PRIVACY POLICY

This Privacy Policy explains how **FireFly Tech Oy** (hereinafter referred to as "we," "us," or "our"), a legal entity representing Casa Sonno, collects, uses, and safeguards your information when you use our website and services. By accessing our website, you acknowledge that you have read and agree to the terms of this Privacy Policy.

1. Definitions

- 1.1. **We** FireFly Tech Oy, registered in Finland (address: Sienimäenkatu 7 C 24, 55510 Imatra, Finland), operating under the Casa Sonno brand.
- 1.2. **Casa Sonno Service** an online platform provided by Casa Sonno for customer and partner interactions, as well as for information regarding the production and sale of oil products in large volumes.
- 1.3. **Visitor** any individual or entity accessing our website without registering an account.
- 1.4. **Account** a user profile granting enhanced access to the Casa Sonno Service, such as the ability to place orders, manage settings, and track transactions.
- 1.5. **Website** our online resource located at <u>casasonno.com</u> (example) and any of its subdomains.
- 1.6. **Our Email** the email address used to contact us regarding the collection and processing of personal data. By default: i.momot@fireflyfin.com
- 1.7. **GDPR** Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of personal data. Full text is available at: https://eur-lex.europa.eu/eli/reg/2016/679/oj.

2. Information We Collect

We collect information that you provide to us directly, as well as information automatically generated when you use our website and services. Specifically, we may collect:

- Contact Information: name, email address, phone number.
- Company Information: name, address, industry sector, company size, and so forth.
- Technical Data about Website Visits: IP address, browser type, and page visit details (through cookies or similar technologies).

3. How We Use the Information

Casa Sonno

We use the collected data for the following purposes:

- **Needs Assessment**: to understand your objectives and requirements related to the procurement or partnership in the production and sale of oil products.
- **Service Provision**: to fulfill orders and contractual obligations, including organizing deliveries, processing payments, managing projects, and other interactions concerning the supply of oil and oil products.
- **Service Improvement**: to analyze the effectiveness of our services, optimize business processes, and develop new products and offerings.
- **Communication**: to respond to inquiries and provide updates about product releases, special offers, and other relevant information.

4. Sharing Your Information

We do not sell, rent, or disclose your personal data to third parties for marketing purposes. However, certain data may be shared in the following cases:

- Trusted Contractors and Partners: to deliver services or perform operations on our behalf (e.g., IT support, logistics, payment systems). We require these partners to maintain confidentiality and use the data solely as per our contractual arrangements.
- Government and Regulatory Authorities: to comply with lawful requests, court orders, or legal processes, and to protect our rights and interests as permitted by law.

5. Data Security

We employ current technical and organizational measures to protect personal data from unauthorized access, alteration, or destruction. Such measures include:

- Encrypting data transmission (e.g., HTTPS).
- Secure servers and databases.
- Access control systems and internal policies for handling data.

However, please be aware that no security system can guarantee 100% protection, and we cannot completely eliminate the risks of unauthorized access.

6. Your Rights

Depending on applicable law, including the GDPR, you have the following rights regarding your personal data:

- Access: request a copy of all data we hold about you.
- Rectification: ask us to update or correct your information if it is outdated or inaccurate.
- **Erasure**: request the deletion of your data, unless otherwise required by law or contractual obligations.
- **Restriction of Processing**: object to or request restriction of processing your data in certain circumstances (e.g., for direct marketing).

• **Data Portability**: receive and transfer your data in a machine-readable format if provided by law.

To exercise any of these rights, please contact us at i.momot@fireflyfin.com

7. Data Retention

We retain your data only for as long as it is necessary to fulfill the purposes outlined in this Privacy Policy or as required by applicable law. After this period, we either delete or anonymize your data unless otherwise mandated by legal requirements.

8. Cookies and Similar Technologies

We use cookies and similar technologies to enhance the functionality of our website. These tools help us:

- Remember your preferences and settings.
- Analyze how visitors use our website.
- Personalize content.

You can manage your cookie settings in your browser. Disabling certain types of cookies may affect the functionality of the site.

9. Third-Party Links

Our website may contain links to external websites or resources. We are not responsible for the content or privacy policies of those resources, and we encourage you to review their respective terms and conditions as well as privacy policies.

10. Updates to This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. The current version will be posted on this page along with the effective date of the latest revision. Please review this page periodically to stay informed of any changes.

11. Contact Us

If you have any questions, concerns, or inquiries regarding this Privacy Policy or the handling of your personal data, you may contact us in any of the following ways:

- **Email**: i.momot@fireflyfin.com
- Postal Address: Sienimäenkatu 7 C 24, 55510 Imatra, Finland