officer

# Personal data in the register

In the register the following information or personal data is collected:

Data subjects	Personal data	Basis of processing	Purpose of processing	Duration of processing
<b>Users of the Service</b>	Name	Performance of contract	Identification	1 year after you stop using the Service
	Title	Performance of contract	Identification	-II-
	Organisation	Performance of contract	Identification	-II-
	Phone number	Performance of contract	Identification	-II-
	Email address	Performance of contract	Identification	-II-
	Payment information	Performance of contract	Identification	-II-
	Contact information	Performance of contract	Identification	-II-
	Name/User ID	Performance of contract	Identification	-II-
	Login information (username / password)	Performance of contract	Identification	-II-
	Use analytics	Consent	Optimization of the service and marketing	[Add, how long do you need to retain use analytics?]
Data subjects	Personal data	Basis of processing	Purpose of processing	Duration of processing
<b>Website users</b>	Browser in use	Legitimate interest	Optimisation of the Service	7 years
	Device information	Legitimate interest		
	IP-address	Legitimate interest	Optimisation of the Service	7 years
	Analytics	Consent	Optimisation of the Service and marketing	7 years

Data subjects	Personal data	Basis of processing	Purpose of processing	Duration of processing
<b>Communications from potential clients</b>	Name		Identification	7 years
	Title		Identification	7 years
	Organisation		Identification	7 years
	Phone number		Identification	7 years
	Email address		Identification	7 years
Data subjects	Personal data	Basis of processing	Purpose of processing	Duration of processing
<b>GitHub contributors</b>	Contribution information (e.g. name, contact details)	Required by Copyright legislation	Performance of the Service	

## Data collection for marketing

We use the information received from you for marketing. This means you might see Nyrkiö Oy advertisements while browsing Facebook or other websites after visiting our Service. For the targeting of this content, we also use cookies ([learn more about cookies](#))

We do not disclose your phone number, email address, or other information to other parties so that they could use it for their direct marketing towards you.

## Regular sources of information

We receive information about you from you. Information is given to us by yourself or data that we have collected through observation. We do not collect information about you from other parties or other sources.

We collect data and process data when you:

- Enter into our website
- Have accepted the use of cookies and use the website
- Communicate to us (for example, via email)
- Start using our Service
- Use our Service
- Pay for the use of our Service
- Contribute to the Service on GitHub

## Your rights

You have the following rights, the requests for the exercise of which must be made to Henrik Ingo at [henrik@nyrk.io](mailto:henrik@nyrk.io).

Right	User information
Right to access	You have the right to access and correct your personal data retained in our register.
Deletion of personal data / "Right to be forgotten"	<p>If you feel that the processing of some of your personal data is not necessary for our processing purposes, you have the right to ask us to delete that data.</p> <p>However, if you wish to delete any other information, we will process your request as soon as possible, after which we will either delete your information or provide you with a valid reason why the information cannot be deleted. If you disagree, you have the right to lodge a complaint with the Data Protection Ombudsman(<a href="#">instructions for making a complaint</a>).</p>
Objection to processing	You have the right to object to the processing of your personal data at any time if you feel that we have processed your personal data unlawfully or that we do not have the lawful basis to process your personal data. We will process your request as soon as possible.
Complaint	You have the right to file a complaint with the Data Protection Ombudsman if you feel that we are in breach of applicable data protection laws when processing your personal data ( <a href="#">instructions for making a complaint</a> ).
Right to restrict processing	You have the right to request a restriction on the processing of your personal data under certain conditions. If you believe that the processing of your personal data is incorrect, unnecessary, or lacks a lawful basis, you may ask us to limit the processing to storage only or to perform processing under specific circumstances, such as with your consent or for the establishment, exercise, or defense of legal claims. We commit to reviewing your request promptly and will inform you as soon as possible of the action taken.

## Disclosure of information

We do not disclose your data to any third parties.

These parties process your personal data (for example, record and store) on our behalf:

**Payments:** Stripe

**Infrastructure:** AWS

**Communications:** Google

**Analytics:** Posthog

**Open Source:** GitHub

These Service providers do not have the right to view your information unless necessary to ensure the Service's functionality.

In addition, we use subcontractors to develop our Service. These subcontractors do not process your information, but they do have access to our databases. These subcontractors or their employees may therefore see the information we collect about you. All our subcontractors and their personnel are bound by strict professional secrecy and confidentiality.

## **Data transfer outside the EU**

We have chosen secure data centers located in the EU as the storage location for your data. The information in the register will not be stored outside the European Union or the EEA. No data transfers are made from the Service user register outside the EU or the European Economic Area.

If we are required to disclose personal data under applicable mandatory law, personal data may be transferred outside the European Union and the European Economic Area.

### **Standard Contractual Clauses**

It is possible that we or the Service providers used by us may, in some circumstances, transfer your information outside the EU / EEA. This can happen, for example, if data is duplicated outside the EU / EEA to the United States so that your data is secure even in the event of a failure of the main servers. Transmission must always be carried out safely and in accordance with the law. We will ensure that the necessary measures are taken to prevent the transfer of your personal data to a party outside the EU or the EEA that does not comply with the legal requirements for the processing of personal data.

The European Commission has accepted using Standard Contractual Clauses to ensure adequate protection of data transferred outside the EEA. When these are added between the parties to the [data transfer standard contract clauses agreement](#), the personal data will be considered protected when transferred outside the EEA or the United Kingdom to countries where the adequacy decision does not apply. We may use these model contract clauses for data transfers when operating with sub-processors.

## **Registry protection principles**

The secure processing of your personal data is important to us. The information stored in the Service is stored in the system of the controller, which is protected by security software.

- Our employees have access to personal data only to the extent required for relevant work tasks.
- Access to the system requires the entry of a username and password. Firewalls and other technical means also protect the system.
- Only certain designated employees of the controller have access to and are entitled to use the data contained in the register stored in the system.
- User-specific IDs, passwords, and access rights protect the use of the register.
- The registry resides on a computer located in a computer room on a server to

This is an informative document that is written in accordance with General Data Protection Regulation (2016/679/EU) articles 12-14.

which unauthorized access is denied.

- The information contained in the register is located in locked and guarded premises.
- The register is regularly backed up.

## Changes

We might, from time to time, update the data processing terms. We will always inform you of any notable changes or if we need to use your data for other purposes than disclosed in these terms.

## Cookies

Our website uses so-called cookies. A cookie is a small text file that is sent to and stored on a user's computer, enabling the webmaster to identify visitors who visit the site frequently, to make it easier for visitors to log in to the site, and to compile aggregate information about visitors. With the help of this feedback, we are able to continuously improve the content of the Service's pages. Cookies do not harm users' computers or files. We use them in such a way that it can provide its customers with information and Services tailored to their individual needs.

In addition to using necessary cookies for our website to run properly, we use cookies for the following purposes:

- Targeted marketing
- Analysis and monitoring of the webpages (Posthog)
- ...

If you do not want us to receive any of the above information through cookies, most browser programs allow you to disable the cookie function. However, it is good to remember that cookies may be necessary for the proper functioning of some of the Services we maintain.

### Copyright Notice:

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