



Privacy Policy

PRIVACY POLICY

SUMMARY

General

Your privacy is very important for us at Whispr. Our aim is that you shall understand that we respect your right to privacy when we process your personal data. Therefore, we ensure that applicable law regarding data privacy is complied with when we process your personal data in our capacity as data controller.

Material scope

This Privacy Policy applies to Whispr's processing of personal data within our business in relation to you as a subscriber when you create an account through our website and then use our services.

Collected personal data

The information we collect about you is mainly the information that you provide us with when you create a user account and thereafter use our services. This information is mainly contact information and login information.

In order for us to improve our web and application services, we use cookies that may contain personal data. We only use cookies to gather basic data about how our services are being used to monitor and improve usability. We do not process any personal data and we do not keep any personal data after 12 months.

Our use and sharing of your personal data

At Whispr, we use your personal data to provide you with the services we offer in the best way possible. We use your personal data to:

- Administer and carry out our obligations towards you as subscriber, and safeguard our legal interests,
- Develop and improve our services,
- Uphold a high security for our services and prevent misuse and unauthorised usage of our services, and
- Comply with our legal obligations.

We do not use your personal data for any other incompatible purpose and we only keep your personal data for as long as necessary.

In some cases we may share your personal data with our IT services providers which may only process your personal data in accordance with our instructions. We will not sell your personal data to any third party.

Your rights

You have the right to receive information on which personal data we process about you and what we do with the data. You also have the right to a certain degree of control over your personal data. Therefore, in certain cases you have the right to receive your personal data, to have inaccurate data rectified or erased and request restriction of our processing. Furthermore, you have the right to object to the processing of your personal data. If you experience that we process your personal data in an unauthorized manner, you always are entitled to lodge a complaint with the data protection authority. If you want to read more about your rights, please read the full length version of our Privacy Policy.

Contact details

If you have any questions regarding this Privacy Policy, our processing of your personal data, or if you want to exercise your rights, you may contact us in any of the following ways:

Whispr Group Sverige AB, reg.no. 556700-6613

Postal address: Maria Skolgata 79B, SE-118 53 STOCKHOLM

Email: finance@whisprgroup.com

Telephone: +46(0)8 522 97 500

Webpage: www.whisprgroup.com

AN OVERVIEW	PRIVACY POLICY
<p>1. GENERAL</p> <p>We respect and care about your personal integrity. By way of this Privacy Policy, we want to inform you about how we ensure that your personal data is processed in the right way.</p> <p>This Privacy Policy applies to you as a subscriber when you create an account through our website and then use our services.</p>	<p>1. GENERAL</p> <p>1.1 Whispr Group Sverige AB, reg.no. 556700-6613 (“Whispr”) respects and cares about your personal integrity. We want you to feel safe when we process your personal data. By way of this privacy policy (“Privacy Policy”), we want to inform you about how we ensure that your personal data is processed in the right way</p> <p>1.2 To be able to provide you as a subscriber with our services, we must process personal data about you. This Privacy Policy applies to you as a subscriber when you create an account through our website and then use our services.</p>
<p>2. DATA CONTROLLER</p> <p>Whispr is the data controller for the processing of your personal data.</p>	<p>2. DATA CONTROLLER</p> <p>Whispr is the data controller for the processing of your personal data and is responsible for ensuring that the processing is made in compliance with applicable law. You find our contact details at the last page of this Privacy Policy.</p>
<p>3. OUR PROCESSING OF YOUR PERSONAL DATA</p> <p>At Whispr, we process your personal data to administer and carry out our obligations towards you as subscriber, safeguard our legal interests, develop and improve our services, uphold a high security for our services and prevent</p>	<p>3. OUR PROCESSING OF YOUR PERSONAL DATA</p> <p>3.1 At Whispr, we process your personal data to provide you with the services we offer in the best way possible. We use your personal data to:</p> <ul style="list-style-type: none"> - Administer and carry out our obligations towards you as subscriber, and safeguard our legal interests, - Develop and improve our services, - Comply with our legal obligations.

misuse and unauthorised usage of our services and to comply with our legal obligations.

3.2

In the tables below, you are provided with more information about e.g. why we process your personal data, which personal data we keep to achieve the purposes of the processing and for how long we keep your personal data.

We process your personal data to administer and carry out our obligations towards you as subscriber and provide you with support and customer services.

<p>Purpose: Administer and carry out our obligations towards you as subscriber, and safeguard our legal interests in case of a dispute.</p>		
<p align="center">Personal data:</p> <p align="center"><u>Contact information</u> such as name, address, email address and company.</p> <p align="center"><u>Login information</u> such as email address and password.</p> <p align="center"><u>Orders and payment information</u> such as order history and payment information.</p>		
<p>What we do: We process your personal data to be able to administer and provide you with our services and support. In case of a dispute regarding e.g. payment, we are entitled to process your personal data to establish, exercise or defend the legal claim.</p>	<p>Legal basis: Performance of a contract. In case the personal data relates to an affiliate of our customer, such as an employee, we base our processing on a legitimate interest. Should a dispute arise, we are entitled to process your personal data with legitimate interest as legal basis.</p>	<p>Retention period: Your personal data is kept during the entire contract period and 12 months thereafter. We may keep your personal data for a longer time period if necessary to establish, exercise or defend a legal claim in case of a dispute regarding e.g. payment.</p>
<p>Your rights: You have the right to object to processing of your personal data based upon a legitimate interest as legal basis. If you object to such processing, we will continue with the processing only if there is a compelling legitimate basis for the processing that outweighs your interest, fundamental rights or freedoms. Please see section 9 below if you want to read more about your rights.</p>		

We analyse your use of our services and carry out user evaluations to develop and improve our services.

Purpose: Develop and improve our services.		
Personal data: <u>Contact information</u> such as name and email address. <u>User patterns</u> such as information about how you use our services <u>Browsing habits and web browsing history</u> such as which of our web pages you have visited and for your long.		
<p>What we do: We process your personal data within the scope of our user satisfaction evaluations We use the result of our analysis as basis for improving, replacing or developing our existing or new services, processes or work methods with the aim of meeting yours and other subscribers' expectations and requests. We may e.g. use your personal data to improve our support or adjust our webpage in accordance with yours and other subscribers' requests. However, we want to clarify that we always, as far as possible, try to anonymise or pseudonyms your personal data to achieve this purpose.</p>	<p>Legal basis: Legitimate interest, as we assess that our interest of analysing your use of our services with the aim of improving, replacing or developing our services overrides your interest of protection of your privacy.</p>	<p>Retention period: Your personal data is kept during the entire contract period and 12 months thereafter.</p>
<p>Your rights: You have the right to object to processing of your personal data based upon a legitimate interest as legal basis. If you object to such processing, we will continue with the processing only if there is a compelling legitimate basis for the processing that outweighs your interest, fundamental rights or freedoms. Please see section 9 if you want to read more about your rights.</p>		

Purpose: Comply with our legal obligations.		
Personal data: <u>Contact information</u> such as name, personal identification number, address and email address. <u>Orders and payment information</u> such as order history and payment information.		
What we do: We process your personal data to comply with our legal obligations under applicable law, e.g. legislation regarding accounting, audit and tax.	Legal basis: Compliance with a legal obligation.	Retention period: Your personal data is kept for as long as necessary to comply with applicable legal obligation such as e.g. 7 years according to the accounting act.
Your rights: Please see section 9 below.		

4. WHERE WE COLLECT YOUR PERSONAL DATA FROM

The personal data we process about you is the information you have provided us with. We do not obtain any information from other sources.

You must provide us with certain personal data to enter into contract with us.

4. WHERE WE COLLECT YOUR PERSONAL DATA FROM

4.1 The personal data we process about you is the information you have provided us with. You provide us with information such as your name, address, email address and work place in connection with the registration of your user account. We do not obtain any information from other sources.

4.2 To be able to register a user account at whispr.com, and to enable us to provide you with our services, you must provide us with this personal data. If you do not provide us with this information that we need, we unfortunately cannot provide you with a user account or our services.

5. AUTOMATED DECISION-MAKING

5. AUTOMATED DECISION-MAKING

We do not use any automated decision-making which has significantly effects on you.

6. FOR HOW LONG TIME DO WE KEEP YOUR PERSONAL DATA?

We only keep your personal data for as long time as necessary and thereafter we remove the data from our systems. In certain cases we may have to keep your personal data for a longer time period.

6. FOR HOW LONG TIME DO WE KEEP YOUR PERSONAL DATA?

6.1 We only keep your personal data for as long time as necessary to achieve the purposes for which they were collected in accordance with this Privacy Policy. When we do not longer need your personal data, we remove the data from our systems, databases and backups. In the tables above under section 3.2 you may read more information about for how long time we keep your personal data for different purposes.

6.2 We may be required to keep your personal data for other reasons, such as to comply with legal obligations or to safeguard our legal interest, or for any other important public interest.

7. WITH WHOM DO WE SHARE

7. WITH WHOM DO WE SHARE YOUR PERSONAL DATA WITH?

YOUR PERSONAL DATA WITH?

We may share your personal data with our IT services providers.

We will not sell your personal data to any third party.

7.1

Whispr may share your personal data with third parties such as our IT services providers which we cooperate with to provide our services. These IT services providers may only process your personal data in accordance with our instructions. We may also in certain cases be required to share your personal data with public authorities or other third parties in connection with court proceedings, corporate acquisitions or similar reasons.

7.2

We will not sell your personal data to any third party.

8. WHERE DO WE PROCESS YOUR PERSONAL DATA?

We strive for only processing your personal data within the EU/EEA. In some cases, we may transfer your personal data to a country outside of the EU/EEA and we will then ensure that your personal data is protected and that the transfer is carried out in accordance with applicable law.

8.

8. WHERE DO WE PROCESS YOUR PERSONAL DATA?

8.1

Whispr strives for only processing your personal data within the EU/EEA. In some cases, we may transfer your personal data to a country outside of the EU/EEA. If personal data is transferred to any such country, we will ensure that your personal data is protected and that the transfer is carried out in accordance with applicable law.

8.2

When carrying out any transfer to a country that lacks an adequacy decision by the European Commission, we will use the standard contractual clauses issued by the European Commission as legal basis for the transfer. You find these here: http://ec.europa.eu/justice/data-protection/international-transfers/transfer/index_en.htm.

8.3

When carrying out transfers to recipients in the United States that have joined the Privacy Shield program, we use the Privacy Shield as legal basis for the transfer, which you find here: http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2016.207.01.0001.01.ENG&toc=OJ:L:2016:207:FULL.

9. YOUR RIGHTS

You may at any time contact us to exercise your rights.

You have the right to request access, rectification and erasure of your personal data. You also have the right to request that we restrict the processing of your personal data.

9. YOUR RIGHTS

9.1 Our responsibility for your rights

9.1.1 Whispr acts as the data controller responsible for ensuring that your personal data is processed in accordance with applicable law and that your rights have an impact on the processing. You may at any time contact us to exercise your rights. You find our contact details at the last page of this Privacy Policy.

9.1.2 Whispr is responsible for answering your request to exercise your rights within one month from our receipt of your request. If your request is complicated, or if we have received a large extent of requests, we are entitled to prolong our response period with two additional months. If we assess that we cannot perform the actions you have requested, we will within one month explain why and inform you about your right to lodge a complaint with the data protection authority.

9.1.3 All information and communication, and all actions we carry out, is at no cost for you. If the action you request is manifestly unfounded or excessive, we are entitled to charge you an administrative fee to provide you with the requested information or carry out the requested action, or refuse to meet your request.

9.2 Your right to access, rectification and erasure of personal data and restriction of processing

9.2.1 You have the right to request:

- a) Access to your personal data. This means that you have the right to request an abstract from our data record regarding our use of your personal data. You also have the right to request a copy of the personal information being processed at no cost. However, we may charge you a reasonable administrative fee to provide you with additional copies of the personal

data. If you make your access request by electronic means such as email, we will provide you with the information in a commonly used electronic format.

- b) Rectification of your personal data. We will at your request, or at our own initiative, rectify, anonymise, erase or complement personal data that you or we discover is inaccurate, incomplete or misleading. You also have the right to complement the personal data with additional data if relevant information is missing.
- c) Erasure of your personal data. You have the right to request that we erase your personal data if we do no longer have an acceptable reason for processing the data. Given this, erasure shall be made by us if:
 - (i) the personal data is no longer necessary for the purposes for which it was collected,
 - (ii) you object to the processing of your personal data based on our legitimate interest and there is no overriding legitimate ground for the processing,
 - (iii) the personal data has not been lawfully processed,
 - (iv) we are required to erase the personal data due to a legal obligation, or
 - (v) you are a child and we have collected the personal data in relation to the offer of information society services.

However, there might be requirements under applicable law, or other weighty reasons, that entail in that we cannot immediately erase your personal data. In such case, we will stop using your personal data for any other reasons than to comply with the applicable law, or the relevant weighty reason.

You have the right to object to such processing of your personal data based upon our legitimate interest.

You have the right to receive certain personal data in a structured, commonly

- d) Right to restrict processing: This means that we temporarily restrict the processing of your personal data. You have the right to request restriction of the processing when:
 - (i) you have requested rectification of your personal data in accordance with section 9.2.1 b) above during the time period we are verifying the accuracy of the data,
 - (ii) the processing is unlawful and you do not want the personal data to be erased,
 - (iii) Whispr, in its capacity as data controller, does no longer need the personal data for the purposes for which it was processed, but you require us to retain the information for the establishment, exercise or defence of legal claims, or
 - (iv) you have objected to our legitimate interest for the processing in accordance with section 9.3 below during the time period we determine whether the legitimate interest overrides your privacy rights.

9.2.2 At Whispr, we will take all reasonable and possible actions to notify any recipients of your personal data as set out in section 7 above regarding any rectification, erasure or restrictions carried out by us. At your request, we will also inform you of which third parties we have shared your personal data with.

9.3 Your right to object to the processing

You have the right to object to such processing of your personal data based upon our legitimate interest (please see section 3 above). If you object to such processing, we will only continue with the processing if we have a compelling legitimate reason for the processing that outweighs your interest, rights or freedoms, or unless continued processing is necessary for the establishment,

used and machine-readable format

You have the right to lodge a complaint with the data protection authority.

exercise or defence of a legal claim.

9.4 Your right to portability

You have the right to portability. This means that you have the right to receive certain of your personal data in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller. You only have this right when your personal data is processed by automated means and our legal basis for the processing is performance of a contract between you and Whispr. This means e.g. that you have the right to receive and transfer all of the personal data that you have provided us with to create a user account at Whispr.com.

9.5 Your right to lodge a complaint with the data protection authority

You have the right to lodge any complaints regarding our processing of your personal data with the data protection authority.

10. WE PROTECT YOUR PERSONAL DATA

We protect your personal data against unauthorised access, alteration and erasure.

10. WE PROTECT YOUR PERSONAL DATA

You shall always feel safe when providing us with your personal data. Therefore, Whispr has implemented appropriate security measures to protect your personal data against unauthorised access, alteration and erasure. In the case of a security breach that may significantly affect you or your personal data, e.g. when there is a risk of fraud or identity theft, we will contact you and inform you of what you can do to reduce this risk.

11. COOKIES

We use cookies to improve your user experience.

11. COOKIES

At Whispr, we use cookies at our webpage and in our services to improve your user experience. We use cookies to e.g. simplify and adjust our web and application services. We only use cookies to gather basic data about how our services are being used to monitor and improve usability. We do not process any personal data and we do not keep any personal data after 12 months. You may opt out from using cookies by disabling them in your web browser or by not accepting the cookie consent message on our webpage. You may also contact us for more information.

12. AMENDMENTS TO THIS PRIVACY POLICY

We have the right to amend this Privacy Policy and will inform you if we do so.

12. AMENDMENTS TO THIS PRIVACY POLICY

Whispr has the right to amend this Privacy Policy at any time. When we make any amendments that are not only linguistic or editorial, you will be provided with clear information of the amendments and which impact they will have on you before the amendments are effective.

13. CONTACT INFORMATION

Do not hesitate to contact us at Whispr if

13. CONTACT INFORMATION

Do not hesitate to contact us at Whispr if you have any questions regarding this

you have any questions.

Privacy Policy, our processing of your personal data, or if you want to exercise your rights.

Postal address: Maria Skolgata 79B, SE-118 53 STOCKHOLM

Email: finance@whisprgroup.com

Telephone: +46(0)8 522 97 500

Webpage: www.whisprgroup.com