

## PELTARION PRIVACY NOTICE USER ACCOUNTS

Last modified: 12 April 2018

We take your privacy seriously. Please take the time to read the following information to learn more about what types of information Peltarion collects and how it is treated, when you register a user account at our platform in accordance with the terms of use (the “**Terms**”).

### **What personal data do we process?**

When you register a user account for the Peltarion platform and services, we will collect certain personal data from you in order to register you as a user and be able to provide the services to you in accordance with the Terms. Such personal data will include your name, address, telephone number, e-mail address and other required contact details, and potentially credit card information, bank account details or other relevant payment information, your behaviour on peltarion.com (including your method for setting up an account at the platform) (“**User Data**”).

### **Data Controller and contact information**

Peltarion AB, reg.no 556627-0129, is the data controller for the processing of your User Data.

If you have questions on our processing of your User Data, you can contact us at [privacy@peltarion.com](mailto:privacy@peltarion.com).

### **How we use your User Data and our legal basis**

We will process your User Data for account management, support, administrative and billing purposes and for the purpose of providing the services to you as set forth in the Terms. The legal basis for our processing is that the processing is necessary for the performance of the obligations under the Terms.

Further, we may process your User Data for the purpose of direct marketing, meaning that we may send you information and offers about similar products or services which we believe may be of interest to you. The legal basis for our processing is that it is necessary for our legitimate interest of maintaining good customer relations. You may always object to direct marketing from us, see further information under “Your rights” below.

In addition to the above, we may use your User Data for the purposes of analysing and developing the services and for marketing purposes. The legal ground for our processing is that the processing is necessary for our legitimate interests to improve our services and our marketing measures. To the extent the aforementioned purposes can be achieved on the basis of anonymized data, we will anonymize your User Data and aggregate it with other users’ anonymized data. When your User Data has been anonymized, the User Data will no longer be considered personal data under applicable data protection laws and for the purposes of this privacy notice.

### **Who do we share the User Data with?**

We may share your User Data with a subcontractor when needed to supply the services to you, for e.g. purposes of storage of personal data or troubleshooting and correction of any defects in the services.

### **Transfers of your User Data outside the EEA**

We will only transfer your User Data to a country outside the European Economic Area (EEA) where we have ensured that such transfer is legal under applicable laws, e.g. by (i) executing EU standard data protection clauses with the recipient of the personal data, or (ii) ensuring that the country has an adequate level of protection of personal data, as decided by the EU Commission, or (iii) for transfers to and processing in the USA, ensuring that the recipient holds self-certifying registrations under the EU-U.S. and the Swiss-U.S. Privacy Shield Frameworks administered by the U.S. Department of Commerce's International Trade Administration.

### **How long we will keep the User Data**

You can delete your account and User Data at any time. If Peltarion does not delete your User Data earlier in accordance with the Terms, your account and User Data will be deleted within 90 days after termination of the Terms. The aforementioned does not apply to the extent Peltarion is required to retain your User Data (partly or in full) for a certain period under applicable mandatory law.

### **Your rights**

You are entitled to the following rights under applicable laws:

- The right to access: you may at any time request to access your User Data. Upon request, we will provide a copy of your User Data in a commonly used electronic form.
- The right to rectification: you are entitled to obtain rectification of inaccurate User Data and to have incomplete personal data completed.
- The right to erasure (“right to be forgotten”): under certain circumstances, you may request us to delete your User Data. Please note that this right is not unconditional. Therefore, an attempt to invoke the right might not lead to an action from us.
- The right to object: you are entitled to object to certain processing activities conducted by the us in relation to your User Data, such as our processing of the User Data based on our legitimate interest. The right to object also applies to processing of your User Data for direct marketing purposes.
- The right to restriction of processing: you may under certain circumstances request from us to restrict the processing of your User Data. Please note that this right is not unconditional. Therefore, an attempt to invoke the right might not lead to an action from us.
- The right to data portability: you are entitled to receive the User Data (or have the User Data directly transmitted to another data controller) in a structured, commonly used and machine-readable format.

If you have any questions about how we process your User Data, or if you want to exercise your rights in accordance with the above, please feel free to contact us at [privacy@peltarion.com](mailto:privacy@peltarion.com). In case of any issues in relation to your User Data or other privacy concerns, you may also lodge a complaint with the Swedish data protection supervisory authority.