

# GRAPHN PRIVACY POLICY

## 1 BACKGROUND

GraphN AB, corp. reg. no 559250-6090, ("**GraphN**" or the "**Company**") is committed to processing your personal data in a secure manner, with a good level of protection and in accordance with applicable legislation.

In this privacy policy we describe how GraphN processes your personal data as a subscriber of our newsletters and as a beta-tester of our software launches. This Privacy Policy also applies to visitors of our website [www.polygonflow.io](http://www.polygonflow.io) and jobseekers.

If you have any questions regarding GraphN's protection of privacy, please do not hesitate to contact the Company by sending an e-mail to [info@polygonflow.io](mailto:info@polygonflow.io).

## 2 CONTROLLER

GraphN is the controller of your personal data and is therefore responsible for your personal data being processed in a correct and safe manner in accordance with applicable law.

## 3 WHAT PERSONAL DATA DOES GRAPHN PROCESS?

Personal data means any information which can be used to, directly or indirectly, identify a living natural person. Personal data includes information about you and your person. Examples of personal data are names, contact data and IP-addresses.

Processing means any operation which is performed on personal data, such as collection, storage, use, processing and transfer of personal data.

### Visitors of GraphN's website

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In connection with you visiting GraphN's website, we collect the following information about you.

- Technical information, such as IP-address, MAC-address, URL, unique device ID, network and computer performance, browser type, language and identification settings, geographical location, operating system and other data from cookies or similar (device information).

### GraphN users (persons with a GraphN license)

In connection with you using our software, GraphN collects the following information.

- Information on which functions, tools or other features of our products that are used

When subscribing with our resellers, payment service providers and/or license management suppliers (e.g. FastSpring and LicenseSpring), your personal data is collected in accordance with such providers' privacy policies. In addition, such providers share the following information with us.

- Email
- First and last name
- Company name
- Address
- City
- State/Province
- Country
- Post/Zip code
- Subscription information
- Private keys
- IP address
- Order information (i.e., products purchased, license types, time of purchase)

#### **Subscribers of GraphN's newsletters and persons subscribed for our beta software before releases**

In connection with you registering as a subscriber to our newsletters and thereby registering as a beta-tester of our software launches, GraphN collects the following information about you.

- Name
- Email address

#### **Recruitment (jobseekers with GraphN)**

During recruitment processes GraphN collects the following information about you.

- Personal and contact information, such as name, postal address, phone number, email address, title, position and employer.
- Information in cover letter and/or CV.
- When applicable, image.
- Other information that you provide to us in connection with recruitment.

Personal information about you can be handed over to us directly from you or from staffing, recruitment or hiring companies through which you are looking for work.

#### 4 OUR PROCESSING OF YOUR PERSONAL DATA

The purposes for which we process your personal data and the legal basis for each processing activity is presented in the tables below.

##### Visitors of GraphN’s website

Purpose	Legal basis
<p>To ensure the operation of GraphN’s website.</p> <p>To improve, streamline, simplify and develop GraphN’s website based on how the website (www.polygonflow.io) is used.</p>	<p>The processing is necessary for GraphN’s legitimate interest to improve, streamline, simplify and develop its website and to attract more visitors and subscribers and to increase the degree of returning visitors (balancing of interests).</p>

##### GraphN users (persons with a GraphN license)

Purpose	Legal basis
<p>For marketing purposes, e.g. to send newsletters or inform you about offers related to our products.</p>	<p>The processing is necessary for GraphN’s legitimate interest to market GraphN’s products (balancing of interests).</p>
<p>For general product development purposes, e.g. by using data on which functions or tools that are used the most/least to further develop and enhance our products.</p>	<p>The processing is necessary for GraphN’s legitimate interest of enhancing current products and developing new products (balancing of interests).</p>
<p>To provide you with our services and take the necessary steps to enter into a contract with you.</p>	<p>Performance of a contract (consumers).</p> <p>The processing is necessary for GraphN’s legitimate interest in providing products in accordance with the contract (balancing of interests).</p>
<p>For the establishment, exercise or defence of legal claims.</p>	<p>The processing is necessary for GraphN’s legitimate interest in establishing, exercising or defending any legal claims (balancing of interests).</p>

**Subscribers of GraphN’s newsletters and persons subscribed for our beta software before releases**

<b>Purpose</b>	<b>Legal basis</b>
<b>To be able to send our news letters to you and introduce you to the beta testing of our software launches.</b>	<b>The processing is necessary for GraphN’s legitimate interest to market itself by distributing newsletters and registering beta-testers of its software launches (balancing of interests).</b>

**Recruitment (jobseekers with GraphN)**

<b>Purpose</b>	<b>Legal basis</b>
<b>In order to recruit and in connection with recruitment be able to determine who is best suited for a position and to ensure that the person in question has the necessary competence.</b>	<b>The processing is necessary for GraphN’s legitimate interest to employ the right personnel and to ensure that competent persons work for the Company (balancing of interests).</b>

**5 HOW LONG DO WE STORE YOUR PERSONAL DATA?**

Your personal data is stored as long as there is a need to retain it in order to fulfill the purposes for which the information was collected in accordance with this privacy policy. Thereafter, your data will be deleted.

Names and email addresses to beta-testers and subscribers of our newsletters will be deleted as soon as such person unsubscribes or GraphN otherwise becomes aware that the information is no longer adequate or relevant for the purpose.

**6 TRANSFER OF PERSONAL DATA TO THIRD PARTIES**

GraphN will not transfer personal data to any third party, unless the Company is required to do so by means of a legal obligation, or when necessary to fulfil our commitments to you. To provide you with our services and products, we share your information with our suppliers, such as IT service providers or resellers and payment service providers (e.g. FastSpring) as necessary for them to provide their services to us.

Your personal data will not be sold to any third party for marketing purposes. However, your personal data may be transferred to other companies within the company group since key functions such as marketing, human relations, finance and structural changes are jointly managed within the company group of GraphN.

## **7 TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES**

GraphN may transfer your personal data to countries outside the EU/EEA. If personal data is transferred to a country outside the EU/EEA, GraphN will take necessary actions to ensure that the personal data continues to be protected and will also take the actions necessary to legally transfer personal data to countries outside the EU/EEA.

The personal data that GraphN collects through your use of GraphN's website may be transferred to Google in the USA, through Google Analytics. GraphN has secured that your rights are protected when your personal data is transferred to the USA by entering into the European Commission's Standard Contractual Clauses with Google. Further information on the Standard Contractual Clauses and other safety measures is available on the Swedish Data Protection Authority's website.

Personal data may also be shared with the reseller or payment service provider used in connection with your purchase (e.g. FastSpring) if necessary for the purposes set out in this privacy policy. GraphN has secured that your rights are protected when your personal data is transferred to the USA by entering into the European Commission's Standard Contractual Clauses with FastSpring. Further information on the Standard Contractual Clauses and other safety measures is available on the Swedish Data Protection Authority's website.

## **8 SOCIAL MEDIA**

Regarding personal data that is processed on social media, such as Facebook, Instagram and LinkedIn, we refer to the privacy policies of each social media for information on how such companies processes personal data. According to GraphN the purpose of the processing of personal data is to enable beta-testers, subscribers of our newsletters and jobseekers to interact with and contact GraphN through social media. This is aimed to contribute to a good relationship between GraphN and such persons as well as to make GraphN's service easily accessible through several channels. The processing is necessary for GraphN's legitimate interest of marketing its trademark and services (balancing of interests).

## **9 YOUR RIGHTS**

As controller, GraphN is responsible for ensuring that your personal data is processed in accordance with current legislation.

GraphN will, at your request or on your own initiative, correct, anonymize, delete or supplement information that is found to be incorrect, incomplete or misleading.

You have the right to request access to and correction or deletion of your personal data from GraphN (for example if such deletion is required by applicable law), request restriction of further processing of your personal data and a right to object to the processing under the conditions permitted by applicable personal data legislation. (for example, if you question whether the personal data is correct or whether the processing is legal). GraphN will notify each recipient to whom the personal data has been disclosed of any corrections

or deletion of data as well as restrictions on the processing of data that takes place in accordance with this section 9.

You are entitled to data portability, i.e. a right to under certain circumstances receive your personal data in a structured, accessible and machine-readable format, which can be transferred to another controller.

If you do not want GraphN to process your personal data for direct marketing, you have the right to notify this in writing to GraphN at any time. Once GraphN has received your notice, GraphN will cease to process the personal data for this marketing purpose.

You have the right, through a written signed application, to receive free of charge a register extract from GraphN about which personal data is registered about you, the purposes of the processing and to which recipients the data has been or will be disclosed. You also have the right to receive information in the register extract about the predicted period during which the data will be stored or the criteria used to determine this period. You also have the right to receive information about your other rights stated in this section 9 in the register extract.

Should you be dissatisfied with our processing of your personal data, please let us know, and we will do our best to respond to your complaints. Should GraphN fail to meet this ambition, you have a right to submit a complaint with the Swedish Data Protection Authority Sw. *Integritetsskyddsmyndigheten (IMY)*, or the supervisory authority where you are domiciled.

## **10 THE PROTECTION OF YOUR PERSONAL DATA**

Our ambition is for you to always feel safe when you submit your personal data to us. GraphN has therefore taken the necessary security measures to protect your personal data against unauthorized access, alteration and deletion. We will not disclose your information to anyone other than what is expressly stated in this privacy policy.

## **11 CHANGES TO THIS PRIVACY POLICY**

GraphN has the right to change the privacy policy at any time. In the event of changes to this privacy policy, GraphN will publish the revised privacy policy at [www.polygonflow.io](http://www.polygonflow.io). The policy was last updated in July 2021. Please note that the version available on the Company's website shall be deemed to be the latest version.

## **12 CONTACT**

Do not hesitate to contact GraphN if you have questions regarding this privacy policy, the processing of your personal data, or if you want to request a register extract.

GraphN contact information:

GraphN AB

Corporate registration number: 559250-6090

Address: Villagatan 18, 114 32 Stockholm, Sweden

Email: [info@polygonflow.io](mailto:info@polygonflow.io)