

PRIVACY POLICY

Thank you for choosing Abylon AB ('Abylon', 'Us', 'We', 'Our').

This Privacy Policy is relative to anyone who contacts/interacts with us, or utilises our website: www.abylon.se ('our website'), in anyway.

We respect your privacy and therefore committed to protecting your personal data. This policy highlights:

- How we preserve your personal data when visiting our website,
- Your privacy rights, and
- How the law protects you.

This policy was last updated in December of 2019.

We may amend, change or update this Privacy Policy on our website from time-to-time. We do this to reflect latest changes to our service, our users' needs and our own business priorities. Whenever you revisit our website, please refer back to this Privacy Policy to ensure no latest amendments are missed.

1. GENERAL INFORMATION:

(1.1) Purpose of this Privacy Policy

This policy aims to give you substantial information/knowledge on how we collect and process your personal data through the use of our website, and/or other data you may provide us with whilst contacting/interacting with us.

It is of importance to read this policy (together with any other policy we may provide), to fully understand how and why we use your data.

Our website is not intended for persons under the age of 18 and we do not knowingly collect data relating to minors.



This policy supplements other notices and alternative privacy policies; however, it is not intended to override them.

(1.2) Our Responsibility

Abylon owns and controls this platform and therefore is responsible for your personal data.

We have a Legal Department who's responsible for overseeing queries in relation to this Privacy Policy. If you have any questions regarding this policy (including any requests to exercise your legal rights), please contact us on: info@abylon.se.

Alternatively you can send us mail directly to our Postal Address: Sveavägen 98, 113 50 Stockholm, Sweden.

You have the right to make a complaint about us (at any time) to the Dataskyddsförordningen Office or by visiting their website: <https://www.datainspektionen.se/>

We would, however, appreciate the opportunity to deal with your concerns before approaching the Dataskyddsförordningen Office. Please don't hesitate to contact us for further assistance with this: info@abylon.se.

(1.3) Adjustments to this Policy

We work hard to keep our Privacy Policy under regular review.

With the above in mind, it is imperative that the personal data we hold about you, is accurate and current.

Please keep us informed if any of your personal data changes during your relationship with us.

(1.4) Third-Party Links

This website may include external links to third-party websites, plug-ins and other applications. Clicking on these links (or enabling those connections), may allow third-parties to collect and/or share personal data about you.

We do not control these third-party website and are not responsible for their privacy statements released.

When you leave our website, we encourage you to read the Privacy Policy of every website you visit.

2. INFORMATION COLLECTED BY YOU:

Personal Data (or personal information), indicates any form of information that allows us to identify who you are. This does not included data whereby the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you, which we have grouped together as follows:

- Identity Data: Includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data: Includes billing address, delivery address, email address and telephone numbers.
- Financial Data: Includes bank account and payment card details.
- Transaction Data: Includes details about payments to-and-from you, as well as other details of products/services you have purchased from us.
- Technical Data: Includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology found on the device you use to access our website.
- Profile Data: Includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data: Includes information about how you use our website, products and services.
- Marketing and Communications Data: Includes your communication preferences with regards to receiving marketing material from us and other third-parties

(2.1) Aggregated Data

We also collect, use and share aggregated data, such as statistical or demographic data for any purpose. Aggregated data could derive from your personal data, however it is not considered 'personal data' in law, as this data will not directly/indirectly reveal your identity.

For example: we may gather your usage-data/information in order to express this in a summary form, for purposes such as statistical analysis (i.e. which percentage of users are accessing specific website pages).

If in such cases we combine or connect aggregated data with your personal data (so that it can be indirectly/directly identified to you), we will treat this data as 'personal data' which will be used in accordance with this Privacy Policy.

(2.2) Special Categories of Personal Data

We do not collect any 'special categories' of personal data.

This includes details about your race/ethnicity, religion/beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data.

We also do not collect any information about criminal convictions and offences.

(2.3) Failing to Provide Personal Data

In the instance where we need to collect personal data in accordance to the law (or under the terms of a contract we have with you) and you fail to provide us with that data when requested; we may not be able to uphold the contract we currently-have, or will-have, with you (i.e. providing you with goods or services).

In the case we may have to cancel a product/service you have with us, we will notify you as soon as possible.

3. HOW DATA IS COLLECTED:

We use different methods to collect data, such as:

- Direct Interactions: You may give us your identity, contact and financial data by filling in necessary forms, or by corresponding with us via post, email or alternative sources. This includes personal data you provide when: contacting us, giving us feedback, requesting marketing material to be sent to you, subscribing to our services or publications, creating an account on our website, applying for our products or services.
- Automated Technologies or Interactions: As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our Cookie Policy for further details.
- Third Parties or Publicly Available Sources: We will receive personal data about you from various third-parties and public sources as set here: Analytics providers such as Google (based outside the EU), Advertising networks inside and outside the EU, Search Engine information providers inside and outside the EU. Contact, financial and transaction data from providers of technical, payment and delivery services based inside and outside the EU. Identity and contact data from data brokers or aggregators based inside and outside the EU. Identity and contact data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

4. HOW DATA IS USED:

We will only use your personal data when the law allows us to. In most common cases, we will use your personal data in the following circumstances: (1) When we need to create a contract we are about to enter into, or have already entered with, (2) Where it's necessary for our legitimate interests (or those of a third-party), whilst your interests and fundamental rights, do not override those interests, and (3) When we need to comply with a legal obligation.

Generally, we do not rely on 'consent' as a legal basis for processing your personal data (although we will get your permission before sending third-party marketing material via email or text message).

You have the right to withdraw your consent (at any time) to any marketing communications sent by us. You can do so by contacting our Legal Department on: info@abylon.se.

5. PURPOSE FOR USING PERSONAL DATA:

We have set out below - in a table format - a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you.
To manage our relationship with you, which will include: (a) Notifying you about changes to our Terms of Use or Privacy Policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you. (b) Necessary to comply with a legal obligation. (c) Necessary for our legitimate interests (to keep our records up-to-date and to study how customers use our products/services).

To enable you to partake in a prize draw, competition or complete a survey.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you. (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business).
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise). (b) Necessary to comply with a legal obligation.
To deliver relevant website content and advertisements to you, and measure/understand the effectiveness of the advertising we serve.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy).
To use data analytics to improve our website, products/services,	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products/ services, to keep our

marketing, customer relationships and experiences.		website up-to-date and relevant, to develop our business and to inform our marketing strategy).
To make suggestions and recommendations to you about goods or services that may be of interest.	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business).

6. MARKETING

We strive to provide you with alternative choices regarding certain personal data uses, particularly around marketing and advertising.

(6.1) Promotional Offers

We may use your identity, contact, technical, usage and profile data to form a view on what we think you may want or need (or what may be of interest to you). This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have (1) opted for this, or (2) have purchased goods/services from us in the past (and have not opted-out from receiving those marketing materials).

(6.2) Third-Party Marketing

We will get your express opt-in consent before we share your personal data with any third-party marketing purposes.

(6.3) Opting Out

You can contact us (or any third-parties) to stop sending you marketing communications by emailing us on: info@abylon.se. You can also do this by following the 'opt-out links' in the footer of any marketing communication sent to you.

When you opt-out to receiving marketing communications from us; please note that this will not apply to your personal data provided to us, as a result of a service purchase, warranty registration, service experience or other transaction.

(6.4) Cookies

You can set your browser to refuse all, or some browser cookies (alternatively alerting you when websites access your cookies).

If you disable or refuse cookies; please note that part(s) of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy.

(6.5) Change of Purpose

We will only use your personal data for the purpose of collecting it, unless we reasonably consider that we need this data for another reason (that's compatible with the original purpose).

If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us on: info@abylon.se.

If we need to use your personal data for an unrelated purpose, we will notify you in advance and inform you on the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

7. DISCLOSURE OF PERSONAL DATA:

We may share your personal data with the highlighted parties set out below. This relates to the purposes stated in Section Five (5): (1) Internal Third-Parties, (2) External Third-Parties, (3) Third-Parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third-parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes. We have only permitted them to process your personal data for specified purposes and in accordance with our instructions.

8. DATA SECURITY:

We are committed to protecting our users' personal data.

We have put in place appropriate security measures to help protect your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed (however please note that no system is ever completely secure).

In addition, we limit access to your personal data to employees, agents, contractors and other third parties who have a business need to know.

They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you (and any applicable regulator) of a breach where we are legally required to do so.

9. DATA RETENTION:

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for (including the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements).

We may retain your personal data for a longer period, in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the following: the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and applicable legal, regulatory, tax, accounting or other requirements.

In some circumstance, you may ask us to delete your data. Please see Section 10 for more information regarding this.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

10. YOUR LEGAL RIGHTS:

Under certain circumstances, you have rights under Data Protection laws in relation to your personal data.

Please see Section 11 for more information regarding this.

If you wish to exercise any of the rights set out above, please contact us on: admin@proverest.com.

(10.1) No Fee Required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

(10.2) Information Required

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also need to contact you to ask you for further information in relation to your request to speed up our response.

(10.3) Response Time

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

11. GLOSSARY:

Lawful Basis

- Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your

rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

- Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

Third Parties

- Internal Third Parties: Other companies in our group who provide IT and system administration services and undertake leadership reporting.
- External Third Parties: Service providers (acting as processors) who provide IT and system administration services, as well as Marketing tools such as Google, etc.. Professional advisers (acting as processors or joint controllers) including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services. HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers who require reporting of processing activities in certain circumstances.

Your Legal Rights: You have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected (though we may need to verify the accuracy of the new data you provide to us).
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (1) If you want us to establish the data's accuracy, (2) Where our use of the data is unlawful but you do not want us to erase it, (3) Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims, (4) You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.



- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.