

INTEGRITY POLICY

This integrity policy describes how GADD Software AB reg.no 556867-0854 (“**GADD Software**”) processes your personal data. With the terms “we”, “our” and “us” in this policy are meant GADD Software. We safeguard your privacy and will at all times ensure that your personal data is processed in a lawful manner.

1 WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?

GADD Software is data controller for your personal data and is responsible for ensuring that the processing is conducted in accordance with applicable data protection regulations.

2 WHOM DO WE PROCESS PERSONAL DATA ABOUT?

We process personal data regarding the following categories of persons:

- *Visitors*, i.e. private persons who visit and use our website.
- *Marketing recipients*; i.e. private persons who have registered to receive our newsletter or other information, or who we collect information about through our social media.
- *Customers, suppliers and partners*, i.e. private persons who are representatives for our suppliers or private persons who represent our existing or future customers/partners.

3 WHAT PERSONAL DATA DO WE PROCESS ABOUT YOU?

We may treat both information that you submit to us and which we collect from you.

3.1 If you are a visitor

We process the following personal data about you as a visitor:

- IP-number and information about your use of GADD Software’s website.

3.2 If you are a marketing recipient

We process the following personal data about you as a marketing recipient:

- Contact information, such as name, address, email address and profile on social media, and
- IP-number and information about your use of GADD Software’s website.

3.3 **If you are a customer/partner or supplier**

We process the following personal data, regarding you as a customer, partner or supplier, or representative of such:

- Contact information, such as name, address, email address and phone number,
- IP-number and information about your use of GADD Software's website,

We may in specific situations process the following personal data, regarding you as a customer, partner or supplier, or representative of such:

- Copy of ID card/driver's license, and
- Payment data and information that reveals after a credit report.

4 **WHY AND ON WHAT LEGAL BASIS ARE WE PROCESSING YOUR DATA?**

4.1 In order to conclude and manage agreements with you as a customer, partner or supplier, or a representative of such, we collect and process your personal data. The legal basis for our processing of your personal data is that it is necessary in order to fulfil our agreement with you or to take action before entering into such agreement. If you do not provide the above-mentioned personal data, we cannot offer our products and services or otherwise fulfil our commitments to you.

4.2 If you are a representative or contact person for an organization that is a customer, partner or supplier, the legal basis for our processing of personal data is a balance of interest, i.e. the processing is necessary for a purpose that concerns our legitimate interests in maintaining and fulfilling our contractual commitments. If you do not provide the above-mentioned personal data, we may not be able to fulfil our commitments to the organisation of which you are a representative.

4.3 We collect and process personal data belonging to you as a visitor, marketing recipient, customer, partner or supplier in order to assure the quality of our business, to contact you and/or to offer and promote our products or services to you. We may also send relevant offers to you in the form of, among other, newsletters, promotional offers through email etc. The legal basis is that such processing is necessary for our legitimate interest in being able to develop our business and meet your needs as well as promote products and services that we believe you may be interested in. Our interest of processing personal data for these purposes go beyond your potential interest of protecting your personal integrity, in light of the potential benefits that the marketing brings to you. However, you are entitled to object to the processing of your personal data for the purpose of direct marketing at any time.

4.4 Some personal data may be processed due to GADD Software being required to fulfil certain legal obligations, such as personal data processed as a result of our accounting obligation or other obligations stated in law.

5 FOR HOW LONG IS YOUR PERSONAL DATA BEING STORED?

- 5.1 GADD Software does not save personal data longer than necessary in relation to the purpose for which the data is being processed. Therefore, we perform screenings of the personal data on a regular basis and remove data which is no longer necessary to process.
- 5.2 We save data about you as a customer, partner or supplier for as long as there is an active agreement. After the contractual relationship has ended, we save personal data for as long as a legal claim related to the agreement is or may be enforced. However, we may need to store personal data even after this time period, e.g. in order to manage warranties, insurance or deadlines for complaints, comply with legal requirements, handle other legal requirements that may be directed against GADD Software and which do not derive from any agreement or to promote products or services and send offers that we believe you might be interested in.
- 5.3 We save data about you as a marketing recipient until you object to the processing of your personal data. If you object to the processing, we will delete your personal data as soon as possible.
- 5.4 We save data about you as a visitor up until you object to the processing of your personal data or for up to 24 months after your last visit to the website. If you object to the processing, we will delete your personal data as soon as possible.

6 WHO HAS ACCESS TO YOUR PERSONAL DATA?

Your personal data may be submitted to and processed by third parties. These may include group companies, service providers, legal advisors, accountants, business consultants, authorities etc. Examples of situations when your personal data may be transferred to third parties are when such action is required due to law, disputes, authority requests or decisions or after a request by you, alternatively when so is required in order to fulfil GADD Software's legitimate interest. GADD Software remains personal data controller for the personal data provided to the third parties, while the third parties, depending on the circumstances, become independent personal data controllers, personal data controllers joint with GADD Software or personal data processor to GADD Software.

7 HOW AND WHERE DO WE STORE YOUR PERSONAL DATA?

- 7.1 GADD Software takes appropriate technical and organizational measures to prevent unauthorized or unlawful processing and access, loss, destruction or damage to personal data, thereby ensuring an appropriate level of security.
- 7.2 GADD Software may process personal data within as well as outside of the EU/EEA. We will and must take necessary actions in order to ensure that the transfer of personal data is conducted lawfully and that the personal data will continue to be protected by the recipients outside of the EU/EEA.

8 COOKIES

- 8.1 When you visit our website, we use cookies. Cookies are small text files that are saved in your device when visiting a website. These cookies help us improve your user experience on our website and help us find out which pages you are interested in. Some of these cookies are necessary for functionality, while others are used to optimize and enhance your experience.
- 8.2 We use cookies to collect data and for example compile the number of visitors, which links visitors click on, demographics and interest in order to optimize our website and provide you with a better experience while on the website.
- 8.3 We use Google Analytics to identify the preferences of the visitors of our website and which areas of our website that are particularly popular. This allows us to tailor the content of our website to your needs, interests and preferences and to improve our offer to you.
- 8.4 We also use third party cookies, which conduct cross-domain tracking in order for us to provide marketing to you on other websites or media channels.
- 8.5 You may block cookies and still have access to most of our content on the website. If you choose to block cookies, however, it may impair the website's functionality. To block cookies, you must change the security settings in your browser.

9 PROFILING

GADD Software may process your personal data through profiling, such as analysis of how you use our website, which services and offers you have been interested in, details of your purchases etc. to provide you with offers that we think may interest you. You may at any time object to the processing of your personal data through profiling. However, if such treatment is necessary for the conclusion or performance of an agreement with you or if such treatment is permitted under applicable law, we may still continue with the processing.

10 WHAT RIGHTS DO YOU HAVE AS A DATA SUBJECT?

- 10.1 **The right to access** – You have the right to turn to us and request access to the personal data we process related to you. You also have the right to request information about, among other things, the purpose of the processing and the recipients of the data. GADD Software will provide you with a copy regarding the processed personal data, free of charge. If you request further copies, we may charge an administration fee.
- 10.2 **The right to rectification and limitation** – You have the right to, without undue delay, have your personal data rectified or, under certain circumstances, limited. If you believe that GADD Software is processing personal data regarding you which is inaccurate or incomplete, you may request to have the data rectified or completed.

- 10.3 **The right to deletion** – You also have the right to have your personal data deleted, e.g. if the data is no longer necessary for the purpose of the processing or if the processing is based on a consent which has been withdrawn. However, there may still be legal requirements or contractual relations preventing us from deleting your personal data.
- 10.4 **The right to objection** – You have the right, at any moment, to object to the processing of your personal data if the legal basis of processing is based on a balance of interests. You also have the right, at any moment, to object to the processing of your personal data if the data is processed for the purpose of direct marketing.
- 10.5 **The right to data portability** – You have the right to receive the personal data that you have provided to GADD Software and have this data transmitted to another data controller (data portability), provided that such portability is technically possible, and that the legal basis for processing the data is consent or that it has been necessary for the fulfilment of an agreement.
- 10.6 **The right to file a complaint** – If you are dissatisfied with how we process your personal data, please contact us by using our contact information stated below in section 12. You also have the right to file a complaint regarding our personal data processing to:

Integritetsskyddsmyndigheten, Box 8114, 104 20 Stockholm
imy@imy.se

11 ALTERATIONS OF THE POLICY

GADD Software reserves the right to alter and update the policy. If the policy is materially altered or if current data is to be processed in a different manner than what is stated in the policy, GADD Software will inform about this appropriately.

12 CONTACT

For questions about the policy or requests regarding personal data, please contact GADD Software contact person by using our contact information below.

Contact information

Name: Mats Carlberg, Security & Support Manager GADD Software
Email address: mats@gaddsoftware.com