

## PRIVACY POLICY

We at Appspotr AB, corp.reg.no 556717-2365, (“**Appspotr**”, “**we**”, or “**us**”) are committed to protecting and respecting our customers’ privacy. This privacy policy describes how we collect and use personal data about our potential and current customers, suppliers and business partners.

This privacy policy describes how we collect and use personal data (as defined in the General Data Protection Regulation (EU) 2016/679, the “**GDPR**”) in connection with use of our Services. This privacy policy also describes your rights as a data subject and how to enforce them.

We are responsible for the processing of your personal data as described herein, as a data controller (as defined in the GDPR). Please do not hesitate to reach out to us if you have any questions or comments on our processing of personal data. Reach us by sending an e-mail to [info@appspotr.com](mailto:info@appspotr.com) or contact us at:

Appspotr AB  
Kungsporsavenyn 32  
411 36, Gothenburg  
Sweden

*In cases where we process data on behalf of you or your employer as data processors, we will process personal data in accordance with the instructions we have received under the personal data processing agreement we have entered into with you or your employer. That processing is not included in this privacy policy since this policy describes the processing we do as a data controller. Therefore, “**you**” hereinafter refers to you who use the Appspotr platform (“**Platform**”), the website or other services we provide to you (“**Services**”) or is in contact with us on behalf of a legal entity who, for example, might be your employer. The “**Company**” refers to the legal entity which you are representing as an employee, consultant or similar.*

### 1. PERSONAL DATA THAT WE PROCESS

We process the following categories of personal data about you:

- **Contact information.** We will process contact information such as your name, phone number, email-address and postal address.
- **Company-related data.** This means information regarding the Company, such as your work e-mail address and if necessary, information regarding your right to represent the Company. This is applicable when you contact us in the role of representative of a company.
- **Personal identification number.** If you are a sole trader, we will process your personal identification number as it is the same as your company registration number.

- **Communications data.** We will collect and store your communication with us and any information provided to us in such communication, for example when e-mailing us. Please note that we receive any information you send to us. Because e-mail communications are not always secure, we encourage you to not include sensitive data in your e-mails to us and avoid sharing sensitive data with us.
- **Billing data.** To receive payment for the Services, we will:
  - **If sending you an invoice,** process your personal information if necessary, to provide a reference on the invoice, or
  - **If credit card-payment is used,** process the four last digits of your credit card number.
- **Technical data.** We will collect technical data from the computer (or other device) you use in connection with your use of the Site and the Services such as IP address, browser type and version, screen resolution, preferred language, geographic location, operating system and computer platform. Even though we do not normally use technical data to identify individuals, sometimes individuals can be recognized from it.
- **Sensitive data.** We will process sensitive data about you if you provide us with such information and only to the extent necessary and justified.
- **For customers who use the Platform:**
  - **User account data.** Your username and e-mail address will be processed to provide you access to the Platform.
  - **User activity logs.** We save information about your activity in the Platform in order to analyze users' use of the Platform for improving the Platform, but also to enable customer support.
  - **Customer support-related information.** To be able to provide customer support we will process the information necessary to handle the matter, such as contact details, communications data and technical data.
  - **Survey data.** If you are a customer to us, we may contact you to participate in online customer satisfaction surveys. If you decide to participate, you may be asked to provide certain information which may include personal information.

## 2. HOW WE GATHER YOUR PERSONAL DATA

**Information you give to us.** Most of the information we process about you is received from you. You may directly or indirectly give us information about yourself in different ways, for example when you or the Company subscribe(s) and register(s) for the Services. You can always choose not to provide us with certain information. However, some personal data is necessary in order for us to provide you with our Services. Not providing such personal data may prevent us from providing our Services to you or, if applicable, the Company.

**Information we collect about you.** We may also, responsibly and with your privacy in mind, obtain personal data about you from your employer or the website of your employer.

**If you register your account through a third-party service-provider, e.g. Facebook,** we will collect your name and email-address from that third-party service-provider.

### **3. HOW YOUR PERSONAL DATA WILL BE USED AND THE LEGAL GROUNDS FOR IT**

If you have subscribed for the Services (or subscribed for our Services on behalf of the Company) we may process your personal data for the following purposes and based on the following legal grounds:

- **To communicate with you.** Your contact details will be used to communicate with you. This processing can either be necessary for us under our contract with you or your employer or for our legitimate interest in effective communication with our customers and business partners.
- **To market our services.** Your contact information will be used to send newsletters, information and marketing regarding our services. This processing is based on our legitimate interest of being able to market us and our current and future services, as you have shown an interest in our Services. Feel free to follow the unsubscribe instructions contained in the e-mail received from us or contact us directly.
- **If you are a sole trader, to identify you and the Company.** We process your personal identification number as a part of the information we keep about the Company and to identify you as the representative of the Company. This is necessary for the identification process and for our legitimate interest of being able to identify our customers, suppliers and business partners.
- **To fulfil our legal obligations.** Appspotr is obliged to follow Swedish law. This means that your personal data will be processed to the extent necessary for us to fulfil our legal obligations, for example the Swedish Accounting Act.
- **To protect our legitimate business interests and legal rights.** We will use your personal data where we believe it is necessary to protect and enforce our legal rights, interests and the interests of others, for example in connection with legal claims, compliance, regulatory and audit functions.
- **In connection with a merger or acquisition.** In connection with, due to strategical or business-oriented reasons, a potential merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company, the personal data we retain about you may be processed, shared or transferred, to parties involved in the process. This processing is based on our legitimate interest of being able to develop our business.

- **With your consent.** Your personal data may be used for other purposes than stated above if you ask us to or you give us your consent. For example, if you are one of our customers, we might contact you asking for your consent to publish a customer review by you for the purpose of marketing our Services.
- **For billing purposes.** If you or the Company have ordered services from us or we have bought services from you, your personal data may be used for billing purposes. This includes having you as an invoice-reference. This processing is necessary and is based on our legitimate interest of being able to bill and administer our payments.
- **To administer our agreements.** If you are our customer or supplier, personal data will be processed when we enter into and during the agreements with you or the Company. This is necessary for us to be able to enter into and fulfil agreements with you or the Company and for our legitimate interest in being able to enter into and fulfil different types of agreements and to have a contact person in connection with the agreement.
- **To conduct customer surveys.** Based on our legitimate interests, such as our interest in developing and improving our Services your contact information may be used to contact you regarding customer surveys. By continuously collecting qualitative feedback from you and other users, we can gain a deeper understanding of problems with our Services and needs of our customers.

Participation in customer surveys is however optional and processing of any answers to surveys is based on your consent. To the extent possible we avoid collecting personal data in connection with customer surveys, but if it necessary for the purpose of the survey we may collect personal information.

- **For customers who use the Platform:**
  - **To register an account.** We will process user account data to register an account. This is necessary to enter into a contractual relationship with you or the Company regarding the Platform and to pursue our legitimate interests, such as our interest in simplifying the registration process for our users and administering the contractual relationship.
  - **To provide the Platform to you.** We will continue to process your personal data (contact information such as username, e-mail address) to provide the Platform to you (or to the Company). This is necessary to fulfill our contractual obligations to you or the Company with respect to the Platform.
  - **To provide customer support.** Your personal data (e.g. user account data, technical data) will, when necessary, be used to investigate, respond to and resolve potential complaints and problems associated with the Platform (e.g. bugs). This processing is necessary to provide you with the Platform and upholding our obligations under our contract with you or your employer and for our legitimate interest in the functionality of the Platform.

- **To develop and improve our business and Services.** We use technical data, such as user activity logs, survey data, and other aggregated and non-personal information to develop and improve our Services including troubleshooting, data analysis, research, statistical purposes and testing (such as beta testing and evaluation of new features, in line with the fundamental nature of the Platform). For example, we may collect and evaluate technical data about your use of the Platform for analytical purposes, to understand how users use the Platform in order to make it more intuitive. This processing is partly necessary to provide the Platform to you but mainly to pursue legitimate interests, such as our interest in developing and improving the Platform, other Services and features.

#### 4. HOW WE SHARE YOUR PERSONAL DATA

Sometimes, we need to share your personal information with other trusted individuals and companies. Your personal information is shared with:

- **Our employees and consultants.** Your personal data will, when appropriate, be shared with some of our employees and consultants. However, we will restrict access to those of our employees and consultants who need it to perform their jobs, for example to provide you with customer support. Our employees and consultants are of course subject to strict confidentiality.
- **Our service providers.** We transfer to or share your personal data with our subcontractors who help us provide the Service to you which require the processing of personal data. The services include:
  - Managing customer support-matters regarding the Platform,
  - Credit card processing,
  - IT-service for the performance of our Services and services that handle necessary, technical support and maintenance of our IT-solutions. This includes storage of your information by our web host,
  - analysis of how our Services are used.

We provide personal data to third parties solely for the purpose of delivering the Service and to manage our daily operations including marketing of our services. Our subcontractors are not authorized by us to use or disclose your personal data except as necessary to perform services on our behalf or to comply with legal requirements.

- **With users of the application you build in the Platform (“End-Users”), if you choose to.** The Platform provides options and functions to communicate with End-Users, for example push notifications or emails. If you use such a function, End-Users will receive the personal information you choose to include in such communication.

- **Authorities and other public actors.** Sometimes legal obligations may require us to share information about you, for example to respond to lawful requests from law enforcement agencies, regulatory agencies, and other public and government authorities. We may also disclose information if needed to detect and prevent fraud or in connection with a legal process, for example to enforce our agreements or to protect our rights, you or others.
- **Third-party modules.** If you choose to activate a third-party module/integration available in the Platform, information about you and account details may be shared as necessary for the third party to provide the module. Please note that we are not responsible for the further processing of such third-party service and their privacy practices, why we highly recommend that you review the privacy information made available by such third-party services.

## 5. WHERE WE PROCESS YOUR PERSONAL DATA

Appspotr always strives to process and store your data within the EU/EEA. However, your data may in certain situations be transferred to, and stored at, a destination outside of the EU/EEA territory.

Please note that privacy laws in countries outside of the EU/EEA may not be the same as, and in some cases may be less protective than, privacy laws in your country. However, we always select our service providers carefully and take all the necessary steps to ensure that your personal data is processed with adequate safeguards in place in accordance with the GDPR. These safeguards are either that we sign the EU Commission Standard Contractual Clauses or ensure that the service provider is established in a country which the EU Commission has deemed as having adequate privacy protection or, if the company is established in the United States, certified under Privacy Shield.

Please contact us for more information about the applicable safeguard in a specific case.

## 6. HOW LONG WE KEEP YOUR PERSONAL DATA

Appspotr keeps your personal data only for as long as necessary to fulfil the purposes for which it was collected. How long depends on the type of information and why we process it. We regularly review our need to keep data, taking into account applicable legislation.

If you or the Company use the Platform, we generally save your personal data for as long as you subscribe to the Platform and as needed for tax and book-keeping purposes etc. Upon termination of the account your data might be stored up until one (1) month after termination due to technical reasons.

Personal data processed on the basis of your consent will be deleted when your consent is withdrawn or upon expiry of the purpose for which your consent was given.

Moreover, we store data to the extent we believe it is necessary to protect our legal rights, legitimate interests and the interests of others. Your data may also be stored for a longer period if required by applicable statutory retention periods.

## 7. CHILDREN'S PRIVACY

Appspotr does not knowingly collect any personal data from any individual under the age of 13 or knowingly allows such individuals to register for the Platform. The Platform and its content are not directed at children under the age of 13. If we become aware that we have collected personal data from a child under the age of 13 without parental consent, we will address the matter directly. If you believe that we may have collected any personal data from or relating to a child under the age of 13, please contact us.

## 8. YOUR RIGHTS

- **Right to object.** You have right to object to processing based on legitimate interest. This means that we may no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests. You can always contact us for more information on the balance test that has been made.

You may also object to your personal data being processed for direct marketing purposes.

- **Right to access your data.** You have the right to request a transcript of personal data processed by us, and additional information on how the data have been collected, processed, shared, etc. The first transcript may be requested free of charge, however if you make repeated and unreasonable requests for copies we might charge you with an administrative fee.
- **Right to transfer your data.** You have the right to transfer your personal data to another controller under certain conditions.
- **Right to rectification.** You have the right to correct inaccurate or incomplete information about yourself.
- **Right to erasure ('right to be forgotten').** You have the right to request that we delete personal data about you, for example if the data is no longer necessary in relation to the purposes for which it was collected or otherwise processed, or if there is no legal basis for processing the data.
- **Right to restriction.** You are entitled to request that the processing of your personal data should be limited until inaccurate or incomplete information about you has been corrected, or until an objection from you have been handled.
- **Right to withdraw your consent.** You may at any time withdraw any consent you have given us. However, please note that it will not affect any processing that has already taken place.

- **Right to complain.** You have the right to lodge a complaint to the Supervisory Authority in the country you live or work in, if you believe that we have not complied with our obligations regarding your personal data.

In Sweden the Supervisory Authority is *Datainspektionen*, which also is our lead supervisory authority, and you can find more information at their website: <https://www.datainspektionen.se/>.

Your contact and billing information is accessible through the Platform and you can adjust your information at any time. We encourage you to review this information continuously and keep it up to date so that your customer support requests and the billing process operate efficiently.

Please note that if you request restriction or erasure it might affect our abilities to provide our services to you. Moreover, legal rights or obligations (such as confidentiality, accounting and tax legislation) may prevent us from disclosing or transfer all or part of your information, or from immediately deleting your information.

## 9. CHANGES IN THIS PRIVACY POLICY

This privacy policy may be updated periodically to reflect changes in our collection and use of your personal data. You will be informed of any significant changes (e.g. by e-mail or in the Platform's dashboard interface), but we also recommend that you review this privacy policy from time to time to ensure you are aware of any amendments.