

Privacy Policy

We at Exparang AB (“**Exparang**”, “**we**” or “**us**”) is committed to protecting and respecting your privacy. This privacy policy describes your rights and how we collect and use personal data about our potential, current and former customers, suppliers and business partners.

Exparang AB is responsible for the processing of your personal data as described herein, as a data controller. Please do not hesitate to reach out to us if you have any questions or comments regarding your personal data or this privacy policy. You can reach us by sending an email to info@exparang.com.

In some cases, where we process data on behalf of you or your employer as a data processor, 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. Such processing activities are not included in this privacy policy since this policy only describes the processing we do as a data controller.

1 **PERSONAL DATA THAT WE PROCESS, HOW WE DO IT AND OUR LEGAL GROUNDS FOR PROCESSING IT**

We process your personal data for the following purposes and based on the following legal basis:

- **To communicate with you.** Your contact details (name, email address and phone number) as well as the information contained within your communications with us, such as the contents of emails. This processing can either be necessary for the performance of our contract with you or your employer or for our legitimate interest in effective communication with our customers, suppliers and business partners.
- **To market our services.** Your contact information will be used to send newsletters, information about our services or events to you. This processing is based on our legitimate interest of being able to market our services, as you have shown an interest in our services. Feel free to follow the unsubscribe instructions contained in the email received from us or contact us directly if you no longer want direct marketing from us.
- **In order to identify you and the company you are working for.** If you are a sole trader, we will process your personal identification number as a part of the information we keep about your company and to identify you as the representative of such a company. Since your personal identification number is the same as your company registration number this is necessary for the identification process. If you are not a sole trader but contacts us in the role of representative of a company, we process your company name, job title, workplace and sometimes information regarding your right to represent your company. Such processing is done for our legitimate interest of being able to identify our customers, suppliers and business partners.

- **To fulfil our legal obligations.** We are obligated 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 information about you 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. Examples of personal data processed for this purpose is storage of communication with us, as well as invoices and agreements.
- **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.
- **To ensure the functionality of our website.** We will collect technical data from your computer (or mobile device) in connection with your use of our website. Examples of this information is your IP address, browser type and version, screen resolution, preferred language, geographic location, operating system and computer. This processing is necessary to ensure our legitimate interest in guaranteeing the functionality of our website, or with your consent if the purpose is not deemed as strictly necessary. Please view our cookie policy on our website for further information.
- **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 or ask you to perform a survey.
- **Only applicable to our customers:**
 - **To provide our services to you.** If you are customer to us, we will process your personal data to manage our customer relationship and to provide you with our services. This is necessary for upholding our obligations according to the contract we have entered into with you or your employer.
 - **To develop and improve our service.** We use technical data, and other aggregated and non-personal information to develop and improve our platform, 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 our platform). For example, we may collect and evaluate technical data about your use of our platform for analytical purposes, to understand how people use the platform in order to make it more intuitive. This

processing is partly necessary to provide our service to you but mainly to pursue legitimate interests of improving our service and platform and its features.

- **To administer our agreements.** If you are a customer to us, personal data will be processed when we enter into and during the agreements with you or your employer. This is necessary for us to be able to enter into and fulfil the obligations of the agreement with you or your employer and for our legitimate interest to administrate the agreement, e.g. to be able to send invoices with you as reference or to have a contact person in connection with the.
- **Concerning sensitive data.** We will not ask you to provide us with sensitive personal data about you. If you chose to include such information in the communication with us, we will only process such information to the extent necessary and justified. Be careful about sending sensitive data through non-encrypted email since email communications are not always secure.

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 create an account on our platform or otherwise in your communication with us. 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 performing the services you expect from us.

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

When you visit our website, we will collect technical data regarding your device from cookies and similar technologies. For more information on cookies view our cookie policy on our website.

3 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 suppliers who help us to provide our service to you, which require them to process personal data. Such suppliers may be cloud-based CRM-systems or servers.

We provide personal data to third parties solely for the purpose of delivering our services and to manage our daily operations including marketing of our services. Our suppliers and 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.

- **Users of our platform.** The purpose of our platform is to connect job seeking professionals with companies. To be able to do so we will share the information you choose to provide in your profile with professionals that you are interested in.
- **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.
- **Merger, acquisition or other business transfer.** We may share or transfer your personal data in connection with any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

4 **WHERE WE PROCESS YOUR PERSONAL DATA**

We always strive 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 located in a country which the EU Commission has deemed as having adequate privacy protection including, if the company is located in the United States, abides by the Privacy Shield.

You can always contact us for further information about the applicable safeguards.

5 **HOW LONG WE KEEP YOUR PERSONAL DATA**

We keep your personal data only 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 applicable legislation into account.

We only store data if and to the extent we believe it is necessary to protect our legal rights, legitimate interests and the interests of others. For example, your data will be stored for a longer period if required by applicable statutory retention periods, such as applicable periods for claims and accounting rules – however it will then only be retained for such purpose.

6 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, 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 *Integritetsskyddsmyndigheten*, which also is our lead supervisory authority, and you can find more information at their website:

<https://www.imy.se/>

Please note that legal rights or obligations (such as confidentiality, accounting and tax legislation), investigations of security incidents, enforcement of our terms and conditions may prevent us from disclosing or transfer all or part of your information, or from immediately deleting your information. The same applies if you have requested to “unsubscribe” from further messages from us, as we will keep information of the request to ensure that we will fulfil it.

7 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 email or on our website), but we also recommend that you review this privacy policy from time to time to ensure you are aware of any amendments.