

# Privacy Policy

This privacy policy (the “**Privacy Policy**”) applies to any personal information obtained through Devyser AB’s (“**we**”/“**us**”/“**our**”/“**Devyser**”) online channels including websites, mobile applications and social media pages that reference this Privacy Policy (the “**Online Channels**”).

For the purposes of this Privacy Policy any reference to “**Affiliate**” shall mean an entity that, directly or indirectly, owns or controls, is owned or is controlled by, or is under common ownership or control with Devyser.

This Privacy Policy describes the types of personal information we obtain, how we may use that personal information, with whom we may share it, and how you may exercise your rights regarding our processing of the information.

## 1. Personal information that we obtain

We may obtain personal information through the Online Channels. The types of personal information we may obtain include:

- contact information (such as name, phone and fax number, email and postal address) for you or for others (e.g., principals in your business). By supplying your contact information, you authorize Devyser to contact you with further information. You further authorize Devyser to pass your information to its regional sales representatives for these purposes.
- information used to create your online account (such as username and password)
- Cookies are used to enable an enhanced browsing experience on the company website (see separate Cookie Policy on the website for more information)

Please note that providing personal information to us is voluntary on your part. If you choose not to provide us with certain information, we may not be able to offer you certain products and services, and you may not be able to access certain features of the Online Channels.

## 2. How we use your personal information

We may use the personal information we obtain through the Online Channels for the following purposes on the legal basis following each purpose:

- to provide and administer our products and services.
- *Legal basis:* Fulfillment of a contract with you or a relevant party.
- to communicate with you regarding our products, services, events, programs and promotions (such as by sending alerts, promotional materials, newsletters and other marketing communications).
- *Legal basis:* Our legitimate interest to promote our products, services, events, programs and promotions.
- to develop our services and website through analyzing the use of our services
- *Legal basis:* Our legitimate interest to develop our services and website.

We may further process personal information for other purposes with respect to specific services. Prior to such further processing we will obtain your specific consent pursuant to the processing in connection with such specific services. You will be able to withdraw your consent at any time.

### **3. Sharing of your personal information**

We do not sell or otherwise disclose personal information about you except as described here or at the time of collection.

- We may share personal information within Devyser and with any Affiliate for the purposes described in this Privacy Policy.
- We may share personal information with service providers we have retained to perform services on our behalf. These service providers are contractually required to safeguard the information provided to them and are restricted from using or disclosing such information except as necessary to perform services on our behalf or to comply with legal requirements.
- We may disclose personal information about you (1) if we are required or permitted to do so by applicable law or legal processes (such as a court order or subpoena), (2) to law enforcement authorities or other government officials to comply with a legitimate legal request, (3) when we believe disclosure is necessary to prevent a personal data breach that may result in, *inter alia*, physical harm or financial loss, (4) to establish, exercise or defend our legal rights, (5) in connection with an investigation of suspected or actual fraud or illegal activity or (6) otherwise with your consent.
- Devyser or a substantial part of Devyser may be acquired by a third party. In such case we may share your personal information with such third party as a consequence of such acquisition. The sharing of personal information in such case is based on our legitimate interest in being able to carry out a disposal of our operations.
- In exceptional circumstances your personal information may be processed outside EU/EES. In such situations, we will ensure that there is a legal basis and a relevant method for such data transfer (or access) so that your personal data is treated and processed in a manner consistent with EU laws and other applicable laws and regulations on data protection. Personal data will only be transferred to countries outside EU/EES if the European Commission has decided that the third country ensures an adequate level of protection, or if appropriate safeguards are provided or if such transfer is otherwise permitted according to Chapter V of the General Data Protection Regulation (GDPR).

### **4. Your rights**

We offer you certain choices in connection with the personal information we obtain about you. To update your preferences, limit the communications you receive from us, or submit a request, please contact us as specified in section 8 of this Privacy Policy.

Furthermore, you have the following rights with respect to our processing of your personal information.

#### **4.1 Right to access**

You have the right to demand confirmation and information of our processing of your personal information.

#### **4.2 Right to rectification**

You have the right to request that we update, correct or amend your personal information should you consider it inaccurate.

#### **4.3 Right to erasure (“the right to be forgotten”)**

You have the right to have your personal information erased provided that there is no legal obligation for us to continue to retain the personal information.

#### **4.4 Right to restriction of processing**

You have the right to obtain restriction of the processing of your personal information, *inter alia*, when the accuracy of the personal information has been contested by you.

#### **4.5 Right to data portability**

You have, under certain circumstances, the right to transmit the data to another controller, for example if the processing is based on your consent or on a contract between you and Devyser. The right to data portability is solely applicable to personal information obtained from you.

#### **4.6 Right to object**

You have the right to object, at any time, to the processing of your personal information which is based on a weighing of interests. Devyser shall no longer process the personal information unless Devyser demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. Where personal data are processed for direct marketing purposes, you shall have the right to object at any time to processing of personal data for such marketing purposes.

#### **4.7 Right to complain to the Swedish Authority for Privacy Protection**

If you consider that your rights are not being respected by us, you may notify us and you also have a right to lodge a complaint with the Swedish Authority for Privacy Protection (Sw. *Integritetsskyddsmyndigheten* (IMY)).

To request to exercise these rights, please contact us as indicated in section 8 of this Privacy Policy.

### **5. Data protection**

We maintain administrative, technical and physical safeguards, consistent with applicable requirements where the personal information was obtained, designed to protect against unlawful or unauthorized destruction, loss, alteration, use or disclosure of, or access to, the personal information provided to us through the Online Channels.

### **6. Retention of your personal information**

To the extent permitted by applicable law, we retain personal information we obtain about you as long as (1) it is needed for the purposes for which we obtained it, in accordance with the provisions of this Privacy Policy or (2) we have another lawful basis, stated in this Privacy Policy or at the point of collection, for retaining that information beyond the period for which it is

necessary to serve the original purpose for obtaining the personal information. Prior to such further processing you will be provided with information on that other purpose.

## **7. Additional information**

### **7.1. Children's Personal Information**

The Online Channels are designed for a general audience and are not directed toward children under the age of 18. If we become aware that we have collected personal information from a child under the age of 18, we will promptly delete the information from our records.

### **7.2. Changes to the Privacy Policy**

We reserve the right to update and make changes to this Privacy Policy at any time. If the changes are substantial, you will obtain information about the changes through e-mail. The latest version of the Privacy Policy will always be available at our website and we will indicate at the bottom of the Privacy Policy when it was most recently updated.

## **8. How to contact us**

If you have any questions or comments about this Privacy Policy or if you would like us to update information we have about you or your preferences, please write to us at [gdpr@devyser.com](mailto:gdpr@devyser.com) or:

**Attn: GDPR Officer**

Devyser AB  
Bränningevägen 12  
120 54 Årsta  
Sweden