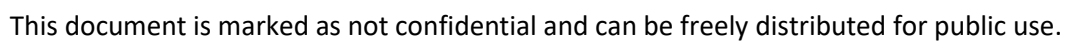


Interverbum Technology AB



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1. Version Control

Date	User	Section	Content	Version
25/05/18	G. Sjögren	All	Document creation.	v1.0
03/12/18	G. Sjögren	All	First English translation.	V1.1
19/05/19	G. Sjögren	All	Updates to Definitions.	V1.2
22/10/24	G. Sjögren	All, 2.3, 4.2.	Inclusion of Version Control. Implementation of section “2.3. Acronyms / Definitions”. Update to document format. Added Section “4.2 SLA”.	V2.0
02/06/25	G.Sjögren	All, 2.3, 6.	Reworded “Client” to “Customer”. Updated definition of “Customer”. Reworded “reduce to “infringe on”.	V2.1

2. Introduction

2.1. Purpose

Interverbum Technology AB is committed to protecting the integrity of customers' and users personal data. We will endeavor to be clear and transparent about what personal data we collect and how we process it.

We endeavor to assure that all personal data is collected and processed in accordance with Swedish and EU data management legislation.

2.2. Scope

This policy document describes the following:

- What personal data ("personal information") we collect and handle in our relationship with you as a Customer or User,
- where we gather data from,
- how we handle the data,
- how we store the data,
- whether and how we transfer and/or share the data with,
- how we handle your rights to the protection of your personal data,
- how we follow the data protection regulations.

2.3. Acronyms / Definitions

Common terms and acronyms that may be used throughout this document.

CEO – The Chief Executive Officer is responsible for the overall privacy and security practices of the company.

CO – The Confidentiality Officer is responsible for annual security training of all staff on confidentiality issues and personal data handling.

DPO – The Data Privacy Officer is chiefly responsible for data privacy policy implementation and compliance, as defined by the GDPR.

CST – The InterverbumTech Confidentiality / Security Team. This committee consists of the positions within the Business with the highest responsibility for the overall security policy planning of the organization: currently the CEO, HOD, CO and DPO.

Customer – Customer designated employees that are provided authority for any business engagements with our company.

Consent – Valid legal consent as defined in Article 7 and specified further in recital 32 of the GDPR.

Competent authority - A competent authority means: a person specified in Schedule 7 of the DPA 2018; or. any other person if, and to the extent that, they have statutory functions to exercise public authority or public powers for the law enforcement purposes.

Customer Data – Any sensitive data related to a customer.

GDPR – The “General Data Protection Regulation” as provisioned by the European Data Protection Regulation and all summary updates to these regulations.

Employee – Any Interverbum Technology personnel whether employed as a direct Employee or a Consultant.

Encryption – The process of transforming information, using an algorithm, to make it unreadable to anyone other than authorized employees or intended recipients.

EU - The European Parliament and Council of the European Union.

NIST standards – A framework of IT Security recommendations and best practices made by The National Institute of Standards and Technology.

Sensitive data – Sensitive data includes, but is not limited to, all customer information, financial data, Business proprietary information, and Personal Data.

SLA – Service level agreement refers to a document that outlines the commitment between a service provider and a customer, including details of the service, the standards the provider must adhere to.

User – Any natural person that engages in business with our company in a form that requires consent, such as requiring authorization to access an information resource or emailing us concerning a service.

Personal Data - Personal Data is a combination of any data elements which are related to an identified or identifiable natural person. *Please review applicable GDPR guidelines to determine what definition of Personal Information is applicable for purposes of the document.*

IMY – The Swedish Authority for Privacy Protection is a Swedish government agency and considered the competent authority for data privacy legislation in Sweden.

2.4. Data Controller

Interverbum Technology AB (also known as “the Business”, “we”, “us”, “our” or “InterverbumTech” in this policy) is the Data Controller of all personal information collected and used by InterverbumTech employees in accordance with the regulations set down by the IMY and EU.

2.5. Home office

InterverbumTech’s home office is registered in Stockholm, Sweden with VAT-number SE556570492001.

2.6. Data Privacy Officer

The Business has established a Data Privacy Officer as required by the GDPR by the EU. The Data Privacy Officer will oversee all ongoing activities related to the development, implementation, and maintenance of the Business privacy policies in accordance with applicable EU and federal laws.

The Data Privacy Officer (DPO) is also chiefly responsible for maintaining a log of all matters regarding sensitive data. This includes security enhancements and features that have been implemented to further protect all sensitive data, possible vulnerabilities regarding sensitive data, records regarding requests and complaints received from Customers and Users, and any reports regarding possible attempts at breaching or breaches of personal data. This log will also be reviewed during the quarterly meetings with the CST.

The current Data Privacy Officer for the Business is:

Gustaf Sjögren - +46 76 004 5710, dpo@interverbumtech.com

3. Personal data collection, processing, storage and disclosure

3.1. Collection and processing

Personal data is any and all information that directly or indirectly (i.e. together with other information) can be linked to a Customer or User; e.g. name, image, official personal identification number, and purchase or billing history. We will always process your personal data using applicable data protection laws. This means that each process has to have a so-called legal basis. Most processes are performed to enable us to provide a service, i.e. fulfill a contract with you or because we have a legal obligation.

When you sign a contract or otherwise engage in business with us, we process:

- Written or verbal information you provide to us with consent, such as: name, official personal identification number, payment details, telephone number and e-mail address.

This personal data is only used in order to:

- Manage our customer relationship with you, such as; to identify you as a User, Customer or handle payments for the services we provide for you.
- Handle and deliver any service or service-related matter in accordance with our contractual agreement.
- Notify you of changes or in your services or contract.

3.2. Storage

Your personal information is only stored for as long as it is required to fulfill the purpose of a process or as long as we have to, by law, store them.

Personal data is automatically deleted from our records in accordance with our current security policy:

- Personal data is stored for as long as you are a Customer or User with us and thereafter removed within 1 month from the final termination date of our customer contract.
- Billing and accounting information is stored as long as required in accordance with applicable accounting laws and no more than 1 year thereafter.
- If a User is a newsletter recipient, your data will be saved after initial consent for up to 1 year. Renewed consent will extend this by up to 1 year.

3.3. Disclosure

We may need disclose your personal information to the following recipients:

- External partners, both in- and outside the EU / EEA, in order to provide the ordered services.
- Competent authorities as required by Swedish or EU law.

Consent from a Customer or User is required before any and all personal information is disclosed to our external partners. Customers will also be informed if and when we are required by Swedish or EU law to disclose personal information to a competent authority such as; disclosing breaches of personal information to the Swedish Data Protection Authority.

Companies that act as a Data Processor, must always enter into a so-called personal data-sharing agreement with us in order to ensure a high level of protection of your personal data with our partners.

If we use partners and / or suppliers outside the EU / EEA, we will take special safety measures such as; signed privacy agreements and agreements that include the standardized data transfer clauses adopted by the EU Commission and available on the EU Commission website.

4. Protection

4.1. How do we protect your personal information?

We protect the integrity of the users of our services with technical and organizational measures.

To ensure the secure transfer of personal data, we enforce the use of the encryption protocol according to NIST standards. All personal data (name, address, payment details, etc.) must be encrypted both in transfer and in-rest.

Organizational measures are outlined in the ISP in accordance to ISO-27001 standards. The ISP is available to our Customers upon request.

4.2. SLA

Customer signed SLA's may improve upon but not reduce or remove the rights or protection as provided by this policy.

5. Data Protection rights

5.1. Data Protection Officer

InterverbumTech has appointed a Data Protection Officer to monitor compliance with this policy. Any Customer or User is entitled to make a complaint to the DPO or competent authority at any time. Any complaint can be made anonymously.

The Swedish Data Protection Authority ("Datainspektionen") has direct legal authority for InterverbumTech, as part of the Swedish Registry Management, in matters pertaining to breaches and compliance with this privacy policy.

5.2. Data Protection rights

All Customers and Users have the right to:

- Ask whether we have personal information about you, and if so, what personal information we have and why we have / use it.
- Request access to your personal information (commonly known as a "request for database access"). This allows you to get a copy of the personal information we hold about you and make sure we treat it legally.
- Request correction of the personal information we hold about you. This will allow you to correct any and all incomplete or incorrect personal information we keep about you.
- Request removal of your personal information. You also have the right to ask us to entirely remove or delete your personal information where you have exercised your right to object to handling (see below).
- Request a limitation on the handling of your personal information. In this way, you may ask us to pause or cancel the handling of personal information about you, for example, if you wish to determine its correctness or the purpose for which it is being processed.

- Request the transfer of your personal information in an electronic and structured form to you or to another party (commonly known as the right to "data portability"). This allows you to receive your personal information from us in a standard data format.
- Revoke consent. Under certain circumstances, in which you may have consented to the collection, handling and transfer of your personal information for a particular purpose, you are entitled to withdraw your consent for the specific handling at any time. Once we have received a notification of your revoked consent, we will no longer process your information for the purpose you originally agreed upon, unless we have another legitimate reason for doing so by law.

If you wish to exercise any of these rights, please contact our DPO by written mail addressed to our home office or by email to dpo@interverbumtech.com.

You are not required to pay a fee to exercise any of these rights. However, we may charge a reasonable fee if your request is clearly unfounded or excessive. Alternatively, we may refuse to follow a request in such cases.

The DPO may require specific information from you to help us confirm your identity and ensure that you have the right to access your personal data (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal data is not disclosed to someone who is not entitled to receive it.

6. Changes or updates to this policy

As Swedish and EU law are changed and security measures improved, this document may need to be amended.

Any changes made to this content that would in any way infringe on or remove personal data rights or protection require us to notify you as a Customer via email of this change.

This specific document has been translated, in good faith, for the use of our English-speaking customers. Please note that the original Swedish version of this document may supersede this specific document in legal authority in regard to the IMY and Swedish law.