

## **Our Privacy Policy**

PLEASE READ THIS POLICY CAREFULLY

Protecting your personal information is very important to Scrintal Labs AB ("Scrintal Labs AB" "our", "us" or "we"). We process all personal data in accordance with the General Data Protection Regulation (EU) 2017/676 ("GDPR") and other applicable data protection rules.

This policy sets out the basis on which any personal data about you will be processed and applies to the processing of personal data in connection with our software-as-a-service transcription platform known as 'Scrintal', app.scrintal.com (the "Tool"). This policy also covers: (i) activities on or through our publicly available website, <http://scrintal.com> ("Website"); and (ii) our direct marketing activities.

Our Website may contain links to third party websites. If you follow a link to any of those third-party websites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for their policies or processing of your personal information. Please check these policies before you submit any personal information to such third-party websites.

### **Data controller**

For the purposes of data protection legislation in the European Union, the data controller (i.e. the person/entity that determines the purposes and manner in which your personal data are processed) is Scrintal Labs AB, a company incorporated and registered in Sweden with the number 559258-1614, operating from Villa Bellona, Universitetsvägen 8 106 91, Stockholm, Sweden.

### **Personal information we may process about you, purposes, legal basis and storage period**

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Our Website operates primarily to market the Tool to individuals and organisations. To the extent we collect personal data via our Website and via our Tool, our main purpose is to better serve our potential customers and to improve the function of the Website and the Tool respectively. A breakdown of the personal data we may process is set out in the table below.

<b>Personal data</b>	<b>Why are personal data processed?</b>	<b>Legal basis for processing</b>	<b>Period for which your data will be stored</b>
The IP address or other unique identifier of the device you used to access our Website.	To improve the function of the Website.	Processing is necessary for our legitimate interests (i.e. to understand who is visiting the Website).	2 years
Website Usage data (e.g. information about how you use our website) and other technical data (e.g. browser type and version, time zone setting and location).	To improve the function of the Website.	Processing is necessary for our legitimate interests (i.e. to understand who is visiting the Website).	2 years
Your first name, last name, email address, postal address and company name.	To enable us to engage in direct marketing (such as newsletters or marketing emails for products and services provided by us that we believe will be of interest to you).	Processing is necessary for our legitimate interests (i.e. direct marketing activities to customers and potential customers).	Until such time as you inform us you do not want to continue receiving marketing communications – you have the right to unsubscribe at any time.
A record of any communication / correspondence you have with us (e.g. when you contact us	To enable us to maintain records with our potential and actual	Processing is necessary to take steps at your request prior to entering into a	For up to 1 year.

by email, telephone or post).	customers.	contract – legal basis performance of contract.	
Any personal data that you provide to us as part of a survey.	To improve our Website or services.	Processing is necessary for our legitimate interests (i.e. to understand the requirements of our potential and actual customers).	For as long as we are using such data to improve our services and for a period of up to 1 year thereafter.
Identity Data, which includes your first name, last name, user ID, company name, job position and company department.	To fulfill the agreement with you concerning your subscription of the Tool.	Performance of contract.	For as long as we have an agreement with you regarding your subscription of the Tool and for a period of 2 years thereafter.
Contact Data, which includes your email address and postal address.	To fulfill the agreement with you concerning your subscription of the Tool.	Performance of contract.	For as long as we have an agreement with you regarding your subscription of the Tool and for a period of 2 years thereafter.
Transaction Data, which includes details about payments to and from you and other details of services you have purchased from us.	To fulfill the agreement with you concerning your subscription of the Tool.	Performance of contract.	For as long as we have an agreement with you regarding your subscription of the Tool and for a period of 2 years thereafter.
Technical Data,	To fulfill the	Performance of	For as long as we

which includes your internet protocol (IP) address, your login data, browser type and version, time zone setting and location you use to access the Tool.	agreement with you concerning your subscription of the Tool.	contract.	have an agreement with you regarding your subscription of the Tool and for a period of 2 years thereafter.
Profile Data, which includes your password, subscriptions purchased by you, your preferences, feedback. and survey responses.	To fulfill the agreement with you concerning your subscription of the Tool.	Performance of contract and legitimate interest.	For as long as we have an agreement with you regarding your subscription of the Tool and for a period of 2 years thereafter.
Tool Usage Data, which includes information about how you use our Tool.	To improve the Tool.	Processing is necessary for our legitimate interests (i.e. to understand the requirements of our customers).	For as long as we have an agreement with you regarding your subscription of the Tool.

Please note that third parties may collect personal data from you directly. For example, payment processors such as Stripe, Inc. collect financial data (such as your payment card details) when you make payment to us on the Tool.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Website Usage Data and Tool Usage Data to calculate the percentage of users accessing a specific feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data, which will only be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your racial or ethnic origin, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and/or offences.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

As regards content data, i.e. any personal data which is contained within the audio or video file that you ask us to transcribe when using the Tool, you as a user of the Tool is the data controller and Scrintal Labs AB is the data processor. Scrintal Labs AB and the person using the Tool enter into a data processing agreement. It shall be noted that also Special Categories of Personal Data may be included in the transcripts and that Scrintal Labs AB may process such data in its capacity as data processor.

### **How personal data are collected**

We may obtain personal data about you in two main ways when you are using our Website and/or Tool:

Direct interactions. You may, for example, provide us with your personal data by filling in forms on our Website. This includes personal data provided to us when an account is created, or you subscribe to use our Tool.

Automated technologies. Personal data may be collected automatically (such as the automatic recognition of your IP address or placement of cookies on your device).

### **Disclosure of your information**

We may disclose your personal information to third parties in the following circumstances:

<b>Purpose of disclosure and third party(s) to</b>	<b>Use justification</b>
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<b>which disclosure might be made</b>	
If you request, we do so	You have provided your consent
If Scrintal Labs AB or substantially all of its assets are acquired by a third party, personal information about our customers will be one of the transferred assets.	Legitimate interests (i.e. to dispose of our business).
If we are under a duty to disclose or share your personal data in order to comply with any legal obligation or to protect the rights, property, or safety of Scrintal Labs AB, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection.	Processing is necessary for compliance with a legal obligation, or processing is necessary in order to protect the vital interests of a natural person.
We may disclose your personal information to third parties, the courts and/or regulators or law enforcement agencies in connection with proceedings or investigations anywhere in the world where we are compelled or believe it is reasonable to do so. Where permitted, we will direct any such request to you or notify you before responding unless to do so would prejudice the prevention or detection of a crime.	Processing is necessary for compliance with a legal obligation, or processing is necessary in order to protect the vital interests of a natural person. Alternatively, legitimate interests (i.e. to cooperate with law enforcement and regulatory authorities).

For analytics and error tracking purposes, may share your IP address or other unique identifier of the device you used to access our Website and Website Usage Data and Tool Usage Data and other technical data (e.g. browser type and version, time zone setting and location) with Google (Google Analytics) or its affiliates. This helps us improve our Website.

We may use third party hosted services such as Google to manage our records of any communication / correspondence you have with us (e.g. when you contact us by email, telephone or post) and any other personal data that you provide to us as part of a survey. We also use Mailchimp in order to provide simpler forms and e-mail communication.

When a third party is processing personal data on behalf of Scrintal Labs AB, a data processing agreement is entered into. Scrintal Labs AB is the data controller and the third party in question is the data processor. The data processor is only permitted to process the personal data in accordance with the instructions of Scrintal Labs AB. Such data processing agreement sets out the subject-matter and duration of the processing, the nature and purpose of the processing, the type of personal data and categories of data subjects and the obligations and rights of the data controller and the data processor.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of an agreement we have with you and you fail to provide that data when requested, we may not be able to perform the agreement or are trying to enter into with you (for example, to provide you with our Tool). In this case, we may have to cancel the service you have with us, but we will notify you if this is the case at the time.

### **Where we store your personal information**

The personal data that we process will be transferred to and stored at a destination outside of the European Economic Area (“EEA”). The data may also be processed by staff operating outside of the EEA who work for us or for one of our business partners or service providers. . Personal data will only be transferred to a country with an adequate level of protection decided by the European Commission. As regards the USA, the European Commission has assessed that the level of protection is adequate if the recipient in the USA adheres to the so called EU-US Privacy Shield regime.

Google LLC, Intercom Inc. and Mailchimp Inc. or their affiliates may store and process this data in the USA. To ensure that these transfers are lawful, we rely on the fact that each entity is certified as complying with the EU-US Privacy Shield regime. In the event they are not certified by the EU-US Privacy Shield regime, we will ensure that another lawful mechanism exists. As regards content data, i.e. any personal data which is contained within the audio or video file that you ask us to transcribe when using the Tool, and where you as a user of the Tool is the data controller and Scrintal Labs AB is the data processor, such data is stored within the EEA.

### **Your rights**

Under the GDPR, you have various rights in relation to your personal data. All of these rights can be exercised by contacting us at [support@scrintal.com](mailto:support@scrintal.com), at our address mentioned above.

You have the following rights in relation to your personal data:

<b>Rights</b>	<b>Details</b>
Right of Information and Access	You have the right to obtain from us confirmation as to whether your personal data are being processed, and, where that is the case, access to such personal data.
Right to Rectification	We will use reasonable endeavors to ensure that your personal information is accurate. In order to assist us with this, you should notify us of any changes to the personal information that you have provided to us by sending us a request to rectify your personal data where you believe the personal data we have is inaccurate or incomplete.
Right to erasure / 'Right to be forgotten'	Asking us to delete all of your personal data will result in us deleting your personal data without undue delay (unless there is a legitimate and legal reason why we are unable to delete certain of your personal data, in which case we will inform you of this in writing).
Right to restriction of processing	You have the right to ask us to restrict processing your personal data at any time.
Right to object	You have the right to object at any time to processing of your personal data when the processing is based on legitimate interest (unless we demonstrate 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 have the right to object at any time to such processing.
Right to data portability	You have the right to request that we provide you with a copy of all of your personal data and to transmit your personal data to another data



	controller in a structured, commonly used and machine-readable format, where it is technically feasible for us to do so.
Right to complain	You have the right to lodge a complaint to a supervisory authority. Although we encourage our customers to engage with us in the event they have any concerns or complaints.

We will not ordinarily charge you in respect of any requests we receive to exercise any of your rights detailed above; however, if you make excessive, repetitive or manifestly unfounded requests, we may charge you an administration fee in order to process such requests or refuse to act on such requests. Where we are required to provide a copy of the personal data undergoing processing this will be free of charge; however, any further copies requested may be subject to reasonable fees based on administrative costs.

Where you request us to rectify or erase your personal data or restrict any processing of such personal data, we may notify third parties to whom such personal data has been disclosed of such request. However, such third party may have the right to retain and continue to process such personal data in its own right, for example to comply with its legal obligations.

### **Amendments of this policy**

Any changes we make to our privacy policy in the future will be posted on the Website and, where appropriate, we will notify you, by email. We will publish the updated version of the privacy policy on our Website. Your continued use of the Tool will be deemed acceptance by you of the privacy policy. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you and for periodically visiting this privacy policy to check for any changes.

### **How to opt-out**

If you wish to opt out from any communication, clear, enable or disable cookies or tracking we have collected the most important information on how to do so below.

Select a browser below to see detailed explanation of how to remove or disable cookies.

[Manage cookies on Safari](#)

[Manage cookies on iOS](#)

[Manage cookies on Chrome](#)

[Manage cookies on Firefox](#)

[Manage cookies on Internet Explorer](#)

### **How to manage and reject Google Analytics site tracking**

You can opt out of all Google Analytics site tracking, including any other sites that use Google Analytics via [this link](#). You can learn more about Google Analytics and how your data is safeguarded via [this link](#).

### **How the personal data is protected**

We use IT systems to protect the secrecy, integrity and access to personal data. We have taken specific security measures to protect the personal data against unauthorized processing (such as unauthorized access, loss, destruction or damage). Only the persons who need to process the personal data so that we can fulfill our above-mentioned purposes have access to them.

Questions, comments and requests regarding this privacy policy are welcome and should be addressed to [support@scrintal.com](mailto:support@scrintal.com).