

## PRIVACY POLICY

### APHELION GROUP

This Privacy Policy has been adopted by Aphelion Consulting AB (556691-8065) ("Aphelion", "we", "us", "our") and applies to our processing activities in relation to individuals visiting or using our websites and social media pages or receiving newsletter or other information from us.

Aphelion processes personal data in accordance with applicable personal data protection legislation. Within the EU/EEA, the general data protection regulation ("GDPR") will apply from 25 May 2018.<sup>1</sup> Aphelion is committed to protecting and respecting your privacy. Therefore, you are encouraged to carefully read this Privacy Policy in order to learn how we process your personal data within our business.

#### 1. DATA CONTROLLER

- 1.1 Aphelion is the data controller for the processing activities carried out by or on behalf of Aphelion. This means that we are the company that determines the purposes and means of the processing of your personal data, i.e. why and how we process your data.
- 1.2 If you have any questions regarding the processing of your personal data, you may contact us via the contact information listed below in section 8.

#### 2. WHAT IS PERSONAL DATA AND DATA PROCESSING?

- 2.1 Personal data is all information that directly or indirectly (i.e. together with other information) may identify an individual. This means that a wide range of data, such as e.g. name, contact details, IP address, behaviour and choices made are personal data.
- 2.2 Data processing is any operation or set of operations performed upon personal data, whether or not by automatic means, such as collection, recording, organization, storage, adaptation or alteration, blocking, erasure or destruction of personal data.

#### 3. APHELION'S PROCESSING AV PERSONAL DATA?

##### 3.1 What personal data is collected and processed and when is it deleted?

When you use our services, visit our webpage or communicate with us by other means, we may collect and process your personal data, e.g. your name, contact details, email address, customer ID, IP number etc.

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<sup>1</sup> REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

Personal data that we request from you is required to be provided in order for us to provide services, certain features or fulfil requests from you (for contractual, administrative, technical or similar reasons).

The personal data will be processed by us for as long as it is necessary in order for us to fulfil the purposes of the processing (see section 3.2). We have routines in place to ensure that personal data is deleted thereafter.

### 3.2 For what purposes is the data collected and processed?

Aphelion may process your personal data for the following purposes:

**Marketing activities:** Aphelion may process your personal data in order to administrate marketing activities such as newsletters and other information which we think may be of interest for you. Aphelion may also process your personal data for direct marketing purposes including providing you with information on products and services. If you wish to unsubscribe from newsletters and/or other marketing information, please see un-subscription link in the bottom of the newsletter or e-mail [support@aphelion.se](mailto:support@aphelion.se).

**Analysis and statistic:** Aphelion may use your data to improve our products and services and for follow up and statistic purposes.

**Use of our Services:** Aphelion may save personal data when registering an account in our system. We will handle all information according to applicable law and our customer's instructions (which is considered the data controller).

**Use of Cookies and other Tracking Technologies:** "Cookies" are small pieces of information stored on your hard drive as small text files to allow that site to recognize you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, we use cookies to store your preferences. This helps us to improve our Site and deliver a better and more personalized service.

Our site and some of our Services use different types of cookies and other similar Tracking Technologies (like web beacons, tags and scripts) to uniquely identify your browser and to gather information about how you interact with the site and Services. We use this information for the following purposes:

- Assisting you in navigation;
- Assisting in registration, login, and your ability to provide feedback;
- Analyzing your use of our products, services or applications; and
- Assisting with our promotional and marketing efforts.

## 4. LEGAL GROUND AND LEGITIMATE INTEREST

We will process your personal data when it is necessary for (i) the performance of a contract with our customers or to fulfil a request from you, or (ii) compliance with a legal obligation.

Your data may also be processed when it is necessary for the purposes of a legitimate interests for Aphelion, *inter alia*, for direct marketing purposes.

If a certain data process requires your prior consent, we will collect such consent before carrying out the processing in question.

## **5. INFORMATION SECURITY**

We strive to provide a high level of protection in all our personal data processing. We have therefore taken organisational and technical security measures in order to protect your personal data from unauthorised access, use, alteration and erasure.

## **6. TO WHOM DO WE DISCLOSE THE PERSONAL DATA?**

6.1 Your personal data may be shared within the Aphelion group of companies for the purpose of providing you with information regarding our services and products, if we think it could be of interest for you.

6.2 Aphelion may engage third parties for the provision of services to Aphelion, including IT-systems, services and other activities. Your data may be shared with and processed by such service providers on behalf of Aphelion as required for the provision of the services to Aphelion. Within the use and provision of such services, your personal data may be transferred to countries outside the EU/EES (third countries). In relation to such third country transfers, certain security measures will be taken in order to protect your data and ensure that the data keeps an adequate level of protection, e.g. by entering into a data transfer agreement including standard clauses issued by the EU Commission.

6.3 Personal data may be disclosed to a third party if we are required to do so according to applicable laws and regulations or in order to detect and prevent fraud or other security or technical problems.

## **7. YOUR RIGHTS UNDER APPLICABLE DATA PROTECTION LEGISLATION**

7.1 According to applicable data protection legislation, you are entitled to certain rights. If you want to exercise any of these rights, please contact us at the address specified in section 8 below.

7.2 As specified in applicable data protection legislation, you have the right:

- to request access to and rectification of the personal data we process in relation to you;
- to request erasure of your personal data;
- to request that we restrict the processing of your personal data;
- to object to the processing of your personal data and, in respect of processing based on your consent, to withdraw your consent at any time; and

- to receive personal data about you that you have provided to us.

You are furthermore entitled, at any time, to submit complaints to the relevant supervisory authority if you think that your personal data is being processed in violation of the applicable data protection legislation.

## **8. CONTACT INFORMATION**

If you have any questions regarding the processing of your personal data or want to exercise any of your rights under applicable data protection regulation, you may reach out to us via the following contact details: [support@aphelion.se](mailto:support@aphelion.se)

This Policy was last updated in January 2018.