



Privacy Policy (for website)

1. Introduction

- 1.1 This Privacy Policy (the “**Privacy Policy**”) describes how Nine Yards AB, reg. no 556652-5282 at the address Västra Hamngatan 21, 411 17 Göteborg (“**Nine Yards**”, “**we**”, “**us**” and “**our**”), process your personal data.
- 1.2 We respect and safeguard your personal integrity. We ask that you read this Privacy Policy carefully and familiarize yourself with its content. We may from time to time need to make updates or changes to this Privacy Policy.
- 1.3 You will find our contact details at the end of this Privacy Policy.

2. The content of this Privacy Policy

- 2.1 This Privacy Policy applies to the processing of personal data of visitors at Nine Yard's website <https://www.nineyards.se/>. This Privacy Policy also applies to processing which is initiated when you as customer, supplier or representative of customer or supplier, purchase our services or provide services to us and/or when you register or participate in an event we arrange. This Privacy Policy will for example include information on for what purposes we process your personal data, with what parties we share your personal data as well as information on your rights as a data subject.
- 2.2 If you want to read more about how we manage cookies on our website, please read our cookie policy <https://www.nineyards.se/cookiepolicy.html>.

3. What categories of personal data do we process, for what purpose and on what lawful basis do we base or processing activities?

3.1 How we in general process your personal data

- 3.1.1 We process your personal data in the way and for the purposes described in the tables below in this Clause 3, and we are accountable in the role as data controller for the processing activities described in each table.
- 3.1.2 We need to base each purpose on a lawful basis. A lawful basis can for example be (i) your consent to the specific processing activity, (ii) that processing is necessary for the performance of a contract to which you as data subject is party, (iii) that we, based on weighing of interests, have a legitimate interest to process your personal data, which is not overruled by your interest of not having your personal data processed. In the tables below you will find on what lawful basis we process your personal data, for what purpose we process your personal data as well as for the period in time we will keep your personal data.

Purpose	Processing activities	Categories of personal data
<p>In order to maintain, facilitate and improve the functions and user experience of our website as well as support our work on detecting and counteracting flaws, breaches and incidents.</p>	<ul style="list-style-type: none"> In order to fulfil the purpose we use analytic tools offered by third parties. The statistics created and analytic activities pursued with support of these services is conducted with use of data in aggregated form and with de-identified or anonymised data. Collection of statistics and analysis of visitor traffic on our website as well as analysis of other technical information which is generated upon visiting our website. 	<ul style="list-style-type: none"> IP-address. Other technical information which is generated upon visiting our website, such as what type of device is used, web browser used, history of visited sites including the time entry (information from used web browser, time zone of the place from which you visited our website and other information on web traffic).
<p>Lawful basis: Weighing of interests, wherein our legitimate interest is to gather information in order to maintain, facilitate and improve the functionality, content and security on our website. Gathering of information through use of cookies or other similar technologies is done on the basis of your consent, except such use which is strictly necessary to the foundational functions of our website. For more information on how we use cookies and other similar technologies, please see our cookie policy https://www.nineyards.se/cookiepolicy.html.</p>		
<p>Storage period: We process and keep information of how visitors interact with our website for a period of maximum six (6) months. In most cases, the collected personal data will be transformed into aggregated data (thus anonymised) at an earlier stage, in connection to us creating statistics.</p>		

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Purpose	Processing activities	Categories of personal data
In order to initiate a business relation with you or the company you represent.	<ul style="list-style-type: none"> Including for example communication via email regarding our business, services and current activities. 	<ul style="list-style-type: none"> First name and surname. Contact details, such as email address, phone number, location and address. Professional title as well as information about the company you represent. Information which you provide us when communicating with you.
<p>Lawful basis: Weighing of interests, wherein our legitimate interest is to create a business relation with you or the company you represent.</p>		
<p>Retention period: We process and keep your personal data for a period of six (6) months from the time of gathering the data. If a business relation is established between Nine Yards and you or the company you represent during the mentioned time period, then your personal data will be processed according to the purpose mentioned below.</p>		

Purpose	Processing activities	Categories of personal data
In order to maintain and develop our business relation with you or the company you represent.	<ul style="list-style-type: none"> Contact and communication with you in the role as contact person of any of our existing customers, partners, suppliers or business contacts in general. Administration of and communication regarding our customer-, partner- and supplier contracts as well as communication via email about our business, services and current activities. 	<ul style="list-style-type: none"> First name and surname. Contact details, such as email address, phone number, location and address. Professional title as well as information about the company you represent. Information which you provide us when communicating with you.
<p>Lawful basis: Weighing of interests, wherein our legitimate interest is to maintain and develop our business relation with you or the company you represent.</p>		
<p>Retention period: We process and keep your personal data as long as we have a business relation with you or the company you represent, however for a maximum of two (2) years from the time we last were in contact because of our business relation.</p>		

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We may however be required to keep personal data for a longer period of time for other purposes, for example for establishment, exercise or defence of legal claims. We may also need to keep personal data for a longer period of time in order to comply with legal obligations, such as matters including our bookkeeping obligations according to the bookkeeping legislation.

Purpose	Processing activities	Categories of personal data
In order to enter into or perform contractual terms between us and you or the company you represent.	<ul style="list-style-type: none"> Administration and communication in order to enter into or perform a contract with you or the company you represent. This includes for example invoicing as well as customary management, follow-up and documentation of contract related questions. 	<ul style="list-style-type: none"> First name and surname. Contact details, such as email address, phone number, location and address. Professional title as well as information about the company you represent. Information which you provide us in contract related matter, such as questions regarding agreed services.

Lawful basis: The processing is necessary in order for us to enter into and perform contracts with you or the company you represent. If you act on behalf of others, for example in the role as representative of a customer, partner or supplier of Nine Yards, then our processing is based on weighing of interests, wherein our legitimate interest is entering and performance of contracts with the company you represent.

Retention period: We process and keep your personal data as long as our contract is valid and for a maximum of two (2) years thereafter.

We may however be required to keep personal data for a longer period of time for other purposes, for example for establishment, exercise or defence of legal claims. We may also need to keep personal data for a longer period of time in order to comply with legal obligations, such as matters including our bookkeeping obligations according to the bookkeeping legislation.

Purpose	Processing activities	Categories of personal data
Direct marketing purposes.	<ul style="list-style-type: none"> Administer and send mailings via email. 	<ul style="list-style-type: none"> Email address. First name and surname.

Lawful basis: We will only send you direct marketing mailings via email if you have subscribed and registered for such mailings and thus consented to receiving them.

Retention period: We process and keep your personal data in order to administer and send direct marketing mailings as long as you do not unsubscribe (withdraw your consent) to receiving such mailings. Such unsubscription can be done whenever by using the link for unsubscription which is featured in all our mailings.

Purpose	Processing activities	Categories of personal data
Events.	<ul style="list-style-type: none"> Register, administer and perform conferences, travels, parties or other events organized by us or by/with our partners and/or customers. Communication concerning questions and information about the event. 	<ul style="list-style-type: none"> Email address. Telephone number. First name and surname. Passport details (for events outside of Sweden). Photos and videos. Health information, food allergies and other dietary preferences. Travel information.

Lawful basis:

Legitimate Interest:

We will only process your personal data to organize and carry out events that you have registered to either through us, our partners or customers. The processing is based on our legitimate interest in carrying out the event with you as a participant in accordance with your states preferences and needs.

Consent:

We only use photos and videos of you to the extent that you have agreed to such processing in a separate consent form.

We only process your health information to the extent you provide us with such information in separate consent form to be able to ensure that you get the right diet during the event and to arrange the assistance or other needs that you may need during the event.

Legal obligation:

Laws and regulations may require us to process and disclose your personal data, such as rules regarding security, bookkeeping, immigration and customs control depending on the type of event you are attending and the destination. We will only disclose your personal data if we are legally required to, or if you have approved it.

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Retention period: Your health information and dietary information will be deleted as soon as the event has taken place. For the other personal data, the personal data will be stored for up to three (3) months after the event.

We may however be required to keep personal data for a longer period of time for other purposes, for example for establishment, exercise or defence of legal claims. We may also need to keep personal data for a longer period of time in order to comply with legal obligations, such as rules regarding security, bookkeeping, immigration and customers control depending on the type of event you are attending and the destination.

3.2 To comply with our legal obligations or to exercise legal claims

3.2.1 We may process your personal data in order to comply with legal obligations according to legislation which is applicable to our operations and organisation, or to comply with a decision by public authority or court which requires us to keep and process your personal data.

3.2.2 We may also process your personal data because you or the company you represent, ourselves or affected third party shall be able to establish, exercise or defend a legal claim, for example upon forthcoming or ongoing dispute.

4. From where do we collect your personal data?

We process personal data which are collected directly from you, our partners, our customers, from the company you represent, as well as personal data which are collected via use of cookies.

5. What happens if you do not want to share your personal data with us?

It is possible that the functionality of our website becomes limited and does not work as you may expect if you choose to not accept cookies.

6. How we share your personal data

Access to your personal data is limited to parties which needs access in order to fulfil the purposes described under Clause 3 above. We will share your personal data with the following parties in order to fulfil the stipulated purposes under Clause 3 above:

(a) Suppliers of IT-services and analytic tools for our website. We use third party suppliers in order to manage parts of our business. We may share personal data with these suppliers in connection to them providing services to us. Whenever using suppliers, we establish data processor agreements as well as take other adequate measures in order to make sure that your personal data is processed in a way that conforms with this Privacy Policy.

(b) Companies within our group of companies. We may share your personal data with companies within our group of companies. If we share your personal data with companies within our group, we will make sure that your personal data is processed in a way that conforms to this Privacy Policy.

- (c) **Service Providers.** Your personal data will also be shared with other selected companies, which help us to carry out events or deliver other services. For example, photographers and catering companies. These companies may only process your personal data in accordance with our instructions or to fulfill their legal obligations. We only work with serious and carefully selected suppliers.
- (d) **Airlines, hotels and other suppliers.** Your personal data can be shared with airlines, hotels and other providers to book tickets, accommodation and other services for events, such as excursions and other activities. The personal data needed can be e.g. name, social security number, email and address to confirm bookings, but also, for example, passport information for travel where passport checks are required. Airlines and hotels are normally responsible for their processing of your personal data. You can usually find more information about their processing of your personal data on their websites. You are of course also welcome to ask us.
- (e) **Authorities.** We may need to provide necessary information to Swedish and foreign authorities such as the police, border controls or other authorities. We will only disclose your personal data to authorities if we are obliged to do so, or if you have approved it.
- (f) **Others.** We may also disclose your personal data to other companies, organizations or individuals, if you have approved it.

7. Will we transfer your personal data outside of EU/EEA?

We may transfer your personal data to countries outside of the European Union (“EU”)/European Economic Area (“EEA”). If the European Commission has not issued a decision that the country to which your personal data are transferred has an adequate level of protection for your personal data, then we will provide a description of what safeguarding measures we have taken and what lawful basis we base the transfer upon in order to ensure that the transfer of your personal data is done in accordance with European data protection legislation. Please contact us by sending us a written notice to the contact details featured in the end of this Privacy Policy if you want to have more information about whether we have transferred your personal data outside of EU/EEA, what countries we have transferred your personal data to and what safeguarding measures we have taken to protect the transfer.

8. Your rights as data subject

- 8.1 In this section we describe your rights under applicable European data protection legislation. You will not be charged if you want to exercise your rights and you can exercise them by contacting us (please see our contact details in the end of this Privacy Policy). Do not hesitate to contact us if you have any questions regarding your rights.
- 8.2 Please note that we will always do an assessment of a request of exercising a right in order to determine whether the request is legitimate. Not all rights listed below are absolute and there are exemptions which can be valid.

8.3 Your rights are the following:

- (a) **Right of access.** You have the right upon request to get a copy of your personal data which we process and to get complementary information regarding our processing of your personal data.
- (b) **Right of rectification.** You have the right to have your personal data rectified and/or complemented if they are wrong and/or incomplete.
- (c) **Right to erasure.** You have the right to request that we erase your personal data without undue delay in the following circumstances:
 - (i) the personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - (ii) you withdraw your consent on which the processing is based (if applicable) and there is no other legal ground for the processing;
 - (iii) you object to our processing of personal data and we do not have any overriding legitimate grounds for the processing;
 - (iv) the processed personal data is unlawfully processed; or
 - (v) the processed personal data has to be erased for compliance with legal obligations.
- (d) **Right to restriction.** You have the right to restrict the processing of your personal data in the following circumstances:
 - (i) You contest the accuracy of the personal data during a period enabling us to verify the accuracy of such data;
 - (ii) the processing is unlawful and you oppose erasure of the personal data and request restriction instead;
 - (iii) the personal data is no longer needed for the purposes of the processing, but are necessary for you for the establishment, exercise or defence of legal claims; or
 - (iv) you have objected to the processing of the personal data, pending the verification whether our legitimate grounds for our processing override your interests, rights and freedoms.
- (e) **Right to data portability.** If your personal data has been provided by you and our processing of your personal data is based on your consent or on the performance of a contract with you, you have the right to receive the personal data concerning you in a structured, commonly used and machine-readable format in order to transmit these to another service provider where it would be technically feasible and can be carried out by automated means.
- (f) **Right to object.** You have the general right to object to our processing of your personal data when it is based on our legitimate interest. If you object and we

believe that we may still process your personal data, we must demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims.

- (g) **Right to object to direct marketing.** You have the right to at any time object to processing which is done for the purpose of direct marketing. If you object to such processing, we will no longer process your data for such purposes.
- (h) **Right to withdraw consent.** When our processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. Please note that the lawfulness of any processing based on your consent before its withdrawal is not affected by the withdrawal.

9. **Complaints to the supervisory authority**

The data protection authority in Sweden is 'Integritetsskyddsmyndigheten'. If you believe that our processing is performed in breach of applicable data protection legislation, we encourage you in first hand to contact us in order for us to oversee your complaints. You may at any time also file a complaint at the supervisory authority.

10. **How can I come in contact with Nine Yards?**

You can contact us at any of the following addresses:

- (a) Address: Nine Yards AB, Västra Hamngatan 21, 411 17 Göteborg.
- (b) Email address: info@nineyards.se.
- (c) Website: www.nineyards.se.