

Privacy Policy

OFISTIC8 AB 559158-3280 Malmö, Sweden



This Privacy Policy is effective as of 29th of June 2021

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1. Background

This policy (“**Privacy Policy**”) has been established in order to ensure and make You aware that OFISTIC8 AB (“**OFISTIC8**”, “**we**”, “**us**”) processes Your personal data in a legal, appropriate and safe manner when You or the company You represent purchase or use our services or products, visit our website or come in contact with us in some other way.

The Privacy Policy is applicable to Workipelago Software as a Service provided by OFISTIC8. This means that if You choose to use Workipelago, You also agree to the collection and use of Your personal data according to this Privacy Policy.

The Privacy Policy describes how OFISTIC8 processes Your personal data and which rights You have according to the rules in the EU’s General Data Protection Regulation (GDPR) (EU) 2016/679 with associated statutes of implementation and supplementary statutes on data protection (the “**Data Protection Rules**”).

2. Definitions

In this Privacy Policy, the term "personal data" refers to any information which can be attributable to an identified or identifiable natural person, such as e.g. name, address, personal registration number, e-mail address, phone number, IP-address and photo (“**Personal Data**”).

This Privacy Policy describes how we Process Your Personal Data. The term "processing" refers to any operation or set of operations which is performed by us on Your Personal Data or on sets

of Personal Data in such a manner as is described in this Privacy Policy, e.g. our collection, registering, storing, disclosure, erasure and any other using of Your Personal Data (“**Processing**”).

3. When do we process Your Personal Data?

The Privacy Policy applies in the following cases when Processing of Personal Data arises in our business:

- (i) when OFISTIC8 provides services to You or the company You represent;
- (ii) to mailings of newsletters, invitations to events and other information;
- (iii) upon Your participation in courses, workshops, seminars and events that are held or arranged by us;
- (iv) in connection to visits to OFISTIC8 or Workipelago websites (“**Website**”) or related websites or via social media platforms;
- (v) to requests or other contacts with us via e-mail or phone.

4. Data controller

OFISTIC8, Reg. No. 559158-3280 with address Aktrisgatan 12, 215 83, Malmö, Sweden is the data controller for the processing of Your personal data which is carried out in accordance with this Privacy Policy.

5. Why do we Process Your Personal Data?

OFISTIC8 Processes Personal Data regarding our customers, our customers representatives and contact persons, potential customers, employment-seekers, suppliers, other business partners and potential suppliers and business partners. OFISTIC8 only collects and Processes Your Personal Data for specific purposes. This entails that Personal Data is Processed in order to:

- (i) provide services and fulfil the agreement entered into with You personally, the company or organisation You represent or work for, or the company or organisation You work on behalf of;
- (ii) provide seminars, workshops, courses, and other events;
- (iii) enable general customer relationships management (quality management, statistics, market and client analyses, as well as business and methodological development) and customer service and support, e.g. when You contact us via e-mail, phone or via our Website.
- (iv) inform and market our business through, inter alia, publishing customer references and other material on our Website, in presentation material used at events, or via brochures;
- (v) leave information regarding events and news, and address marketing information via e-mail, phone or via social media platforms regarding our business and our services;

- (vi) process a job application;
- (vii) prevent fraud, money laundering and financing of terrorism, and carry our risk management; and
- (viii) comply with applicable legislation.

What Personal Data we collect and Process depends, inter alia, on (i) how You come in contact with us, and (ii) which of our services we provide to You or the company You represent.

In addition to the Personal Data You provide to us, or that we collect when providing our services, we may also collect Personal Data from third parties. These third parties vary from time to time but include inter alia suppliers of public record information, such as address information in order to ensure we have the correct address information, as well as credit rating agencies (CRA's) or banks from where we obtain information regarding creditworthiness or information in order to conduct anti- money laundering controls.

When You are asked to provide us with Personal Data, e.g. upon the purchase of a service or participation in an event, You may choose not to do so. If You choose not to provide necessary information, this may lead to us not being able to fulfil our commitments towards You or the company You represent.

6. What Personal Data is Processed on what legal ground?

The Personal Data listed below is Processed by us for the purposes explained under section 5 above:

- (i) name;
- (ii) billing and delivery address;
- (iii) phone number;
- (iv) e-mail address;
- (v) title of profession and place of work;
- (vi) customer number;
- (vii) IP-address;
- (viii) reviews;
- (ix) customer references;
- (x) photos; and
- (xi) information in correspondence with You.

The Processing of Personal Data is necessary in order for OFISTIC8 to conduct its business through providing sale and delivery of services and thereby fulfil the agreement that has been entered into with You (if You are a sole trader). In situations where You act as a representative or contact person for a company or organisation that is a customer of OFISTIC8, or in any other way collaborates with OFISTIC8, we Process Your Personal Data based on our legitimate business interest. For this Processing, we have conducted a balancing of interests where we have, inter alia, taken into account that the Processing does not include any sensitive Personal Data and that we have a clear commercial interest in being able to provide our services to the company or organisation You work for or on behalf of in an efficient manner.

The Processing of Personal Data is also necessary in order for OFISTIC8 to provide good service via our customer service and support and in order to be able to investigate potential complaints, and thereby meet our legitimate interest of handling customer service matters, developing our business and communicate our contacts in an efficient and customer friendly manner.

The Personal Data can also be Processed regarding other contacts with You, for example through newsletters and other dispatches, such as invitations to events, information regarding seminars and educations or other information which we consider to be relevant for You or the company or organisation that You represent. We Process Your Personal Data based on our legitimate business interest of being able to provide You, who are already an existing customer, or who used to have a business relation with us, relevant marketing and information. For this Processing, we have conducted a balancing of interests where we have, inter alia, taken into account that the Processing does not include any sensitive Personal Data and that we have a clear commercial interest in being able to provide our services to the company or organisation You work for or on behalf of in an efficient manner.

We may also process Your Personal Data with your consent, e.g. when You consent to our publishing of customer references on our Website or when You give Your consent to the use of cookies on our Website. In the event that we can no longer Process Your Personal Data for marketing purposes based on our legitimate business interest we may come to obtain Your consent to e.g. send You information. We will always document whether You have given Your consent to our Processing of Your Personal Data.

Your Personal Data is also Processed, in applicable cases, in order for OFISTIC8 to comply by its obligations stemming from applicable legislation, court rulings and decisions taken by the authorities. Such obligations may e.g. follow from the Accounting Act (1999:1078), the Money Laundering and the Financing of Terrorism (Prevention) Act (2017:630).

7. How long is Your Personal Data stored?

Your Personal Data is stored only as long as needed in order to fulfil the purposes for which the Personal Data was gathered in accordance with this Privacy Policy.

Personal Data which is Processed in order to validate, authorise and enable user access to OFISTIC8 or Workipelago websites or any other related website is stored for 12 months since the last log in to the website. If You have given Your consent to the Processing of Your Personal Data, OFISTIC8 processes Your Personal Data for the specific purpose, until You withdraw your consent. You can withdraw Your consent at any time by contacting us and objecting to this.

In order to ensure OFISTIC8's compliance with the legal obligations stemming from applicable legislation or in order to safeguard our legal interests we may store Your Personal Data for a longer period of time than what is stated above. The Personal Data is however never stored for longer than is necessary or statutory for each respective purpose.

8. Your rights

You have a right to receive information regarding the Processing of Your Personal Data we carry out. Below You find a statement of the rights You can claim by contacting us. Our contact information can be found at the very end of this Privacy Policy.

Right to access

You have a right to, free of charge, request information regarding our Processing of Your Personal Data. You also have a right to receive a copy of Your Personal Data that we Process. Such a request shall be submitted to us in writing. We will respond to Your request as swiftly as possible. If we cannot grant You access to the information Your request concerns, we will provide a reason as to why. The copy of Your Personal Data will be sent to Your registered address unless otherwise is agreed with You in writing. In order to ensure that the right person receives the information, we may come to request more information from You.

Right to rectification

The main responsibility to ensure that the Personal Data we Process is correct lies with OFISTIC8. If You inform us that the Personal Data You have provided to us is no longer correct, we will promptly correct, block or erase such Personal Data.

Right to erasure

You have the right to request that OFISTIC8, without unnecessary delay, erases Your Personal Data. Personal Data shall be erased in the following cases:

- (i) if the Personal Data is no longer necessary for the purposes for which it was collected;
- (ii) if You withdraw Your consent and the Processing was based solely on consent;
- (iii) if Processing is carried out for purposes of direct marketing and You oppose Your Personal Data being used for such purposes;
- (iv) if You oppose the Processing of Personal Data after a balancing of interests has been carried out and Your interest outweighs ours;
- (v) if Your Personal Data has not been Processed in accordance with the Data Protection Rules; or
- (vi) if erasure is necessary in order to comply with a legal obligation.

There may be obligations which hinder us from immediately erasing all Your Personal Data. These obligations stem from applicable legislation regarding inter alia accounting. If certain Personal Data cannot be erased due to applicable legislation or other rules of conduct that we are obligated to apply, we will inform You of this as well as ensure that Your Personal Data will be used solely for the purpose of complying with such legal obligations and not for any other purposes.

Right to restriction

You have a right to request that • temporarily restricts the Processing of Your Personal Data. Such a restriction can be requested in the following cases:

- (i) if You consider the Personal Data we have about You to be incorrect and in connection with this have requested rectification;

- (ii) when the Processing of Your Personal Data which is carried out is not compliant with the Data Protection Rules, but you still do not want your Personal Data to be erased but rather restricted; and
- (iii) when we no longer need your Personal Data for the purposes of our Processing but You need it in order to establish, exert, or defend a legal claim.

If You have objected against the Processing of Your Personal Data, the use of Your Personal Data may be restricted during the time of the investigation. Upon the restriction of Your Personal Data, OFISTIC8 will only store Your Personal Data and for further Processing obtain Your consent.

Right to data portability

You have a right to, in the cases where we Process Your Personal Data with Your consent or in order to fulfil contractual obligations toward You, require that we provide You with all Personal Data we have about You and which is Processed in an automated manner, in a machine-readable format, which may be inter alia an Excel-file or a CSV-file. If it is technically possible, You further have the right to require that we transfer Your Personal Data to another data controller.

Right to object

You have a right to object to our Processing of Your Personal Data if the Processing is based on our legitimate interest. OFISTIC8 will in such a case ask You to specify which Processing You object to. If You object to any Processing we will only continue our Processing of the Personal Data if there are legitimate interests for Processing which outweigh Your interests. We will also inform You about our decision.

9. Consent to the Processing of Personal Data

If You have consented to Processing of Your Personal Data, You decide if and when You wish to withdraw the voluntary consent that You have given to the Processing of Your Personal Data. You can withdraw Your consent by (i) contacting us and object to this in writing, or (ii) following the link in the mailings if the consent regards receiving marketing information and other information.

10. To whom do we transfer Your Personal Data?

In order to provide some of our services we appoint selected third parties. This entails that we share some of the Personal Data we have collected with them, e.g. to collaborative partners such as suppliers of IT-systems, assignment management systems, or which supply printing and distribution. In connection with such transfer of Your Personal Data, OFISTIC8 takes organisational and technical measures in order to ensure that Your Personal Data is handled in a safe and secure manner. These selected third parties will only process Your Personal Data in manners which follow from this Privacy Policy and in order to fulfil one or more of the purposes listed in this Privacy Policy. When such third parties are data processors for OFISTIC8 we are responsible toward You for that the Processing of Your Personal Data carried out by these third parties is carried out in a correct and legal manner. In such cases, we also have agreements with the suppliers containing instructions for the Processing of Personal Data in accordance with the Data Protection Rules.

OFISTIC8 may transfer Your Personal Data to countries outside the EU/EES, if any of our suppliers or business partners are located there. If Personal Data is transferred to a country outside the EU/EES, OFISTIC8 will ensure that the Personal Data will remain protected as well as take measures needed in order to transfer Personal Data to a country outside the EU/EES in a legal manner.

We will disclose Your Personal Data if it is required by law or if we, as a company, reasonably deem it to be necessary in order to protect our rights, e.g. by disclosing Personal Data to OFISTIC8's liability insurance provider and/or to comply with a court ruling or abide by the verdict of a legal process.

As the business is conducted today, OFISTIC8 will not sell Your Personal Data to a third party unless we have previously obtained Your consent. However, we may, in the case that OFISTIC8 decides to divide, sell, buy, merge with another company or organisation, or in any other way reorganise the business, transfer Your Personal Data to potential or actual buyers and their potential advisors.

11. How do we protect Your Personal Data?

In order to protect Your personal integrity, discover, prevent and limit the risks of a hacking attack etc., OFISTIC8 takes several technical and organisational information safety measures. OFISTIC8 also takes measures in order to protect Your Personal Data against unauthorised access, misuse, reveals, changes and damages. OFISTIC8 ensures that access to Your Personal Data is only granted to employees who need to Process it in order to fulfil their work assignments, and that they abide by confidentiality.

12. Supervision and compliance

If You are dissatisfied with how Your Personal Data has been processed or believe that Your Personal Data has been Processed contrary to The Data Protection Rules You can at first-hand contact us. You can also always turn to the supervisory authority in the EU Member State where You have Your place of residence or where the alleged breach has been conducted to file a complaint. The supervisory authority in Sweden is Datainspektionen, see www.datainspektionen.se.

OFISTIC8 annually reviews this Privacy Policy.

13. Third party's terms and conditions

OFISTIC8's services may in some cases be subject to third party's terms and conditions. OFISTIC8 is not responsible for such a third party's use of Your Personal Data as they themselves are data controllers and responsible for the Processing of Your Personal Data. Hence, it is important that You observe and read through the terms and conditions of such third parties. The same applies if there is a link on our Website to other websites.

14. Changes to the Privacy Policy

OFISTIC8 reserves the right to change this Privacy Policy when we deem it to be necessary. Such changes are usually warranted upon potential changes to applicable legislation, due to statements

from the supervisory authority or other authorities issuing statements pertaining to the Data Protection Rules. Further, this Privacy Policy will be updated when it is necessary due to changes in our business activities.

If OFISTIC8 makes comprehensive changes to this Privacy Policy or changes concerning how we Process Your Personal Data, you will be informed of this before such a change come in to force.

15. How do you contact us?

If You have questions pertaining to this Privacy Policy or the current Processing of Your Personal Data, wish to file a request in accordance with this Privacy Policy or wish to report a violation of this Privacy Policy etc., You are welcome to contact us via e-mail, phone or letter.

Data Protection Officer

E-mail: my@ofistic8.com

Phone number: +46 70 278 56 41

Address: Aktrisgatan 12, 215 83, Malmo Sweden

