

Privacy Policy

1 Introduction

This privacy policy outlines how we collect, use, disclose, and safeguard your personal data in accordance with the General Data Protection Regulation (GDPR) the UK General Data Protection Regulation (UK GDPR) and other applicable data protection legislation that may apply to you.

When referring to "**we**" or "**us**," we are specifically referring to the Destiny Group Company that you or your employer have entered into an agreement with or have otherwise been in contact with. In this context, the term "**Destiny Group Company**" refers to one of the following entities: Destiny for Service Providers AB, Destiny Analytics AB, Destiny Automate Ltd, Destiny for Service Providers NV, or Destiny for Service Providers BV.

2 Scope of the policy

This privacy policy applies to company representatives engaging in agreements, contacting us or using the documentation portal 'D4SP Zone' or other D4SP web interfaces provided by us. It also extends to individuals applying for job positions or contacting us directly. Each Destiny Group Company operates as an independent controller for the personal data described in this privacy policy. The specific company that you have engaged with will be responsible for handling your personal information as described in this privacy policy.

Please note that this privacy policy does not cover the use of the services provided by a Destiny Group Company to a customer (the "**Services**"). The processing of personal data within the Services is governed by a separate Data Processing Agreement (DPA) established between us and the customer as part of the Service agreement. As the data controller, the customer retains control over the organization account and governs the processing of any messages, voice recordings, files, or other content submitted through the Services. The applicable Destiny Group Company acts as the data processor in this context.

If you have any inquiries regarding data processing within the Services, we kindly request that you contact the organisation who invited you to use them.

3 Information we collect

Personal data means any data that can be used to identify you personally, such as your name, address, telephone number or email address. The specific personal data we process about you depends on the services you use and the data you choose to share with us. The following types of personal data may be collected and processed by us:

- **Contact details**, such as name, personal identification number (if you are a sole trader, email address, and telephone number.
- **Technical data**, such as IP address, login data, username, password and aggregate usage data on how you use the web interfaces, what you click and how long you stay on a web page.

- **Personal data provided in communication with us**, including any information that you choose to share with us. We urge you to not share any personal data that may be considered sensitive or that is otherwise not required for the purpose.
- **Job applications**, which may include contact details, date of birth, gender, photo, and other information included in your resume or cover letter, as well as information included in notes and evaluations executed by us in connection with application reviews and job interviews.

4 How we process your personal data

- **Communication and customer service.** We process contact details and communication information to address service inquiries and other requests. This is based on our legitimate interest in providing customer service.
- **Entering into agreements.** If you are a company representative, we may process your contact details provided in agreements or related documentation necessary for the performance of the contract.
- **Providing the D4SP Zone and other D4SP web interfaces.** If you have been granted access to the D4SP Zone or other D4SP interfaces, we utilize technical data to deliver, secure, and enhance the web interfaces. This includes activities such as bug fixing and heat mapping to improve the user experience. Such processing is conducted based on our legitimate interest in providing reliable and optimal services.
- **Providing and improving our products and services.** We process your personal data to provide and enhance our products and services. This processing is based on our legitimate interest in delivering high-quality products and services to our customers.
- **Invoicing, administration, and bookkeeping.** For any agreements with us, we process your contact details for invoicing and administrative purposes. This is necessary for the performance of the contract and compliance with legal obligations.
- **Marketing.** We may process contact details of company representatives for promotional emails about our services. You can unsubscribe at any time using the provided "unsubscribe" instructions. This processing is based on our legitimate interest in promoting our services.
- **Managing recruiting.** If you apply for a position with us, we process your job application and related information to assess candidates for vacant positions. This processing is based on our legitimate interest to assess applicants for vacant positions.
- **Business operation.** We process your personal data to fulfil legal requirements, protect our legal rights, and prevent fraud and other illegal activities. This processing is based on our legitimate interest in operating and safeguarding our business.

5 Data retention

How long we retain your personal data will vary depending on the purpose for which we collected the data. We will retain your personal data for as long as we deem it necessary for the purpose the data was collected for, to comply with applicable laws (including

those regarding document retention), resolve disputes and otherwise as necessary to allow us to conduct our business.

6 Data security

We take several steps to keep your personal data secure and to prevent accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data processed by us. We implement several technical and organizational security measures, including access control, authorization control, entry control, and encryption procedures. You can read more about the security steps we take in our Dstny Security White Paper.

7 Disclosure of personal information

We collaborate with select trusted third parties to support, enhance, promote, and safeguard our business operations. These third parties may assist us with tasks such as managing communication services, data storage, and web hosting. In certain cases, it is necessary for us to share your data with these partners to facilitate their services. We only share the specific data required to fulfil the respective service, and we ensure that all third parties handling your data adhere to this privacy policy. We do not sell any personal data to third parties.

In the event of a merger or sale of our business (in whole or in part), your personal data may be shared with or transferred to the merged or acquiring entity. In such a scenario, your personal data will continue to be processed in accordance with this privacy policy.

We may disclose your personal data to public authorities or other third parties when required by law or when necessary to protect or defend our legitimate rights and interests, as well as those of our customers, users, employees, directors, or shareholders. Additionally, we may share your data to ensure the safety and security of our Services.

We may also share your personal data among the companies within our group for the purposes outlined in this privacy policy. These group companies are required to handle your data in accordance with the principles set forth in this policy.

8 International transfers of personal data

The personal data we collect about you is primarily processed and stored within the European Economic Area (EEA). However, in certain instances, we engage third-party service providers located outside the EEA for specific aspects of our business and services, such as hosting and support services. This may result in the transfer of your personal data to countries outside the EEA.

When transferring data outside the EEA, we take necessary measures to ensure that your personal data is handled and stored in compliance with this privacy policy. These measures may include the implementation of "standard contractual clauses" with the recipient who will access your personal data outside the EU/EEA. We also enforce additional security measures, such as encryption and pseudonymization procedures, to safeguard your personal data during such transfers.

9 Children's privacy

Our services are not directed to children under the age of 13, and we do not knowingly collect personal information from children without parental consent. If you believe that

we have collected personal information from a child without proper consent, please contact us immediately.

10 Your rights to your personal data

You have the right to request access to, rectification of, and erasure of your personal data. You also have the right to object to the processing of personal data and request restriction of the processing of personal data. Furthermore, you have the right to request that personal data be transferred from us to another data controller (also known as data portability). We always aim to handle all requests or complaints in a legal, fair, and transparent manner. If you believe that your rights have been infringed, you have the right to lodge a complaint with the relevant authority in your country of residence.

You may be entitled to additional rights under applicable legislation or provisions. However, please be aware that there may be certain limitations on our ability to erase certain personal data, such as data that we are required to retain by law or regulations.

To exercise your rights, please contact us using the contact information provided under the "Contact Information" section below.

11 Changes and updates to this privacy policy

Occasionally we may, in our discretion, make changes to this privacy policy, for example due to legal requirements or changes in our processing of personal data. The latest version of the privacy policy is always available at <https://www.dstny.com>. If we make material changes or updates that affect your legal rights and obligations, we will notify you prior to such changes are applied.

This privacy policy was last updated: 5 July 2023.

12 Contact information

If you have any questions or opinions about this privacy policy or regarding our processing of your personal data, please don't hesitate to contact our data protection officer at d4sp.privacy@dstny.com.

13 Company details

Destiny for Service Providers AB

Company no.: 556890-1747

Address: Lumaparksvägen 9, 120 31 Stockholm, Sweden

Destiny Analytics AB

Company no.: 556671-9695

Address: Slottsgatan 4, 722 11 Västerås, Sweden

Destiny Automate Ltd

Company no.: 08414530

Address: AW House, 6-8 Stuart Street, Luton, Bedfordshire, England, LU1 2SJ

Destiny for Service Providers NV

Company no.: 0452.498.367

Address: Chaussée de Bruxelles 408, 1300 Wavre

Destiny for Service Providers BV

Company no.: 30239336

Address: Schaardijk 372 3e verdiepin, Capelle aan den IJssel, 2909LA, Netherlands