

Privacy policy

Vitec Software Group AB (publ)
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(hereafter "the Company, us, we or our")

Please note that this is the applicable Privacy policy for applicants and recruitment processes at Vitec Software Group and for Customers, Suppliers and Collaborators (website visitors included) unless you have specific agreement(s) with us which differs from this policy.

1. Introduction

This data protection and privacy policy (the "**Policy**") describes how Vitec Software Group ("**us**", "**we**" or "**our**") collects and processes personal data relating to services and general use of our website.

The Policy is prepared and made available to comply with the (EU) General Data Protection. Regulation (2016/679 of 27 April 2016) (the "**GDPR**") and the rules included herein on information to be provided to you.

2. Types of personal data processed

Specific for Customers, Suppliers and Collaborators

We process personal data about you when this is necessary and in accordance with the applicable legislation. Depending on the specific circumstances, the processed personal data include the following types of personal data: name, address, telephone number, email, username, LinkedIn data, Google data, IP

We process the following types of personal data about subscribers to our pressreleases and financial reports: Name, address, and email.

When it is relevant, personal data is collected directly from you or from external sources. When personal data are not collected directly from data subjects, the

data is provided to Vitec Software Group as a data processor, where securing legal basis for processing is the data controller's responsibility.

If we need to collect more personal data than what is specified above, we will inform about this. Such information may be provided by our updating of this Policy.

There is a specific policy for applicants using Teamtailor :
<https://workwithus.vitecsoftware.com/privacy-policy>

3. Purposes for processing the personal data

Specific for Customers, Suppliers and Collaborators

We only process personal data for legitimate purposes in accordance with the GDPR. Depending on the circumstances, the personal data is processed for the following purposes:

- a. To deliver - services to a user, customer or member.
- b. To give support and service messages, including answering questions and complaints and send updates about our products and services.

Specific for Applicants

Your personal data collected and processed by us will be processed for the following purposes:

- a. To process job applications and to recruit the relevant persons.
- b. To store and process personal data to the extent that it is a requirement under applicable law, including bookkeeping in accordance with applicable law.

4. Legal basis for processing personal data

Specific for Customers, Suppliers and Collaborators

We only process your personal data when we have a legal basis to do so in accordance with the GDPR. Depending on the specific circumstances, the processing of personal data is done on the following legal basis:

- a. If we have asked for a consent for the processing of specific personal data, the legal basis for such personal data is a consent, cf. article 6(1)(a) of the GDPR, as the consent can always be withdrawn by contacting us via the contact details provided at the end of this Policy, and, if the consent is withdrawn, the personal data processed on the basis of

consent is deleted, unless it can or must be processed, for example, in order to comply with legal obligations.

- b. The processing is necessary for the performance of a contract to which the data subject is party, cf. the GDPR, article 6(1)(b), the first indent.
- c. The processing is necessary in order to take steps at the request of the data subject prior to entering into a contract, cf. the GDPR, article 6(1)(b), last indent.
- d. The processing is necessary for compliance with applicable legislation, cf. the GDPR, article 6(1).
- e. The processing is necessary for the purposes of the legitimate interests where such interests are not overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, cf. the GDPR, article 6(1)(f).

5. Erasure and retention of personal data

Specific for Customers, Suppliers and Collaborators

We ensure that the personal data is deleted when it is no longer relevant for the processing purposes as described above. We also retain personal data to the extent that it is an obligation from applicable law, as is the case with for example accounting and bookkeeping materials and records. If you have any questions about our retention of personal data, please contact the email mentioned in section 9 of this Policy.

Specific for Applicants

We ensure that the personal data is deleted when it is no longer relevant for the processing purposes as described above. We always retain personal data to the extent that it is an obligations from applicable law, as is the case with for example accounting and bookkeeping materials and records.

When the candidate becomes an employee, the employee's personal data from the application process are transferred/moved to regular HR management. If the candidate does not become an employee, the general rule is that the personal data is erased after 6 months in accordance with applicable law. Notwithstanding the above, specific reasons related to employment law may necessitate the continuous processing of the personal data. This may have different implications. For example, we may process the applications for a longer period to prove that there has been no unlawful discrimination in the selection process, when we consider this necessary. Similarly, it may be relevant to process the personal data for a limited period if a similar relevant position may become available during this period, or if another existing candidate opts out of the application process.

If you have any questions about our retention of personal data, please contact the email mentioned at the bottom of this Policy.

6. Data subject rights

6.1. Data subjects have a number of rights that we can assist with. If a data subject wants to make use of his or her rights, he or she can contact us. The rights include the following:

- The right of access: Data subjects have a right to ask for copies of the information that we process about them, including relevant additional information.
- The right to rectification: Data subjects have a right to ask for rectification of inaccurate personal data concerning him or her.
- The right to erasure: In certain circumstances data subjects have a right to obtain the erasure of personal data concerning him or her before the time when erasure would normally occur.
- The right to restrict processing: Data subjects have, in certain situations, a right to have the processing of his or her personal data restricted. If a data subject has the right to have the processing of his or her personal data restricted, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest in the European Union or of a European member state.
- The right to object: Data subjects have, in certain situations, a right to object to the legal processing of his or her personal data.
- The right to data portability: Data subjects have, in certain situations, a right to receive his or her personal data in a structured, commonly used and machine readable format and have the right to transmit those data to another data controller without hindrance from the data controller to which the personal data has been provided.

6.2. More information about data subject rights can be found in the guidelines of the national data protection authorities.

If a data subject wishes to make use of his or her rights as described above, the data subject is asked to use the contact details provided at the end of this Policy.

We strive to do everything to meet wishes regarding our processing of personal data and the rights of data subjects. If you or others despite our endeavours wish to file a complaint, this can be done by contacting the national data protection authorities.

7. Changes to this Policy

We reserve the right to update and amend this Policy. If we do, we correct the date and the version at the bottom of this Policy. In case of significant changes, we will provide notification in the form of a visible notice, for example on our website or by direct message.

8. Contact

If you have questions or comments to this Policy or if you would like to invoke one or more data subject rights, please contact us at info@vitecsoftware.com.