

PRIVACY POLICY – AWAIO

This privacy policy details how we process and protect your personal data. The privacy policy covers the processing of personal data when using in connection with the use of the services and apps where reference is made to this policy and our websites and digital channels.

The privacy policy does not cover the processing of personal data undertaken by us in the role of a data processor. For more information on how we process personal data as a data processor, please see our data protection information below.

Personal data is information that can identify you directly or indirectly.

It is important to us that you feel comfortable with how we process your personal data. We take steps to ensure that the personal data we store is protected and that our processing of it is in accordance with the applicable legislation and regulations, as well as our internal guidelines and procedures.

WHO IS COVERED BY THIS PRIVACY POLICY?

This privacy policy covers:

- **Users** of our services and apps where reference is made to this policy, as well as of our websites and digital channels.
- **Contact person** for a customer, supplier, or partner of Awaio.
- **External parties** who have contact with or otherwise communicate with Awaio.

WHO IS RESPONSIBLE FOR THE PROCESSING OF PERSONAL DATA?

Awaio is responsible for the processing of personal data.

WHERE DO WE COLLECT PERSONAL DATA FROM?

We collect personal data from:

You

We collect personal data from you when, for example, create a user account in our apps, use our apps and services, contact us, visit our websites or other digital channels, sign up for an event or take part in a survey.

Social networking platforms

If you visit our channels on social networking platforms (e.g. Facebook or LinkedIn), we collect the personal data you provide to us via these channels.

Partners

We can collect your personal data from partners, such as when we charge our services or we carry out an event or other activity together with such a partner.

Publicly available sources

We can collect your personal data from publicly available sources, such as websites, various registers, and databases.

External parties

We can also collect personal data about you from external parties that provide us with your personal data, such as in connection with communication.

WHY DO WE PROCESS YOUR PERSONAL DATA?

Below is a list of the purposes for which we process personal data. Not all of the processing may apply to you, as this depends on the type of relationship you have with us. Please see the section above on who is covered by this privacy policy. To find out more about the categories of personal data we process and the legal basis for this processing for each purpose, please see our detailed information on our processing of personal data.

Providing our apps and services

If you have registered a user account for an app or a service provided by Awaio which makes reference to this policy we process your personal data to provide the app or service to you, e.g. in order to give you access to the app or service and in order to manage your user account. You need to provide the

information we request when you register your user account. If not, you may be unable to use the app or service.

Communicating about our apps and services

If you use our apps and services, we process your personal data to communicate with you regarding these apps and services, such as to inform you about updates to the app or service, to provide operational information, or to answer questions that you have about the app or service.

Processing orders of services

When you order services, we process your personal data for the purposes of e.g. registering the order and communicating with you regarding the order.

Managing payments

When you pay for our services, we process your personal data for the purposes of e.g. register payments and communicating with you regarding the payment.

Managing the customer or supplier relationship

If you are the contact person for a customer, supplier, or partner to Awaio, we process your personal data in order to manage the customer or supplier relationship or co-operation, such as in order to register you as a contact person, manage and archive agreements, and administer invoices.

Following up and evaluating the customer or supplier relationship

We process the personal data of contact people for a customer, supplier, or partner to Awaio where this is necessary for following up and evaluating customer or supplier relationships or co-operation.

Communication between employees and external parties

In connection with communication, such as by e-mail and between employees and external parties, we process your personal data when applicable.

Communicating what we offer and providing offers via various channels

We process your personal data to provide you with offers and tailored communication from us and our partners via various digital channels, such as via e-mail or on social media. You can unsubscribe from mailings at any time by clicking on the unsubscribe link in these mailings. For this purpose, some

profiling of your data may take place by analysing your use of our websites, digital channels, apps, and services.

Managing our newsletters

We process your personal data to manage our newsletter, e.g. in order to send out the newsletter. You can unsubscribe from mailings at any time by clicking on the unsubscribe link in the newsletter.

Carrying out events, and other activities

When you sign up for an event, or other activity that we arrange, we process your personal data in order to carry out the event, or activity, such as to register your participation or to communicate with you about the event, or activity.

Answering questions

If you contact us, such as by e-mail or phone, we process the personal data you provide us with in order to answer your question.

Conducting surveys

We process your personal data if you take part in a survey that we carry out, such as in our digital channels or mailings, for the purpose of collecting your views on our business, products, and services.

Enabling functionality on our websites

We process your personal data where this is necessary in order to provide functionality on our websites, such as in order to remember your settings. This enables us to provide a better user experience on our websites.

Following up and evaluating the use of our apps and services, websites and digital channels

If you use our apps and services, websites or digital channels that make reference to this policy, we use your personal data in order to follow up and evaluate the use of our apps, and services and digital

channels, such as in order to collect and analyse visitor and user statistics on how you use our, apps, and services and websites and digital channels.

Recording phone calls for training and quality purposes

If you contact us by phone we can, if applicable, record the phone call for training and quality purposes. In such cases, you will be informed about this when you call and can choose to opt out of having your call recorded for this purpose.

Ensuring necessary technical functionality and security

We use your personal data to ensure the necessary technical functionality and security of our and services and apps and websites, such as for security logging, error handling, and backups.

Managing and defending legal claims

We process your personal data if this is necessary in order to manage and defend legal claims, such as in connection with a dispute or a lawsuit. For this purpose, we may share certain information with other recipients. Please see below for more information.

Fulfilling legal obligations

In order to fulfil our legal obligations, if necessary we will process your personal data, for example, in order to fulfil accounting or data protection obligations. For this purpose, we may share certain information with other recipients. Please see below for more information.

WHICH RECIPIENTS DO WE SHARE PERSONAL DATA WITH?

When necessary, we share your personal data with different recipients. You can find out more about the categories of personal data we share and the legal basis for doing so in relation to the various recipients in our detailed information on our processing of your personal data.

Partners

If you choose to pay for a service or function via invoice, we may receive data from our payment partners so that we can send invoices, process your payment and provide you with what you have paid for.

In connection with events and other activities, we share personal data with the partners we are organising the activity with.

Social networking platforms

We use various social networking platforms in order to, for example, communicate what we offer or to provide information about our apps and services. In connection with this, we share certain information with these platforms.

External parties

When communicating with external parties, such as by e-mail, we share personal data disclosed to them by you or another party.

Service providers

In order to process personal data, we share personal data with service providers that we have engaged. These service providers provide, for example, IT services (e.g. storage) and communication services (which enable us to send you messages and newsletters). When the service providers process personal data on our behalf, they act as data processors for us, and we are responsible for the processing of your

personal data. They must not use your personal data for their own purposes and are contractually and legally obliged to protect your personal data.

Other recipients

In some cases, when necessary, we share your personal data with other recipients for certain purposes:

- to manage and defend legal claims
- to fulfil legal obligations
- to respond to a lawful request.

Examples of recipients are external advisors, public authorities, courts, the police, and potential buyers and sellers should we sell the business.

WHAT RIGHTS DO YOU HAVE?

You have certain rights under current data protection legislation in relation to the personal data we have collected about you.

You have the right to:

- **Request access** to and a copy of the personal data we hold on you.
- **Request rectification** of personal data that you believe is incorrect or incomplete.
- **Withdraw your consent** to our processing of your personal data based on your consent.
- **Request erasure** in some circumstances, but not in cases where, for example, we are legally obligated to retain such data.
- **Unsubscribe from marketing and mailings**, such as by clicking on an unsubscribe link in a mailing.
- **Request that the processing of your personal data be restricted** in certain circumstances.
- **Object to processing** which is based on our or another party's legitimate interests for reasons related to your specific situation.
- **Transfer your data (data portability)** under certain circumstances by requesting a copy of the personal data we hold on you in a structured format (data portability) that you can transfer to another recipient.

If you wish to exercise your rights, please contact us using the contact details below.

WHERE WE PROCESS PERSONAL DATA

We always endeavour to store personal data within the EU. In some cases your personal data is shared with recipients outside the EU/EEA, such as to service providers engaged by us.

To protect personal data, we ensure that there are appropriate security measures in place with all service providers processing your personal data outside the EU/EEA by way of data transfer agreements, for example.

If you wish to know which non-EU/EEA countries your personal data is transferred to and the safeguards that we have taken to protect your personal data, please contact us using the contact details below.

WE PROTECT YOUR PERSONAL DATA

We are committed to protecting personal data. We take appropriate technical and organizational measures to ensure the protection of your personal data. We have implemented various policies to protect against unauthorized access and unnecessary storage of personal data in our systems.

Your password protects your user account. We recommend that you use a strong password that is uniquely used for your Awaio account, never share your password with anyone, restrict access to your computer and browser, and that you log out after using our services.

UPDATES TO THIS PRIVACY POLICY

We may update this privacy policy from time to time. For example, we can collect additional information or use information for purposes other than those specified in the text. In such cases, we will notify you in advance by appropriate means, such as by showing a message on the website or by e-mail. The latest version of the privacy policy is always available on this page.

QUESTIONS?

Should you have questions about this policy or our processing of your personal data, or should you wish to invoke any of your rights, please feel free to contact us. You can find the contact details for Awaio in the table below. Should you not be happy with the answers you receive, you have the right to lodge a complaint with the supervisory authority (the Swedish Data Protection Authority).

Company	Contact information
Awaio AB Corporate identity number 559257-9832	Address: Östra Storgatan 9, 553 21 Jonkoping E-mail: Contact@awaio.com

DETAILED INFORMATION ON THE PROCESSING OF PERSONAL DATA

WHEN WE PROCESS YOUR PERSONAL DATA

See below for detailed information on the categories of personal data we process, the legal basis for this processing, and how long we store the data for each purpose.

Providing our apps and services

Personal data

- Identity information
- Communication
- Contact information
- Organisational information
- Profile data
- Technical data

Legal basis

Fulfilment of agreements. Processing is necessary in order to fulfil the applicable terms for the app or service.

Retention period: Personal data is retained for this purpose for as long as your user account is active, after which the data is deleted.

Communicating about our apps and services

Personal data

- Identity information
- Contact information
- Profile data
- Technical data

Legal basis

Fulfilment of agreements. Processing is necessary in order to fulfil the applicable terms for the app or service.

Retention period: Personal data is retained for this purpose for as long as your user account is active, after which the data is deleted.

Processing orders of services

Personal data

- Identity information
- Communication
- Contact information
- Order information
- Organisational information

Legal basis

Legitimate interest. Processing is necessary in order for us to fulfil our legitimate interest of managing orders of goods and services.

Fulfilment of agreements. If the order is made by an individual firm, we process the data to fulfil our agreement with you.

Retention period: Personal data is retained for this purpose for as long as is necessary in order to process your order and for a period of 10 years thereafter in order to manage and defend legal claims. Personal data in accounting material is stored for 7 years calculated from the end of the calendar year in which the relevant financial year ended in order for us to fulfil our legal obligations (bookkeeping and accounting requirements in the Swedish Accounting Act (1999:1078)).

Managing the customer or supplier relationship

Personal data

- Identity information
- Communication
- Contact information
- Payment and purchase information
- Order information
- Organisational information

Legal basis

Legitimate interest. Processing is necessary in order for us to fulfil our legitimate interest of managing our customer or supplier relationships.

Fulfilment of agreements. If the agreement has been concluded with an individual company, we process the data to fulfil our agreement with you.

Retention period: Personal data is retained for the period of the customer or supplier relationship and for a period of 10 years thereafter in order to manage and defend legal claims.

Following up and evaluating the customer or supplier relationship

Personal data

- Identity information
- Order information
- Organisational information

Legal basis

Legitimate interest. Processing is necessary in order for us to fulfil our legitimate interest of following up on and evaluating our customer or supplier relationships or collaborations.

Retention period: Personal data is retained for the period required for it to be de-identified in order to produce statistics. Statistics which do not contain personal data are stored indefinitely or until the statistics are deleted.

Communication between employees and external parties

Personal data

- Identity information
- Audio and video material
- Communication
- Contact information
- Order information
- Organisational information

Legal basis

Legitimate interest. Processing is necessary in order for us to fulfil our legitimate interest of facilitating business communication between employees and external parties.

Retention period: Personal data is retained for this purpose for a period of 1 year calculated from the most recent communication in each conversation and thereafter for a period of 10 years in order for us to fulfil our legitimate interest of managing and defending any legal claims,.

Communicating what we offer and providing offers via various channels

Personal data

- User-generated data
- Audio and video material
- Identity information
- Contact information
- Order information
- Technical data

Legal basis

Legitimate interest. Processing is necessary in order for us to fulfil our legitimate interest of communicating and distributing offers, via various channels, regarding our services.

Retention period: Personal data is retained for this purpose throughout the customer relationship and for a period of 12 months thereafter in order for us to fulfil our legitimate interest of re-recruitment. If there is no customer relationship, the data is retained for this purpose for a period of 3 months calculated from when the data was collected.

Managing our newsletters

Personal data

- Identity information
- Contact information

Legal basis

Legitimate interest. Processing is necessary in order for us to fulfil our legitimate interest of managing our newsletters.

Retention period: Personal data is retained for this purpose until further notice and until you unsubscribe from the newsletter.

Carrying out events, and other activities

Personal data

- Audio and video materials
- Health data
- Identity information
- Communication
- Contact information
- Organisational information

Legal basis

Legitimate interest. Processing is necessary in order for us to fulfil our legitimate interest of carrying out events, and other activities.

Explicit consent. Any special categories of personal data relating to health are processed only on the basis of your explicit consent, which is obtained when you register for an event, or an activity carried out by us.

Retention period: Personal data is retained for this purpose for the time necessary to carry out the activity and for a period of 12 months thereafter to fulfil our legitimate interest in following up and evaluating the activity, as well as to invite you to new activities. Personal data in accounting material is stored for 7 years calculated from the end of the calendar year in which the relevant financial year ended in order for us to fulfil our legal obligations (bookkeeping and accounting requirements in the Swedish Accounting Act (1999:1078)). Any health information collected for this purpose is retained only for the period necessary in order to carry out the activity and is subsequently deleted. Audio and video material that is collected is retained until further notice and until the material is deleted if this is necessary for us to fulfil our legitimate interest of documenting the activity.

Answering questions

Personal data

- Identity information
- Communication
- Contact information
- Order information
- Organisational information

Legal basis

Legitimate interest. Processing is necessary in order for us to fulfil our legitimate interest of responding to your question.

Retention period: Personal data is retained for this purpose throughout the customer relationship and for a period of 10 years thereafter in order to manage and defend legal claims. If there is no customer relationship, personal data is retained for this purpose for a period of one month from the most recent communication in each conversation.

Conducting surveys

Personal data

- Identity information
- Contact information

Legal basis

Legitimate interest. Processing is necessary in order for us to fulfil our legitimate interest of carrying out surveys for the purpose of collecting your views on our business and services.

Retention period: Personal data is retained for this purpose during the period that the survey is carried out and for a period of 3 months thereafter in order for us to compile the responses in a report. Statistics which do not contain personal data are stored indefinitely or until the statistics are deleted.

Enabling functionality on our websites

Personal data

- Technical data

Legal basis

Legitimate interest. Processing is necessary in order to fulfil our legitimate interest of enabling the functionality of our websites for the purpose of providing a better user experience.

Retention period: Personal data is retained for this purpose throughout your visit and for a period of 12 months thereafter in order for us to fulfil our legitimate interest of providing a better user experience.

Following up and evaluating the use of our websites, digital channels, apps, and services

Personal data

- User-generated data
- Technical data

Legal basis

Legitimate interest. Processing is necessary in order for us to fulfil our legitimate interest of following up on and evaluating the use of our websites, digital channels, apps, and services.

Retention period: Personal data is retained for this purpose for a period of 3 months. Statistics which do not contain personal data are stored indefinitely or until the statistics are deleted.

Recording phone calls for training and quality purposes

Personal data

- Audio and video materials
- Identity information
- Communication
- Contact information
- Organisational information

Legal basis

Legitimate interest. Processing is necessary in order for us to fulfil our legitimate interest of ensuring the necessary technical functionality of our websites, apps, and services.

Retention period: Personal data is retained for this purpose for a period of 1 month from the time of the conversation.

Ensuring necessary technical functionality and security

Personal data

All relevant categories of personal data.

Legal basis

Legitimate interest. Processing is necessary in order for us to fulfil our legitimate interest of ensuring the necessary technical functionality and security of our websites, apps, and services.

Retention period: Personal data is retained for this purpose for as long as your user account is active. Personal data in logs is retained in order to fulfil our legitimate interest of troubleshooting and incident management for a period of 12 months from the log entry time.

Managing and defending legal claims

Personal data

All categories of personal data that are necessary for managing and defending a legal claim in an individual case.

Legal basis

Legitimate interest. Processing is necessary in order for us to fulfil our legitimate interest of managing and defending legal claims.

Retention period: Personal data is retained for the period required in order for us to manage and defend the legal claim.

Fulfilling legal obligations

Personal data

All categories of personal data as are necessary for fulfilling the legal obligation.

Legal basis

Fulfilling a legal obligation. Processing is necessary in order for us to fulfil our legal obligations.

Retention period: Personal data is retained for the period required in order for us to fulfil each of our legal obligations. By way of example, personal data in accounting material is retained for 7 years from the end of the calendar year in which the relevant financial year ended in accordance with the Swedish Accounting Act (1999:1078).

WHEN WE SHARE YOUR PERSONAL DATA WITH DIFFERENT RECIPIENTS

See below for detailed information on the categories of personal data we share with different categories of recipients for various purposes and on which legal basis we do this.

Partners

Carrying out events, and other activities

Personal data

- Identity information
- Communication
- Contact information
- Organisational information

Legal basis for the transfer

Legitimate interest. Processing is necessary in order for us to fulfil our legitimate interest of carrying out events, and other activities.

Social networking platforms

Communicating what we offer and providing offers via various channels

Personal data

- User-generated data
- Identity information
- Contact information
- Technical data

Legal basis for the transfer

Legitimate interest. Processing is necessary in order for us to fulfil our legitimate interest of communicating and distributing offers, via various channels, regarding our services.

Communicating about our apps and services

Personal data

- Identity information
- Contact information
- Technical data

Legal basis for the transfer

Legitimate interest. Processing is necessary in order for us to fulfil our legitimate interest of communicating about our apps and services.

External parties

Communication between employees and external parties

Personal data

- Identity information
- Audio and video material
- Communication
- Contact information
- Order information
- Organisational information

Legal basis for the transfer

Legitimate interest. Processing is necessary in order for us to fulfil our legitimate interest of facilitating business communication between employees and external parties.

Other recipients

Purpose

Managing and defending legal claims

Only the personal data that is necessary for this purpose is shared with the recipient.

Fulfilling legal obligations

Only the personal data that is necessary for this purpose is shared with the recipient.

To respond to a legal request

Only the personal data that is necessary for this purpose is shared with the recipient.

Legal basis for the transfer

Legitimate interest. Processing is necessary in order for us to fulfil our legitimate interest of managing and defending legal claims.

Fulfilling a legal obligation. Processing is necessary in order for us to fulfil our legal obligations.

Legitimate interest or to fulfil a legal obligation. To the extent that we are obliged to respond to a legal request, personal data is processed in order to fulfil this legal obligation. Otherwise, processing is based on a balance of interests when it is necessary to fulfil our and the requester's legitimate interest in our responding to the enquiry.

CATEGORIES OF PERSONAL DATA

In the table below you will find further information on the categories of personal data we process.

Category of data

User-generated data

Data that you provide when using our apps, and services and websites and digital channels.

Audio and video materials

Data such as your image when photographed or your voice when recorded.

Health data

Data on your health.

Example of data

Data on clicks, visits, and your behaviour on our websites, digital channels, apps, and services.

Photography, film, audio file.

Allergies or other intolerances.

Category of data*Identity information*

Data that makes it possible to identify you.

Communication

Data included in communications with us.

Contact information

Data that enables us to contact you.

Payment and purchase information

Data

Order information

Data on an ordered service.

Organisational information

Data related to your organisation.

Profile data

Data about your user profile when using our apps and services.

Technical data

Technical data related to the device you use when using our apps, and services and websites.

Example of data

Name, personal identity number, username, IP address.

E-mail content.

Address, phone number, e-mail address.

Name, date of birth, expiry date and certain figures from your card number, address, phone number and purchase information and transaction history.

Service, delivery time, price.

Title, name of company or organisation, address of the person or organisation.

Profile settings.

App version, device information, operating system, browser, screen size, internet connection.