

Privacy Policy (2021:2)

Updated on the 19th of October, 2021

This is a policy regulating how Palats Technology AB, corp. id. no 559301-8400 (hereinafter "Higate") processes personal data. Palatscomplies with all applicable laws concerning privacy and data protection, including but not limited to the general data protection regulation (EU) 2016/679. When you create an account with us, alternatively when you sign up for our newsletter or other marketing communication from us, you also consent to the processing of your personal data in accordance with this policy. You can withdraw your consent at any time, as a whole or in part, by contacting us. For any questions or concerns, reach us at info@palats.io

Which Personal Data Do We Collect and Process?

We collect names, addresses, e-mail addresses and telephone numbers to our customers, potential customers and others who have signed up for marketing communication from us. Palatsis the data controller for these personal data.

How Do We Store the Personal Data We Collect?

We store personal data at cloud services. Currently, we use G Suite (Google), Slack, HubSpot, Hetzner, Fortnox, Mailchimp.

For which Purposes Do We Use the Personal Data We Collect?

We process your personal data for the following purposes:

- 1. Establish and administer customer relationships
 - a. Find and communicate with contact persons (including contact persons at customers' collaboration partners which have been invited to our platform)
 - b. Create a demo account for potential customers, to be used by a physical person
 - c. Create a customer account if the customer signs up for an account d. Onboard customers, including adding users, customer dialogues etc. e. Provide our services, including when customers add other users when customers add email addresses intended to receive communication such as automatic reports etc.
 - f. Provide support
 - g. Manage invoicing and accounting
 - h. Facilitate our customer relationship in other ways.

2. General marketing purposes

- a. Sending offers and marketing material to existing and potential customers. However, we never transfer your personal data to a third party for marketing purposes, and you have the option to opt-out from receiving marketing communication from us at any time.
- b. Sending newsletters and/or other marketing communications to customers and persons who have signed up to receive such communication from us. However, we never transfer your personal data to a third party for marketing purposes, and you have the option to opt-

out from receiving such communication from us at any time. 3. Statistical purposes & further development

- a. Statistical analysis
- b. To further develop our products, services and offerings
- c. To improve our support services

Legal grounds for processing

We process personal data based on our legitimate interests and based on consent.

Specifically, our processing of personal data for the purposes of establishing and administering customer relationships (point 1. above) is based on our legitimate interests. Our processing of personal data for general marketing purposes (point 2.a. above) is also based on our legitimate interests, but, in the case of newsletters etc. (point 2.b. above), our processing is based on consent. Our processing of personal data for statistical purposes & further development (point 3. above) is based on our legitimate interests.

Furthermore, we process personal data as required by law (e.g. for accounting purposes).

How Long Do We Store the Personal Data We Collect?

For customers, we store the personal data during the time which the customer relation is active and one year thereafter, unless the customer has requested deletion of the personal data before that point in time. We store email for subscribers to our newsletters and other marketing communication for the time period during which the subscription is active. If you have opted out of receiving newsletters and marketing communication, we store information about such opt-out for the sole purpose of ensuring that we do not send you such communication which you do not wish to receive. Additionally, we may store the personal data for a longer time period as required by mandatory applicable law.

Transfer of Personal Data

In connection with the services we provide, we need to transfer personal data to third parties, and in such cases, we always enter into a data processing agreement with the data processor. In case we transfer personal data outside the EU, such transfers are made under the EU-US Privacy Shield or under the EU's standard contractual clauses. Our current service providers are:

Hetzner, hetzner.com

Read more about Hetzner's policies at hetzner.com/rechtliches, or see our Hosting description with appended Data Processing Agreement.

Your Rights

You have the right to request information about which personal data we have collected about you and the right to request that these shall be corrected or destroyed, or that the processing shall be restricted. You also have a right to data portability.

To the extent that the processing is based on consent, you can withdraw your consent at any time, as a whole or in part.

Please contact info@palats.io for all such matters.

You also have the right to lodge a complaint with the applicable data protection authority: Integritetsskyddsmyndigheten