



Quha Dwell 2 Privacy Policy

Quha Dwell 2 (“the Software”) is developed and provided by Quha oy, Pirkkalaistie 1, 37100 Nokia, Finland (“we,” “us,” or “our”). We are committed to protecting your privacy and handling your data in compliance with the General Data Protection Regulation (EU) 2016/679 (“GDPR”) and other applicable laws.

Data Controller

The data controller responsible for the processing of your personal data is:

Quha Oy
Pirkkalaistie 1
37100 Nokia, Finland
Email: info@quha.com

Personal Data We Collect

The Software does not collect or process personal data during normal use. The only time data is transmitted to us is during the license activation process. At that time, the following information is collected and stored:

- License information (activation and usage timestamp)
- Operating system information (the OS used to activate the license)
- Activation count (how many times the license has been activated)

This information may constitute personal data under GDPR if it can be linked to an identifiable individual.

Purpose and Legal Basis of Processing

We process the above data solely for the following purposes:

- Verifying and activating valid licenses
- Preventing misuse or unauthorized use of the Software
- Providing technical support related to licensing

The legal basis for this processing is Article 6(1)(b) GDPR: processing is necessary for the performance of the license agreement between you and Quha Oy.

Data Sharing and Processors

We do not sell, rent, or trade your data.

Your license activation data is processed and stored on secure servers hosted by our trusted service provider:

Code-Q Oy
Elektroniikkatie 2
90590 Oulu, Finland

Code-Q acts as a data processor on behalf of Quha Oy, in accordance with a data processing agreement, and processes data only for the purposes described in this Privacy Policy.

We do not transfer your data outside the European Economic Area (EEA). If such transfers become necessary, we will ensure appropriate safeguards in accordance with GDPR Chapter V.

Data Retention

We retain the collected data only as long as necessary to manage software licenses, provide related technical support, and comply with legal obligations. Once data is no longer required, it will be securely deleted.

Data Security

We implement appropriate technical and organizational measures to protect your data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access.



Your Rights

As a data subject under GDPR, you have the following rights regarding your personal data:

- Right of access (Article 15) – to obtain confirmation and access to your data
- Right to rectification (Article 16) – to correct inaccurate or incomplete data
- Right to erasure (Article 17) – to request deletion of your data when legally possible
- Right to restriction of processing (Article 18)
- Right to data portability (Article 20) – to receive your data in a structured, machine-readable format
- Right to object (Article 21) – to object to processing in certain circumstances

To exercise these rights, please contact us at info@quha.com. We will respond to your request in accordance with GDPR.

Right to Lodge a Complaint

If you believe your data has been processed unlawfully, you have the right to lodge a complaint with your local supervisory authority. In Finland, this is:

Office of the Data Protection Ombudsman
P.O. Box 800
00531 Helsinki, Finland
Website: <https://tietosuoja.fi>

Changes to This Privacy Policy

We may update this Privacy Policy from time to time. Any changes will be published within the Software and/or on our website with an updated effective date.

Contact

If you have any questions about this Privacy Policy or our data practices, please contact:

Quha Oy
Pirkkalaistie 1
37100 Nokia, Finland
Email: info@quha.com