

PRIVACY POLICY

In order for you to feel comfortable with our processing of your personal data, in this policy we describe how we, PacketFront Software Solutions AB (“PFSW”), as the data controller under the GDPR, process your personal data when you, for example, contact us or enter into an agreement with us.

Also at the bottom is information about your rights regarding your personal data and how you can exercise them. If you have any questions regarding our processing of your personal data or this policy, you can contact us at any time at GDPR@pfsw.com or by writing to Barnhusgatan 20, SE-111 23 Stockholm, Sweden.

This policy may, from time to time, need to be amended or updated. The latest version of our privacy policy will always be available on our website. If any significant changes are made, you will be informed of this on our website or in another appropriate manner.

Please note that this policy describes only the processing that we carry out as a data controller, not as a data processor.

HOW DO WE COLLECT YOUR PERSONAL DATA?

From you. The information we collect from you is typically the information you provide to us in connection with your communication with us.

From other sources. If you are to act as a representative of a company that enters into an agreement with us, we may collect your personal data from the company that you are to represent.

THE PROCESSING WE CARRY OUT

Here we describe the situations where we process personal data, which data is affected, and why we process the data. We also state what our basis is for processing personal data and how long the processing usually lasts.

- **When you represent a company or are appointed as a contact person**

If you act as a contact person or representative of a company that enters into an agreement with us, we process your name, e-mail address, and phone number in order to provide our services and charge for them, as well as to administer our relationship with the company on an ongoing basis. Processing is on the basis of our legitimate interest in being able to fulfil the agreement with your company. Processing continues until the contractual relationship with the company in question has been terminated and the final invoice issued.

- **When you send us a ticket (request)**

We give our customers the opportunity to send us tickets. A ticket is a request to fix a bug or to develop a feature, for example. If you send us a ticket, we will process your name, e-mail address, and other information that you include in your ticket. We process this information in order to evaluate and action the request. Where applicable, this also serves as a basis for invoicing the customer. Our processing is on the basis of our legitimate interest in being able to manage tickets from customers and, where applicable, to charge them. Processing continues until your ticket and the contractual relationship have been concluded and the final invoice has been issued.

- **When we want to tell existing customers about our other services**

If you are an employee or consultant of one of our customers, from time to time we may process your e-mail address to send you information about our other services that we believe may interest your company. Processing is on the basis of our legitimate interest in being able to market our range of other services and new services to existing customers. Processing will continue until we have completed and followed up on the mailshot, and you will always have the opportunity to say no to receiving marketing in the future.

- **When you want to find out more about us**

If you let us know that you want to find out more about our services (for example, if you give us a business card or meet us at a trade fair), we will process your name and contact information to get back to you and to engage in dialogue with you about our services. Processing is on the basis of our legitimate interest in being able to market our services to those who we think may be interested. Processing will continue until we have ended the dialogue with you.

- **When you contact us**

If you contact us by phone, e-mail, or our contact form on our website, we will process your name and contact information to answer your questions and provide information about ourselves. Processing is on the basis of our legitimate interest in being able to manage the questions and requests we receive. Processing will continue until we have ended the dialogue with you.

DO WE SHARE YOUR DATA?

Your personal data will be shared with trusted companies that help us deliver our services. We use companies that provide CRM systems and systems for sending e-mails. These companies are data processors in that they may process personal data only according to our instructions. In the case of legal proceedings, personal data can also be shared with those involved in the process, such as lawyers.

WHERE IS YOUR PERSONAL DATA PROCESSED?

In some circumstances, your personal data may be transferred to and/or stored with companies outside the EU/EEA where other rules may apply to your personal data that may offer poorer protection. However, we always take the measures necessary to ensure that your personal data is always offered an adequate level of protection in accordance with the General Data Protection Regulation (GDPR). These measures include our inclusion of the European Commission's standard contractual clauses or ensuring that service providers are located in a country that the European Commission deems to have an adequate level of protection. If you want to know more about exactly which protection measures we apply regarding your personal data, please contact us at GDPR@pfs.com.

WHAT ARE YOUR RIGHTS?

- **Obtain information on and access to your data.** You can request information as to whether we are processing your personal data and how it is collected, used, shared, etc., as well as get a copy of your personal data at any time. The first copy you request will always be free. However, in the event of repeated or unreasonable requests for copies, we may charge an administrative fee.
- **Object to our processing.** You have the right to object to the processing of your personal data for legitimate interests and we must cease our processing if we cannot demonstrate that there are compelling legitimate reasons for further processing. You are welcome to contact us for more information regarding this balance of interests for processing based on our legitimate interests. You also have an unconditional right to object to direct marketing.
- **Delete your personal data.** You are entitled to request that personal data be deleted if it is no longer necessary for the purpose for which it was collected or otherwise processed, or if there is no longer a legal basis for its processing.
- **Correct incorrect data.** You are entitled to request that incorrect data about you be corrected. Furthermore, you are entitled to supplement incomplete personal data.
- **Limit our processing.** You are entitled to request that the processing of your personal data be limited until incorrect data is corrected or an objection from you has been dealt with.
- **Revoke your consent.** You are entitled to withdraw your consent at any time. Note, however, that this does not affect processing prior to your revocation.

- **Transfer your data to another data controller.** You have, in some cases, the right to obtain the personal data that we process about you in order to fulfil our agreement with you and transfer this data to another data controller.
- **Submit a complaint to the supervisory authority.** You are entitled to submit a complaint to the Swedish Authority for Privacy Protection if you feel that we have processed your personal data incorrectly. Find out more at www.imy.se. You can also contact the supervisory authority in the country where you live or work.