

## **Privacy Policy**

At ProOpti we believe that personal data always should be processed with respect and consideration – and in a secure manner. Therefore, the protection of your data, including your personal data, is of the highest priority to us.

This website also uses cookies, please refer to Cookie Policy for more information.

### What is personal data and processing of it?

Personal data are all kind of information that can be directly or indirectly attributed to a living, physical person. Processing of personal data is all that happens with personal data, such as collection, storage, structuring, alteration, retrieval, use, transmission and erasure.

# Who is the personal data controller?

Personal data controller for the ProOpti group's processing of personal data is: ProOpti AB, corporate identity number 556475-1567, located at Linnégatan 89 A in Stockholm (postal address: ProOpti AB, P.O. Box 24169, 104 51 Stockholm).

# What personal data might we collect about you and how will we process it?

If you are interested in additional information about our product and services, you can download information such as whitepapers, attend webinars or sign up for physical events. In order to administer this, we need information about you. We also use the contact information you provide us with to contact you with information and inspiration about our services. We process this data based on our legitimate interest to market our product and services. However, there might be national marketing legislation requiring us to ask for your consent to direct marketing.

You always have the right to object to us processing your data for the purpose of direct marketing. If you receive an automatic email from us, you can unsubscribe from receiving future emails by using the unsubscribe instructions at the bottom of each email, or you can contact us using privacy@proopti.com.

Each form on our website where you can enter personal information contains a brief description of how we use the information. If you want to know more about the processing of your data, you can read about different scenarios below.



Scenario	When you register on our website, as a customer or partner to us.
Processing	Since your company has an active customer or partner relationship with us we process your data to be able to respond to your service requests and support needs.
	To contact you via email, telephone or post, with information about our services that we believe you might be interested in.
	To send important messages, such as communication about changes in our terms and policies.
Categories of personal data	Your name, professional contact information (your work e-mail address, mailing address, and phone number, company, city, country) and your professional role.
Legal basis	Processing is necessary for the performance of a contract to which your organization is party as well as for the purposes of legitimate interests pursued by ProOpti.
	To fulfill our obligations related to the agreement, such as deliver services, provide support and administer the agreement, we need to have contact information to a number of roles within the organization, which might include your professional role and contact information at that organization.
Storage period	We store customer and partner data for as long as there is an agreement between your organization and ProOpti, and thereafter for a period of 24 months in order to have contact information for billing and other issues related to terminating the services and the agreement. Should you as an individual end your employment at that organization you can request to be deleted earlier.
Scenario	When you choose to download occasional information such as a whitepaper.
Processing	To provide you with requested information.
	To contact you via email, telephone or post with information about our services that we believe you might be interested in, based on what service you have chosen, looked at and shown interest in.
Categories of personal data	Your name, professional contact information (your work e-mail address, mailing address, and phone number, company, city, country) and your professional role.
Legal basis	Processing for the purpose of legitimate interest for ProOpti to market and sell product and services, since the personal data collected is limited and related to your professional role.
Storage period	As the sales cycle for our solutions is long, on average 8-12 months, we keep your data up to 18 months after your last activity.
Scenario	When you sign up for a live webinar or physical event.
Processing	To provide you with participation links or event address and other information related to the event.
	To contact you via email, telephone or post with information about our services that we believe you might be interested in, based on what service you have chosen, looked at and shown interest in.



Categories of personal data	Your name, professional contact information (your work e-mail address, mailing address, and phone number, company, city, country) and your professional role.
	When signing up for a physical event we might ask for any food preferences.
Legal basis	Processing is necessary for you to be able to attend the event.
	Processing for the purpose of legitimate interest for ProOpti to market and sell product and services, since the personal data collected is limited and related to your professional role.
Storage period	As the sales cycle for our solution is long, on average 8-12 months, we keep your data up to 18 months after your last activity. Information on food preferences will be deleted straight after the event.
Scenario	Registration of existing customer and partner contacts in our CRM and billing systems.
Processing	Since your company has an active customer or partner relationship with us we process your data to be able to administer the agreement, deliver the ordered service, and respond to your organization's service requests and support needs. To contact you via email, telephone or post, with information about our services that we believe you might be interested in. To send important messages, such as communication about changes in our terms and policies.
Categories of personal data	Your name, professional contact information (your work e-mail address, mailing address, and phone number, company, city, country) and your professional role.
Legal basis	Processing is necessary for the performance of a contract to which your organization is party as well as for the purpose of legitimate interest pursued by ProOpti. In order to fulfill our obligations under the agreement, we need to have contact information to a number of roles within the customer or partner organization.
Storage period	We store customer and partner data for as long as there is an agreement between your organization and ProOpti, and thereafter for a period of 24 months in order to have contact information for billing and other issues related to terminating the services and the agreement. In order to comply with legal obligations, we might store certain information for a longer period. Should you as an individual end your employment at that
	organization you can request to be deleted earlier.
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Scenario	Registration of potential customers and partners in our CRM system.
Processing	To contact potential customers or partners via email, telephone or post with information about our services that we believe you might be interested in.



Categories of personal data	Your name, professional contact information (your work e-mail address, mailing address, and phone number, company, city, country) and your professional role.
Legal basis	Processing for the purpose of legitimate interest for ProOpti to market and sell product and services, since the personal data collected is limited and related to your professional role.
Storage period	As the sales cycle for our solution is long, on average 8-12 months, we keep CRM data up to 18 months after collection.
Scenario	When you apply for a job. Please refer to proopti.com.

### How do we protect your personal data?

We have technical and organizational security measures in place to protect your personal data against unauthorized processing (such as unauthorized access, loss or damage). Only authorized persons who need to process your personal data to fulfill our stated purposes will have access to the data. We perform reoccurring activities to maintain and improve the protection of your personal data.

### With whom might we share your personal data?

In cases where it is necessary for us to offer our services, we share your personal data with companies that are so-called personal data processors for us. A processor is an organization that processes personal data on our behalf and according to our instructions. We have written agreements with our processors regulating processing and security regarding personal data and the processors should be able to provide sufficient guarantees regarding the security of the processing.

We might also share your personal data with one of our reseller partners, as part of our sales process.

When your personal data is shared with a processor or partner, it is only for purposes that are consistent with the purposes for which we have collected the information.

We have personal data processors who assist us in marketing (such as printing and distribution), recruitment and operation of IT solutions (including maintenance and support).

Our website may link to third party websites, products, or materials published by third parties. These third-party sites have separate and independent privacy policies.

#### Where do we process your personal data?

ProOpti is an international company. The headquarters are in Sweden, but we have subsidiaries and employees in different parts of the world. Regardless of the country in which your personal data are processed, we take all reasonable technical and organizational measures to ensure that it is processed in a secure way.

**If the EU GDPR applies to you:** Your personal data might be processed outside the EU/EEA. Within ProOpti, we have so-called binding corporate rules to ensure that processing and protection of personal data is performed at the same high level throughout ProOpti.



For the operation of IT solutions, your personal data might be transferred to a processor of ours outside the EU/EEA. A processor may only process data relevant to a specific purpose. We take all reasonable technical and organizational measures to ensure that the level of protection is the same as within the EU/EEA. The level of protection is ensured either by a decision of the EU Commission that the country at hand ensures an adequate level of protection or using appropriate measures such as approved code of conduct in the recipient country, standard contractual clauses, binding corporate rules or privacy shield.

# What rights do you have as a data subject and how do you invoke those rights?

*Right to access.* If you want a deeper insight into what personal data we are processing about you, you can request access to the information. Please note that if we receive a request for access, we may ask for additional information to ensure the efficient handling of your request and that the information is provided to the right person.

*Right to rectification.* If any information about you is incorrect, you may request to have that information corrected. Within the stated purpose, you also have the right to supplement any incomplete personal data.

*Right to erasure (right to be forgotten).* You may request the deletion of personal data we are processing about you if: the data is no longer necessary for the purposes for which they have been collected or processed; you object to processing based on legitimate interest and your reason for opposition weighs heavier than our legitimate interest; personal data is processed unlawfully; or personal data must be erased to comply with a legal obligation we are subject to. Keep in mind that we may have the right to deny your request if there are legal obligations that prevent us from immediately deleting certain personal data or that the processing is necessary for us to determine, enforce or defend legal claims.

*Right to object to certain types of processing.* You are always entitled to object to direct marketing. In cases where we use legitimate purpose as a legal basis, you have the right to object to the processing. In order to continue processing your personal data after such objection, we need to show that our legitimate interest weighs heavier than your interests, rights or freedoms.

You can invoke you rights by contacting us on privacy@proopti.com or ProOpti AB, "Privacy", P.O. Box 24169, 104 51 Stockholm. In order for us to carry out your request we need your contact information. We might also need to ask for information to ensure your identity.

Should you believe that your rights are not respected, please contact us so that we can agree on an appropriate action. If you thereafter still have objections, you can consult the Swedish Supervisory Authority (for current contact information please refer to www.datainspektionen.se).

### How do you contact us regarding privacy concerns?

You can contact us on privacy@proopti.com or ProOpti AB, "Privacy", P.O. Box 24169, 104 51 Stockholm.

### What happens if we change this privacy policy?

We may make changes to our privacy policy. The latest version of the privacy policy is always available on the legal section of our website, see Privacy Policy.