

# Privacy Policy

## Destiny for Service Providers AB & Destiny Analytics AB

*Updated 06 July 2022*

### INTRODUCTION

In this privacy policy we describe the personal data we collect, how and why we use it, and what choices and rights you have regarding your personal data. This privacy policy applies to you as a representative of a company when you enter into an agreement with us, request support regarding our services purchased from us or otherwise are in contact with us. This policy also applies to you as an individual when you apply for a vacant job position or otherwise get in touch with us.

When referring to “**we**” or “**us**”, we mean Destiny for Service Providers AB or Destiny Analytics AB (each a “**Dstny Group Company**”), as applicable, depending on which of the companies you have been in contact with.

### Who is responsible for the processing of your personal data?

Unless explicitly stated otherwise, the legal entity responsible for the processing of personal data described in this privacy policy, also called the “data controller”, is the Destiny Group Company that you or your employer has entered an agreement with or that you otherwise been in contact with.

Please note that this privacy policy does not apply to the use of the business communication tools provided by a Destiny Group Company (the “**Services**”). The access and use of the Services is governed by a separate agreement entered by your employer or another third party that has invited you to use the Services (the “**Customer**”). The Customer controls the organisation account that a user is invited to and governs the processing of any messages, voice recordings, files or other content submitted through the Services (collectively “**Customer Data**”). The Customer is the data controller for Customer Data and the applicable Dstny Group Company is the data processor. If you have any questions about the data processing within the Service, please contact the Customer that has invited you to use the Services.

### YOUR PERSONAL DATA

#### What is personal data?

Personal data means any data that can be used to identify you personally, such as your name, address, telephone number or e-mail address.

#### What personal data do we process?

What personal data we process about you depends on what services you use and what data you choose to share with us. The following personal data may be collected and processed by us:

- **Contact details**, such as name, personal identification number, e-mail address, and telephone number.

- **Technical data**, such as IP address, login data, usage data, username, and password.
- **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.

### How and why do we process your personal data?

We process your personal data for the following purposes:

- **Communication and customer service.** We process your contact details and information provided in communication with us to respond to service queries and other requests. The processing is based on our legitimate interest to provide customer service.
- **Entering into agreements.** If you are a company representative, we may process your contact details provided in agreements or other related documentation. The processing is necessary for the performance of the applicable contract.
- **Providing support.** If you or the company you represent has entered into a Service agreement with us, we may process your contact details and technical data for providing technical support and related support platforms under the agreement. The processing is necessary for the performance of the applicable contract.
- **Invoicing, administration, and bookkeeping.** If you or the company you represent has entered into any agreement with us, we may process your contact details for invoicing and administration purposes. The processing is necessary for the performance of the applicable contract and for compliance legal obligations we are subject to, such as retaining certain accounting information in accordance with the Swedish Accounting Act.
- **Marketing.** We may process company representatives' contact details to promote our services via e-mail. The processing is based on our legitimate interest to promote our services to our existing and potential customers. You can choose to unsubscribe at any time using the "unsubscribe" instructions provided in each e-mail.
- **Managing recruiting.** If you apply for a vacant position at a Dstny Group Company, we will process your job application and related information. The processing is based on our legitimate interest to assess applicants for vacant positions.
- **Business operation.** We may process your personal data to fulfil legal requirements, safeguard our legal rights and prevent fraud and other illegal or harmful activities that could affect us, our services, or our customers. This processing is based on our legitimate interest to operate and protect our business.

### For how long do we retain your personal data?

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.

## **How do we protect your personal data?**

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.

## **Who can get access to your personal data?**

We use certain trusted third parties to help us provide, improve, promote, and protect our business and operations. For example, we use third parties to provide support portals and to manage data storage and web hosting on our behalf. For our partners to perform their services, it is sometimes necessary for us to share your data with them. We only share such data that is required to perform the service in question. We also ensure that all third parties who get access to your data are required to handle such data in accordance with this privacy policy.

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

We may share your personal data with public authorities or other third parties when required by law or when it is necessary in order to protect or defend our legitimate rights and interests, or those of our customers, users, employees, directors or shareholders, and/or to ensure the safety and security of the Services.

## **International transfers of personal data**

The personal data that we collect about you is mainly processed (and stored) in the European Economic Area (the “EEA”). For some parts of our business and services, e.g., hosting and support services, we use third-party service providers based outside of the EEA, which means that your personal data can be transferred to countries outside of the EEA. When we transfer data outside the EEA we take necessary steps to ensure that your personal data is used and stored in accordance with this privacy policy. Such actions may include signing so called “standard contractual clauses” with the recipient that gets access to your personal data outside of the EU/EEA and implementing additional security measures such as encryption and pseudonymization procedures.

## **Your rights to your personal data**

You always have the following rights in relation to your personal data:

- **Right of access.** You always have the right to understand what personal information we collect and share. You have the right to ask us for supplementary information on why we process your personal data, what type of data we process, how long we store your data (or what criteria we use for determining the storage period), who we share your data with, and whether your data is transferred to countries outside of the EEA.
- **Right to rectification.** You always have the right to correct or ask us to correct any inaccurate personal data about you.

- **Right to erasure (“right to be forgotten”) or restriction of processing.** You have the right to have us erase or restrict the use of your personal data that is no longer needed for the purposes we collected the data. You also have a right to object to any processing you find unlawful or unnecessary for the informed purposes.
- **The right to information on the source of data we collect.** You have a right to get information on the source of information that is not provided by you and about automated decision-making, such as profiling.
- **Right to data portability.** When technically possible, you have the right to get your personal data transferred to another service.
- **Right to object.** You always have the right to object to our processing of your personal data if we process it based on our legitimate interest, or if we process the data in order to execute direct marketing towards you.
- **Right to make a complaint.** If you are unhappy with the way we process your personal data, you have the right, at any time, to file a complaint to the Swedish Authority for Privacy Protection [imy@imy.se](mailto:imy@imy.se) or the competent supervisory authority in your country of residence.

You may be subject to legislation or provisions providing you with additional rights. However, please note that there may also be restrictions for us to erase certain personal data, such as personal data we are required to store by law or regulations.

To exercise your rights, please contact us using the contact information under “*Contact information*” below.

### **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 [website]. If we make material changes or updates that affect your legal rights and obligations, we will notify you prior to such changes are applied.

### **Contact information**

If you have any questions or opinions about this privacy policy or regarding our processing of your personal data, you can always contact our data protection officer at [d4sp.privacy@dstny.com](mailto:d4sp.privacy@dstny.com)

### **Company details**

#### **Destiny for Service Providers AB**

Reg. no.: 556890-1747

Address: Lumaparksvägen 9, 120 31 Stockholm, Sweden

#### **Destiny Analytics AB**

Reg. no.: 556671-9695

Address: Slottsgatan 4, 722 11 Västerås, Sweden