

Data Protection Policy for Remote Technical Support Service

The company ProFlute AB, with its registered office at Box 1155,164 26 Kista, Sweden (hereinafter "**ProFlute**") is the data controller of the collection, processing and use of personal data associated with the remote technical support service (hereinafter "**Service**").

ProFlute collects, processes and uses the personal data in accordance with applicable data privacy laws, including the European Union's General Data Protection Regulation (the "**GDPR**"). The following information explains how ProFlute processes your personal data in connection with your use of the Service.

1. Types of personal data collected and processed

a. Personal data processed by third parties When you use the Service, certain personal data will be processed by Help Lightning that provides the software for the virtual interactive environment. ProFlute is not the controller of such processing of personal data and for information regarding Help Lightning's processing of personal data, please be referred to <https://helplightning.com/legal/privacy>.

b. Customer information processed to provide and use the Service

In order to be able to provide you with the Service, ProFlute will process your email address or telephone number. Such personal data is used to administrate your request for the Service and be able to send you a link that will allow you to connect to the Service.

c. Customer information processed for the continuous business relationship In connection with your use of the Service, ProFlute will collect your name, name of the company that you represent, telephone number and email address. Such personal data is used for the following purposes:

1. to register you in our customer management system in order to maintain the business relationship with the company that you represent, *e.g.* to offer the company you represent certain services;
2. if applicable, to register you as the reference on the invoice;
3. if needed, to follow-up the provided Service; and
4. for direct marketing purposes, *e.g.* to send you newsletters and provide you with information regarding updates and developments regarding our products and services.

2. Legal grounds

The processing of your personal data for the purposes described in Section 2 b. and c. above is based on our legitimate interest to provide you with and follow-up the performed Service, maintain our business relationship with the company you represent and to market our products and services.

To maintain our business relationship with the company you represent including to follow-up the provided Service, we only collect the personal data necessary to achieve such purpose. We will only share the personal data with third parties to the extent it is necessary to fulfil the purpose and will ensure that such parties process personal data in a responsible manner in compliance with applicable data protection legislation. The personal data collected to fulfill this purpose is related to your role at the company you represent and, thus, is not of a sensitive nature.

In relation to the processing of your personal data for direct marketing purposes, ProFlute has a legitimate interest to market our products and services. Marketing is a crucial part of our business and we always strive to provide you with marketing information that is relevant for your role at the company you represent. Furthermore, the personal data processed for this purpose is of a non-sensitive character and we will not share your personal data with third parties unless necessary to fulfil the purpose, e.g. we may share personal data with our marketing services provider. In all marketing material sent to you via email there is always a possibility to unsubscribe from further marketing and if you choose to do so, we will stop sending you marketing material by email.

Based on the abovementioned factors, we have conducted a balancing interest test with the result that we consider to have a legitimate interest that is not outweighed by your interest in not having your personal data processed for the described purposes. You are always entitled to object to this assessment. You can read more about your rights below.

3. Access to the personal data

ProFlute has implemented appropriate technical and organisational measures to protect your personal data against loss, accidental and unlawful access and unauthorised disclosure. The number of persons with access to your personal data is limited. Only individuals associated with ProFlute that need to process your personal data in accordance with the purposes above have access to your personal data.

ProFlute may share your personal data with other companies within the ProFlute, in order to provide an improved customer experience.

ProFlute may also share your personal data with suppliers and partners that carry out services on our behalf or in other ways collaborate with us, such as Help Lightning for the purpose of using their software for the virtual interactive environment. Other activities include customer relationship management, IT- services (such as operations and maintenance) and distribution of marketing and information material.

Your personal data may be transferred to countries outside of EU/EEA, including the United States, and countries in Latin America and Asia Pacific which may have a lower level of protection than within the EU/EEA. When transferring Personal Data to countries outside the EU/EEA, we use standard contractual clauses approved by the European Commission or rely on Privacy Shield certifications to ensure a sufficient level of protection for your Personal Data. The standard contractual clauses can be found [here](#), and you can read more about Privacy Shield [here](#).

4. General storage periods

Your personal data will only be stored as long as necessary for the purpose for which it was collected or as long as permitted or required under local law. This means that we will only retain your personal data as long as we have a business relationship with the company you represent. We will conduct yearly assessments to evaluate if your personal data remains necessary for the purpose for which it was collected.

5. Your rights

You are entitled to know what personal data we are processing about you, and you can request a copy of such data. You are entitled to have incorrect personal data about you corrected, and in some cases you may request that we delete your personal data. If you have given your consent to the processing of your personal data for an explicit purpose you may always withdraw your consent. If you want to

withdraw your consent, you may contact us through the contact information provided in the introduction. You are also entitled to object to certain processing of your personal data, and request that the processing of your personal data should be limited. Under certain circumstances you are also entitled to extract your personal data in a structured, commonly used and machine-readable format and to transfer the personal data to another controller.

If you have questions regarding how we process personal data about you, you are most welcome to contact us at the contact information stated below.

If you have any objections or complaints about the way we process your personal data, you have the right to file a complaint to the Swedish Data Protection Authority (Sw. *Datainspektionen*) or in the member state where you live, where you work or where the alleged violation took place.

6. Contact information

ProFlute AB Box 1155,164 26 Kista, Sweden

Email address: info@proflute.se

Telephone number: +46 (0)739 121 600

7. Changes to the Data Protection Policy

Changes to the above Data Protection Policy can be made by ProFlute on a non-regular basis.

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