

# Data Protection Policy for Clients - Interverbum Technology

## Introduction

Interverbum Technology AB is committed to protecting the integrity of clients' personal data. We will endeavor to be clear and transparent about what personal data we collect and how we use it.

This policy describes the following:

What personal data ("personal information") we collect and handle in our relationship with you as a client,

- where we gather data from,
- how we handle the data,
- how we store the data,
- who we transfer and/or share the data with,
- how we handle your rights to the protection of your personal data,
- how we follow the data protection regulations.

All personal data is collected and processed in accordance with Swedish and EU data management legislation.

## Data Controller

Interverbum Technology AB (also known as "we", "us", "our" or "InterverbumTech" in this policy) is the Data Controller of all personal information collected and used by InterverbumTech employees in accordance with the regulations set down by the Swedish Data Protection Authority (Datainspektionen). InterverbumTech's home office is registered in Stockholm, Sweden with the organization number 556570-4920.

## What personal data we collect and how it is used

Personal data is any and all information that directly or indirectly (i.e. together with other information) can be linked to you; e.g. name, image, official personal identification number, and purchase or billing history.

We will always process your personal data using applicable data protection laws. This means that each process has a so-called legal basis. Most processes are performed to enable us to provide a service, i.e. fulfill a contract with you or because we have a legal obligation.

When you sign a contract or otherwise engage in business with us, we process:

- Information you provide to us, such as name, official personal identification number, payment details, telephone number, e-mail address and other personal information.

This personal data is used in order to:

- Manage our client relationship with you, such as; to identify you as a client or handle payments for the services we provide for you.
- Handle and deliver any service or service-related matter in accordance with our contractual agreement.
- Notify you of changes or in your services or contract.

If we process your personal data for any other purpose that would require your consent, we will obtain your consent before taking such an action.

## How long do we save your personal information?

Your personal information is only stored for as long as it is required to fulfill the purpose of a process or as long as we have to, by law, store them. Personal data is then deleted from our records in accordance with our current security policy:

- Client information is stored for as long as you are a client with us and thereafter removed within 1 month from the final termination date of our client contract.
- Billing and accounting information is stored as long as required in accordance with applicable accounting laws and no more than 1 year thereafter.
- If you are a newsletter recipient, your data will be saved as long as you do not actively choose to unsubscribe.

## To whom do we provide your personal information?

We may need disclose your personal information to the following recipients:

- External partners, both in- and outside the EU / EEA, in order to provide the ordered services.
- Other recipients as required by Swedish law.

Written consent from the client is required before any and all personal information is disclosed to our external partners. The client will also be informed if and when we are required by Swedish law to disclose personal information to a third party such as; disclosing breaches of personal information to the Swedish Data Protection Authority.

Companies that handle personal information on our behalf must always enter into a so-called personal data-sharing agreement with us in order to ensure a high level of protection of your personal data with our partners.

If we use partners and / or suppliers outside the EU / EEA, we will take special safety measures such as; signed privacy agreements and agreements that include the

standardized data transfer clauses adopted by the EU Commission and available on the EU Commission website.

## How do we protect your personal information?

We protect the integrity of the users of our site and connected systems with technical and organizational measures. To ensure the secure transfer of personal data, we enforce the use of the encryption protocol SSL. All personal data (name, address, payment details, etc.) is thus encrypted and can be transferred safely to the internet.

## Data Protection Officer

We have appointed a Data Protection Officer ("DPO") to monitor compliance with this policy. The client is entitled to make a complaint to a regulatory authority at any time. The Swedish Data Protection Authority (Datainspektionen) has direct legal authority for InterverbumTech, as part of the Swedish Registry Management, in matters pertaining to breaches and compliance with this privacy policy.

## Data protection rights

Under certain circumstances, you have the right to:

- **Ask whether we have personal information about you**, and if so, what personal information we have and why we have / use it.
- **Request access to your personal information** (commonly known as a "request for database access"). This allows you to get a copy of the personal information we hold about you and make sure we treat it legally.
- **Request correction of the personal information we hold about you**. This will allow you to correct any and all incomplete or incorrect personal information we keep about you.
- **Request removal of your personal information**. You also have the right to ask us to entirely remove or delete your personal information where you have exercised your right to object to handling (see below).
- **Request a limitation on the handling of your personal information**. In this way, you may ask us to pause or cancel the handling of personal information about you, for example, if you wish to determine its correctness or the purpose for which it is being processed.
- **Request the transfer of your personal information in an electronic and structured form to you or to another party (commonly known as the right to "data portability")**. This allows you to receive your personal information from us in a standard data format.
- **Revoke consent**. Under certain circumstances, in which you may have consented to the collection, handling and transfer of your personal information for a particular purpose, you are entitled to withdraw your consent for the specific handling at any

time. Once we have received a notification of your revoked consent, we will no longer process your information for the purpose you originally agreed upon, unless we have another legitimate reason for doing so by law.

If you wish to exercise any of these rights, please contact our DPO by written mail addressed to our home office or by email to [dpo@interverbumtech.com](mailto:dpo@interverbumtech.com).

You are not required to pay a fee to exercise any of these rights. However, we may charge a reasonable fee if your request is clearly unfounded or excessive. Alternatively, we may refuse to follow a request in such cases.

We may require specific information from you to help us confirm your identity and ensure that you have the right to access the personal information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to someone who is not entitled to receive it.

## Changes to our Data Protection Policy for Customers

This document may be amended. Any changes made to this content will require us to notify you as a customer via email or a message on our web services and page.

*This specific document has been translated, in good faith, for the use of our English-speaking customers. Please note that the original Swedish version of this document supersedes this specific document in legal authority in regard to Swedish law.*