Privacy Policy
for Information Clients

Welcome!

In this privacy policy we describe how we comply with the General Data Protection Regulation (GDPR) when we process personal data of everybody that receives our information products. With this term we mean all kinds of information that we send regarding ourselves, our business, our products and what we are up to next.

If you do not belong to this category, you will find the relevant information concerning your case in connection to where this privacy policy is available.

Data Controller
We operate all over the world, but we are domiciled in Sweden. Our name, corporate ID-number, physical address and e-mail is: Bambuser AB (org. nr 556731 - 3126) Regeringsgatan 55, 111 56 Stockholm, Sweden.
e-mail: info@bambuser.com

Data Protection Officer
Of course we have a DPO. To get in touch, send an e-mail to: dpo@bambuser.com

For the sake of clarity, the terms “we, us, our” etc. in this privacy policy always refer to this company.

Purpose, type of personal data, and legal ground
We have two purposes for processing your personal data as an information client. Either, to transfer the information product that you ask for. Or, to transfer the information product that we have a well founded reason to believe that you are interested in.

Typically, the personal data processed to achieve these purposes would be your name, contact data, job title and company name. Exactly what data is processed in your case depends on your professional function and the information product in question.
The legal ground for processing is either a contract or our legitimate interest.

If the legal ground for processing your personal data is a contract, it means that you have demanded an information product from us. A typical example would be that you sign up for one of our newsletters, e.g. the investor newsletter.

If the legal ground is our legitimate interest, it means that we have sent you an information product that you have not personally demanded. We simply reached out to you in order to spread the word about us and the good professional use we and our services and solutions in live video shopping and influencer marketing would do to you and the company you work for. Before we sent you the information product you received, we did a balancing test to check if our interest in reaching out to you outweighs your interest in keeping your personal data to yourself. Two important aspects of this balancing test are the facts that we only reach out to you as a business person for a business reason and that the personal data processed is the kind of data that business people use in order to get in touch with potential partners. We either got your data directly from yourself or a contact of yours, or your data was found somewhere on a company webpage or a platform account or so. By platform account we mean LinkedIn, Instagram, Facebook and such. In all cases, we use the data for the purpose for which it was published. These facts put together clearly points in favour of our processing. Of course, you are still fully entitled to tell us you don’t agree with our processing and that you want us to stop. Such an issue, and others of the same kind, are treated below under the headline Your rights.

**We only share your data with those we have to**

We do not sell your personal data, nor do we give it to any third parties. We only share it with our processors. They are necessary to keep the technique rolling, which we absolutely need in order to keep our business rolling. Our processors do not use your personal data for any purpose of their own. If you and we interact on a platform, i.e. LinkedIn, then the privacy policy of that platform also applies, since the platform owner is the controller of their processing. If governmental or other authorities ask for your data, we only share it if there is a legal obligation to do so.

**Storage period**

We store your data for the stated purposes as long as it is meaningful. If the purpose is to send you information you have asked for, i.e. subscription to a newsletter, then we will continue to do this until you ask us to stop.
If the purpose is to get you interested in some form of interaction with us, such as participating in an event or initiating a purchase process, and you do not show any such interest, then we will delete your personal data after three unsuccessful contact attempts. Unless of course you tell us at an earlier stage that you're not interested, then we delete your personal data as soon as we get such a message.

**Your rights**
You are always free to get in touch with us and ask what personal data we have about you. You may ask for their rectification or erasure, that the processing should be restricted or ceased and that your data should be transferred to somebody else. We will do what you ask us to do, provided that no other laws or rules prevent us. In any case, we will get back to you and reply to your demand and we will tell you what measures we have taken and on what grounds. We use automatic reply functions, but no automated decisions and no profiling.

**Transfers to third countries**
We keep the maximum of our personal data processing within the EU/EES, but this is not always possible. If it is necessary, in order to send you an information product that you have demanded, then we may transfer data to third countries. For the same reason, it may also be necessary to store data in third countries. The legal ground for such transfers would be article 49.1(b) GDPR, since the contract in question is concluded directly with you. Should we contact you on our own initiative and should this involve a third country transfer, it would either be because you yourself are in such a country or because the platform on which we interact uses such transfers. In that case, the rules of the platform in question would also apply to this issue, and we would not be able to interact on that platform unless you had not already accepted the terms of service applicable to that platform.

**About changes to this privacy policy**
This privacy policy is a dynamic document, which means that it will change if the way we do business changes. Should this happen, then the new privacy policy will replace the old one with immediate effect. Since it can neither be considered to be a legal obligation nor meaningful in any other way, we will not communicate such a change of privacy policy in any other way than to publish the new privacy policy here.

**The right to lodge a complaint**
We believe that the way we process personal data complies with the GDPR. Should you be of another opinion, we would appreciate it if you tell us what you believe is wrong. You are also free to lodge a complaint with the Swedish supervisory authority, Integritetsskyddsmyndigheten, IMY. If it is more convenient to you, you may lodge your complaint with another supervisory authority.

*This privacy policy was last updated on the 5th of October, 2022.*