

# **Privacy Policy**

This Privacy Policy, together with our Terms, forms the basis for our right to process personal data and other data from you.

This Privacy Policy describes your privacy rights regarding the information we collect from you, how it may be used, and how we protect it. This Privacy Policy shall apply to the use of our Proposal Service Expandra ("The Service") created and maintained by Expandra AB.

By using or accessing the Service, you are accepting the personal data handling practices and our cookies policy described in this Privacy Policy. If you represent a legal entity, you ensure and are responsible for making your physical representatives, employees, etc., aware of the contents stated herein.

#### 1. Definitions

"Company", "we," "us," or "our" refers to Expandra AB, a company registered under the laws of Sweden, with company registration number 556723-2243.

"The Service" refers to our websites including expandra.com and any product created and maintained by Expandra AB. That includes our Proposal Service Expandra.

"You" refers to the legal entity registered as the company purchasing a subscription of the Service. Where applicable and depending on the context, "you" also refers to the individual user of the Service.

"visitor" means a visitor to the website.

"Terms" means our Terms of Service, which can be found on the website.

"personal data" means any

information about you from which you are directly or indirectly personally identifiable.

"Part" or "parties" refers to either you or us or both of us.

#### 2. Collection of Personal Data

When signing up as a user of the Service, you will be asked to provide us with certain personal data, such as your name, email address, profile picture, phone number or any other information that you may provide voluntarily. The legal identity, may also provide us with some information about you in order to set up your account and send you an invitation to use the Service.

#### 3. Responsibility for Personal Data

You are the controller of the personal data provided to us and are responsible for ensuring your personal data is processed by Swedish and EU legislation. Regarding your personal data, we operate as your data assistant. In general, it means that the you decide the purpose and manner of processing your personal data and is responsible for its own and our processing of your personal data. If we collect and process your personal data on our own behalf, we will inform you specifically about such collection and processing.

## 4. Purposes of Processing Personal Data

We provide the Service to you and, therefore, collect and process your personal data for your purposes, per your instructions, and on your behalf. The purpose is to help us deliver the Service to you in the best way possible. Your personal data is

processed for the following purposes: - monitor, develop, and improve the website and the Services and analyze your use of the Service

- enable technical developments of, and enhance your experience of, the Service
- improve interactions with our support
- manage user content, such as created business proposals
- send you emails to inform you about the Service
- provide the Service.

# 5. Editing and Erasing Your Personal Data

You will always have the opportunity to add or edit your personal data in the Service. If you, the legal identity, cancel your account, we keep your information for the time necessary for the purposes for which it is processed. The length of time for which we retain information depends on the purposes for which we collected and used it and your choices, after which time we may delete and/or aggregate it.

#### 6. Security

We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this Privacy Policy. All personal data provided to us is stored on secure servers within the EU/EEA. Unfortunately, the transmission of any information via the internet and mobile networks is not entirely secure. Although we will do our best to protect your personal



data, we cannot guarantee the security of the personal data transmitted to the Service. Any transmission is at your own risk. However, once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorized access.

### 7. Passing on Personal Data to Third Parties

Except as expressly stated herein or in the Terms, we will not sell, share, or rent your personal data to any third party. We may pass on your personal data to:

- The legal identity;
- Our employees and subcontractors (such as hosting providers) facilitate, provide, and perform the Service. We may store your personal data on our hosting provider's servers and use subcontractors to perform maintenance or assist us in securing the Service. We remain responsible for our subcontractor's processing of your personal data;
- Regulatory authorities or legal advisors in connection with any alleged criminal offense or suspected breach of the Terms or where we are under a duty to disclose or share your personal data to comply with any legal obligation; and
- A limited number of third-party service providers are needed for the third-party service provider to

perform their services. Personal data is shared with our third-party service providers to the most limited extent possible. The kind of personal data shared with third-party service providers mainly consists of your name and registered email address, and the third-party service provider uses it to send you emails and alerts regarding your use of the Service.

### 8. Non-Personally-Identifiable Information

For our purposes, we will collect certain non-personally identifiable information such as your and other visitors' browser type, referring site, and the date and time of your or other visitors' visits to the website and the Service. We will collect such information in a non-personally and aggregated manner.

#### 9. Cookies

9.1 "Cookies" are passive text files stored in your or the visitor's browser to save and retrieve small amounts of information. We, and some of our third-party providers, use cookies on the website and in the Service to, for example, improve the Service, enhance the functionality of the website and the Service, enhance your and other visitor's experience of the Service and the website and to create statistics of your and other visitors' use of the website, as well as your use of the Service. We or our third-party service providers also use cookies for retargeting and advertising.

9.2 Cookies are either "session" cookies or "persistent" cookies. Session cookies allow you or the visitor to carry information across website pages without having to reenter that information. Session cookies are automatically deleted when you leave a website and go to another, or your browser is shut down. Persistent cookies allow a website to recognize you or the visitor when you or the visitor return to the website and to remember some of your or the visitor's preferences. Persistent cookies stay on your or the visitor's computer until manually deleted.

#### 10. Changes

We reserve the right to update this Privacy Policy at any time and for any reason. You will be notified of all updates in the Service or by email to your registered email address; the updated Privacy Policy will also be published on the website. All updated terms shall be effective fourteen (14) days after they are initially posted on the website. However, if we make updates that are, in our sole discretion, necessary to fulfill legal requirements, such new terms shall apply immediately after having been published on the website.

#### 11. Contact

To contact us, or if you have any questions regarding this Privacy Policy or our processing of personal data, you may email support@expandra.com