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Privacy Notice - Website Visitors

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1. Background, purpose, and responsibility

Elypta AB, reg.no. 559112-1214, (“Elypta”, “us”, “we” or “our”) is committed to protecting and respecting your privacy. Our mission is that you feel comfortable with us processing your personal data.

This privacy notice (“Privacy Notice”) applies to personal data collected from visitors to our website (“visitors”, “you”, “your”, “their”, “they”), www.elypta.com, (“Website”) and explains how we ensure that your personal data is processed in compliance with applicable legislation.

The Elypta Privacy Manager is responsible for this document and process, and will be reflected in the document either as an issuer or approver of the document. Legal counsel shall be consulted.

2. Data Controller and Privacy Manager

Elypta is the data controller for the processing of Website Visitors’ personal data and is thus responsible for ensuring that the processing of personal data complies with applicable data protection legislation. If a Visitor has any questions regarding the processing of their personal data, they will find Elypta’s contact details at the end of this Privacy Notice.

Elypta is not legally required to designate a Data Protection Officer (“DPO”). Instead, Elypta appoints a Privacy Manager who is inter alia responsible for monitoring that Elypta’s processing of personal data is carried out in accordance with applicable legislation.

The Privacy Manager can be reached via the contact details at the end of this Privacy Notice.

3. Our Processing of Your Data

We use your personal data for the following purposes:

- Providing, administrating, and maintaining Elypta’s Website;
- Marketing, including direct marketing;
- Business development; and
- Administration in connection with acquisitions, restructuring, etc.

More information about our processing of personal data is provided in the tables below , including information about why we process your personal data, what personal data we process to achieve those purposes, and for how long we retain your personal data for each specified purpose.

3.1 Providing, administrating, and maintaining Elypta’s Website

We process your personal data to provide, administer and maintain our Website. We also process your personal data in order to provide you with good service, for example if you choose to contact us. For visitor analytics purposes, we use a third party non-cookie dependent analytics service that collect aggregated data about visitors to our websites.

Categories of personal data:	Legal basis:	Retention period:
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<p><u>Contact details</u> such as name, telephone number and e-mail address.</p> <p><u>User data</u> such as behavioural patterns and browsing habits, for example, which pages you have visited on our website and the duration of the visit.</p> <p><u>Device data</u> such as IP number.</p> <p><u>Other information</u> that you choose to share with us.</p>	<p><u>Legitimate interest</u>, as we assess that our interest in providing, administrating, and maintaining our Website outweighs your interests or fundamental rights and freedoms requiring protection of personal data.</p>	<p>The personal data is retained for 10 years as they are needed to provide, administer and maintain our Website. If you contact us with, for example, a question about our Services, we process your personal data throughout the duration of your matter and up to 2 months after.</p>
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3.2 Marketing

We process your personal data for marketing purposes. Our marketing measures may consist of sending newsletters and other information, as well as through social media.

Categories of personal data:	Legal basis:	Retention period:
<p><u>Contact details</u> such as name, telephone number and e-mail address.</p> <p><u>User data</u> such as behavioural patterns and browsing habits, for example which pages you have visited on our website and the duration of the visit.</p> <p><u>Device data</u> such as IP number.</p> <p><u>Information originating from your social media accounts</u> such as profile picture, user name and other information that you choose to share when you interact with us through social media.</p>	<p><u>Legitimate interest</u>, as we assess that our interest in sending marketing to you outweighs your interests or fundamental rights and freedoms requiring protection of personal data.</p>	<p>The personal data is retained during a period of 10 years from the date we collected your data, alternatively from the date when you were last in contact with us, depending on which of the alternatives that occurred later.</p>

3.3 Business Development

We process your personal data to analyse, improve and develop our Website.

We use a third-party tool in order to collect aggregated data about the visitors on our Website.

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Categories of personal data:	Legal basis:	Retention period:
<p><u>User data</u> such as behavioural patterns and browsing habits, for example which pages you have visited on our (and others') website and the duration of the visit.</p> <p><u>Location data</u> such as information about your location when you visit our Website.</p> <p><u>Device data</u> such as IP number.</p> <p><u>Other information</u> that you choose to share with us (for example when you leave a customer review).</p> <p><u>Information originating from your social media accounts</u> such as profile picture, user name and other information that you choose to share when you interact with us at social media.</p>	<p><u>Legitimate interest</u>, as we assess that our interest in developing our Website outweighs your interests or fundamental rights and freedoms requiring protection of personal data.</p>	<p>The personal data is retained for as long as it takes to analyse, improve, and develop our Website. We process your personal data up to 10 years after gaining access to your data.</p>

3.4 Administration in connection with mergers and acquisitions, restricting etc.

If Elypta is to be restructured, e.g. divided into several different businesses, or if a third party acquires Elypta or a part of it such as our customer database, Elypta will disclose your personal data and that of other customers to the acquiring company. The acquiring company will continue to use your personal information for the same purposes as those stated in this Privacy Notice, unless you are informed otherwise in connection with the disclosure.

Categories of personal data:	Legal basis:	Retention period:
<p><u>Contact details</u> such as name, telephone number and e-mail address</p> <p><u>User data</u> such as behavioural patterns and browsing habits, for example which pages you have visited on our (and others') website and the duration of the visit.</p> <p><u>Location data</u> such as information about your</p>	<p><u>Legitimate interest</u>, as we assess that our interest in enabling an acquisition or restructuring process, assuming that the acquiring company carries out similar operations as Elypta, outweighs your interests or fundamental rights and</p>	<p>If Elypta ceases to exist, e.g. through a merger, liquidation or bankruptcy, or if Elypta's customer database is transferred to an acquiring company, we will erase the personal data as long as the retention of such personal data is not required by law. In such case your personal data will be</p>

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<p>location when you visit our Website.</p> <p><u>Device data</u> such as IP number.</p> <p><u>Other information</u> that you choose to share with us (for example when you leave a customer review).</p> <p><u>Information originating from your social media accounts</u> such as profile picture, user name and other information that you choose to share when you interact with us at social media.</p>	<p>freedoms requiring protection of personal data.</p>	<p>processed in accordance with this Privacy Notice.</p>
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4. From Where do We Collect Your Data

We receive the personal data we process from different sources. In addition to the personal data which you provide us with, we also collect aggregated personal data through our use of analytics services such as Plausible. For more information on how we use cookies to collect your data, please see Section 11 below.

It is necessary that you provide certain personal data to us at Elypta in order to enter into an agreement with us and for us to provide our products and services to you. In case you do not provide us with the necessary personal data, it is not possible for us to provide our products or services to you and thus enter into an agreement with you.

5. Automated Decision-Making, Including Profiling

We do not use processes for automatic decision-making. In the visitor analytics service we provide an anonymous profile is made to broadly classify visitors, but these do not rely on the use of cookies or user tracking.

6. Retention of Personal Data

We will only retain your personal data for as long as it is needed for the purposes we collected the personal data and as described in this Privacy Notice. When we no longer need your personal data we will remove the personal data from our systems and databases, including any back-ups. More specific retention periods are provided in the tables above under the heading “Retention period”.

7. With Whom Do We Share Your Personal Data

We may share personal data with third parties that are trusted recipients. Such sharing is based on our business relationship with the third parties, your consent, or legal or contractual obligations. We strive to ensure that your personal data is always processed in accordance with this Privacy Notice.

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With whom we may share your personal and the categories of personal data shared are specified below:

We may share your personal data with:	Categories of personal data:
Providers of third party analytics services, such as Plausible, and website host service such as Webflow	<p><u>Contact details</u> such as name, telephone number and e-mail address</p> <p><u>User data</u> such as behavioural patterns and browsing habits, for example which pages you have visited on our (and others') website and the duration of the visit.</p> <p><u>Location data</u> such as information about your location when you visit our Website.</p> <p><u>Device data</u> such as IP number.</p> <p><u>Other information</u> that you choose to share with us (for example when you leave a customer review).</p>

We may also in certain cases be required to share your personal data with public authorities or other third parties in connection with audits, court proceedings or similar reasons.

We will not sell your personal data to any third party.

8. Where Do We Process Your Personal Data

Elypta aim at processing your personal data within EU/EEA. In some cases, we transfer your personal data to countries outside of the EU/EEA. When personal data is transferred outside of the EU/EEA, we have taken measures to ensure that your personal data is protected and that the transfer is carried out in accordance with applicable law. More specifically, when carrying out any transfer to a country that lacks an adequacy decision by the European Commission, we will use the European Commission's Standard Contractual Clauses as legal basis for the transfer. In addition, we ensure, and also expect our data processors to ensure, as required by legislation, that your personal data remain protected regardless of whether they are transferred outside the EU/EEA.

The countries outside of the EU/EEA to which Elypta transfer your personal data and the legal basis for the transfer are specified in the table below.

Country outside of the EU/EEA:	Legal basis for the transfer:
USA (website hosting service)	Standard Contractual Clauses

For more information on the legal basis for a specific transfer or to request a copy of the relevant documentation regarding the safeguards taken for the transfer, please contact us through our contact information stated in section 13 below.

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9. Your Rights

9.1 Our responsibility for your rights

Elypta is in its capacity of data controller responsible for ensuring that you can exercise your rights and that your personal data is processed in accordance with applicable law. You may at any time contact us to exercise your rights. You will find our contact details in section 13 below.

Elypta is responsible for responding to your request to exercise your rights within one month from our receipt of your request. We are entitled to extend this period by two months when necessary, taking into account the complexity of your request or if we have received a large number of requests. We will inform you of any such extension within one month of receipt of your request, together with the reasons for the delay and information about your right to lodge a complaint with a supervisory authority.

All information and communication, and all actions we carry out, is at no cost for you. If the action you request is manifestly unfounded or excessive, we are entitled to charge you an administrative fee to provide you with the requested information or carry out the requested action or refuse to meet your request.

9.2 Your right to access, rectification, erasure and restriction of processing

You have right to request:

- a) Access to your personal data. This means that you have the right to request information on our use of your personal data. You also have the right to request a copy of the personal data being processed by us, at no cost. However, we have the right to charge a reasonable administration fee if you request further copies. If you make a request by electronic means, e.g. via email, we will provide you with the information in commonly used electronic format.
- b) Rectification of your personal data. We will at your request, or at our own initiative, rectify, anonymise, erase or complement personal data that you or we discover is inaccurate, incomplete or misleading. You also have the right to complete the personal data with additional data if relevant information is missing.
- c) Erasure of your personal data. You have the right to request that we erase your personal data if we no longer have an acceptable reason for processing the data. Such acceptable reasons for processing the data are if the processing is necessary:
 - i. for the right of freedom of expression and information;
 - ii. in order for us to comply with a legal obligation;
 - iii. for reasons of public interests in the area of public health;
 - iv. for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes; or
 - v. for the establishment, exercise or defense of legal claims.

Given this, erasure shall be made by us if none of the above applies and if:

- i. the personal data is no longer necessary for the purposes for which it was collected;

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- ii. we process your personal data based on your consent, and you withdraw your consent;
- iii. you object to the processing of your personal data based on our legitimate interest and there is no overriding legitimate ground for the processing;
- iv. we have processed the personal data unlawfully;
- v. we are required to erase the personal data due to a legal obligation; or
- vi. you are a child and we have collected your personal data in relation to the offer of information society services.

However, there might be requirements under applicable law, or other compelling reasons, that prevents us from immediately erasing your personal data. In such case, we will stop using your personal data for any other reasons than to comply with the applicable law, or the relevant compelling reason.

- d) Right to restrict processing. This means that we temporarily restrict the processing of your personal data and that we must inform you before the restriction of processing is lifted. You have the right to request restriction of the processing when:
- i. you have requested rectification of your personal data in accordance with section 9.2 b) above, during the period of time we are verifying the accuracy of the data;
 - ii. the processing is unlawful and you do not want the personal data to be erased;
 - iii. Elypta, in its capacity as data controller, does no longer need the personal data for the purposes for which it was collected, but you require us to retain the information for the establishment, exercise or defense of a legal claim; or
 - iv. you have objected to our legitimate interest for the processing in accordance with section 9.3 below, during the time we determine whether our legitimate interest overrides your privacy rights.

At Elypta, we will take all reasonable and possible actions to notify any recipients of your personal data regarding any rectification, erasure or restrictions carried out by us in accordance with this section 9.2. At your request, we will also inform you of which third parties we have shared your personal data with.

9.3 Your right to object to the processing

You have the right to object to the processing of your personal data when such processing is made with a legitimate interest as the legal basis (please see section 3 above). If you object to such processing, we will only continue with the processing if we have a compelling legitimate reason for the processing that outweighs your interests, rights or freedoms, or if continued processing is necessary for the establishment, exercise or defense of a legal claim.

You always have the right to object to the processing of personal data when such processing is made for direct marketing purposes. If you object to such processing, we will no longer process the personal data for such purposes.

9.4 Your right to withdraw your consent

If we process your personal data based on your consent as the legal basis, you always have the right to withdraw your consent. You can do this at any time by contacting us. Our contact details are found in the end of this Privacy Notice.

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9.5 Your right to data portability

You have right to data portability when we process your personal data on the basis of consent or performance of contract and when the processing is carried out by automated means.

The right to data portability entails that you have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format. You also have the right to directly transmit those data from us to another controller, when technically feasible. The right to data portability entails in practice that you for example have the right to receive and transfer the personal data you have given to us when you created a user account on our Webpage.

9.6 Your right to lodge a complaint with the supervisory authority

You have the right to lodge a complaint with the Swedish Authority for Privacy Protection (Sw. Integritetsskyddsmyndigheten, IMY) if you are not satisfied with our processing of your personal data. Please find the contact details down below:

E-mail: imy@imy.se

Website: www.imy.se

10. We Protect Your Personal Data

We want you to feel safe when providing us with your personal data. Therefore, Elypta has implemented appropriate security measures to protect your personal data against unauthorized access, alteration and erasure. In the case of a security breach that may significantly affect you or your personal data, e.g. when there is a risk of fraud or identity theft, we will contact you and inform you of what you can do to reduce the risk.

11. Cookies

We do not use cookies or similar technologies (“cookies”) on our website. For more information, see Ref 1.

12. Amendments To This Privacy Notice

Elypta has the right to amend this Privacy Notice at any time. The latest version will always be available on our webpage www.elypta.com.

Elypta will inform you of any changes to the Privacy Notice with reasonable prior notice. If you do not consent to these changes, you have the right to object to the processing before the changed Privacy Notice enters into effect.

13. Contact Information

Do not hesitate to contact us at Elypta if you have any questions regarding this Privacy Notice, our processing of your personal data, or if you want to exercise your rights.

E-mail: dpo@elypta.com

Webpage: www.elypta.com

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Address: Nanna Svartz Väg 4, 171 65 Solna, Sweden

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Data Subject Access Request Form

We have received your request of data subject access, meaning that you wish to receive information of what personal data we process about you and relevant information related to our processing of your personal data.

As a data subject, you have the right of access, meaning that you can request to receive information or access to the personal data we process about you. This is known as a data subject access request. If you wish to make a data subject access request, please complete this form and return it to us by post or e-mail, since we need to be able to identify your identity and request. If sending by post, please use the following address:

Elypta AB, Nanna Svartz väg 4, 171 65 Solna, Sweden, dpo@elypta.com

1. Data Subject's Full Name: _____

2. Data Subject's Telephone Number and/or Email (if questions arise during the processing of your request): _____

3. Details of the Personal Data Requested: _____

4. Is the information going to be sent to the data subject or his/her representative?

To the data subject To the representative

If the data shall be sent to the representative, sections 6 and 7 need to be filled out.

5. I confirm that I am the Data Subject specified above.

Signature: _____

Print Name: _____

Date: _____

6. The data subject (whose data is being requested) must give written authorization for the information to be released to his/her authorized representative.

I hereby give my authorization for _____

(fill out the name of the authorized representative) to request access to my personal data.

Signature of the Data Subject: _____

Print name: _____

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7. (To be filled out by the representative of the data subject) I confirm that I am the authorized representative of the Data Subject.

Name of the authorized representative and the address where the response containing the personal data is to be sent: _____

Signature: _____

Print Name: _____

Date: _____

Elypta will process your data subject access request without undue delay and in any event within one (1) month of receipt of the request. If an extension of time is needed due to the complexity and number of the requests, we will contact you within that timeframe.

If you have any queries whilst your request is being processed, please do not hesitate to contact us via the email or postal address mentioned above.