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# EyeonID Privacy Policy

# EyeonID Privacy Policy

This Privacy Policy describes how we, Eyeonid Group AB (“EyeonID”), with corporate registration number 559005-941, process your personal data when interacting with our Public Website or us as a company.

Our mission is to lessen the risk that you become a victim of cyber security criminality. The Service is provided via our Resellers (as defined in the general terms and conditions) while we provide a Portal (as defined in the general terms and conditions) directly to you for access and use of the Service. In order for us to provide the Portal to you, some of your personal information is being collected. Your data is protected by us through both technical and organizational measures. Processing of your personal data is subject to the provisions of EU 2016/679 General Data Protection Regulation (GDPR) and applicable national legislation. For further information on how we process personal data when providing the portal, please see Privacy Policy for our Portal.

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## Why do we inform you?

We know that your privacy and how your personal data is used is important to you. This Privacy Policy outlines in detail how we collect, process, use and transfer (collectively “process”) your personal data. In light of the volume of information in this Notice, please use the content section above to identify the areas you are most interested in.

Personal data is information that relates to an individual who can be identified from that information, together with other information or independently. Personal data processed by EyeonID in relation to our Public Website include name, telephone number and email address.

## Who is the data controller?

The data controller is EyeonID, meaning that we determine how and the reason why your personal data is processed. We have appointed a data protection officer (“DPO”) who you may contact via the contact information provided below.

## What personal data will be processed and what is the purpose of the processing?

EyeonID is a Public traded company based in Sweden that primarily works with Partners and Resellers of our service. For us to get in contact with potential new partners, create awareness around our product and keep our investors informed, we have a Public Website.

When in contact with us as a potential or current partner, investor or customer, we need to process personal data. This could be for example:

- Administering our customer relationship
- Providing you with information about the Company or the services
- Assisting you with enquiries etc. regarding the Portal
- Sales and product development/follow up
- Marketing or partnership proposal

The personal data we collect, the legal basis for our processing and the purpose of the processing are detailed below. Please note that the personal data processed may vary depending on the purpose and we always strive to process as little personal information as possible. The personal data in the table below may be processed by EyeonID as well as third party suppliers. For more information see “Who has access to the personal data” below.

Personal data	Purpose	Legal basis	When it is collected	Retention period
Email address	<p>When you contact us as a company we process your Email in order to respond.</p> <p>1) Marketing Purpose: If you leave your contact information on our contact form, we</p> <p>2) If you contact us directly with any questions, as either a current or potential partner, customer or investor</p>	Legitimate interest	<p>This data is provided from you when you contact EyeonID.</p> <p>1) When you use our contact form as a potential partner</p> <p>2) If you reach out to us through direct communication channels with any questions or inquiries over email</p>	<p>For as long as you remain a partner, as long as applicable law states if the context is applicable to such or</p> <p>1) As long as we have an ongoing discussion and one year after that</p> <p>2) Up to one year after the last contact</p>
Telephone number	<p>When you contact us as a company over the phone we process your telephone number in order to respond.</p> <p>1) Marketing Purpose: If you reach out to us as a potential customer or partner</p> <p>2) If you reach out to us with any questions, to keep in contact with partners or potential interests</p>	Legitimate interest	<p>This data is provided from you when you contact us at EyeonID.</p> <p>1) When you use our contact form as a potential partner and put in information regarding your phone number</p> <p>2) If you reach out to us with any questions or inquiries over telephone</p>	<p>For as long as you remain a partner, as long as applicable law states if the context is applicable to such or</p> <p>1) As long as we have an ongoing discussion and one year after that</p> <p>2) Up to one year after the last contact</p>

Name	<p>When you contact us as a company over the and leave your full name we process your name in together with the errand.</p> <p>1) Marketing Purpose: If you reach out to us as a potential customer or partner</p> <p>2) If you reach out to us with any questions, to keep in contact with partners or potential interests</p>	Legitimate interest	<p>This data is provided from you when you contact us at EyeonID.</p> <p>1) When you use our contact form as a potential partner and put in information regarding your name.</p> <p>2) If you reach out to us with any questions or inquiries and leave your full name</p>	<p>For as long as you remain a partner, as long as applicable law states if the context is applicable to such or</p> <p>1) As long as we have an ongoing discussion and one year after that</p> <p>2) Up to one year after the last contact</p>
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EyeonID will not be making any decisions based on automated individual decision-making, including profiling.

## Where does EyeonID obtain my personal data from?

EyeonID All data we process when interacting with our website is limited to what you provide us with by contacting us.

In some circumstances, we may request your explicit consent to process (specific types of) personal data in order to fulfill our obligations. In these circumstances, you are able to withdraw your consent at any time by following the instructions provided when you gave your consent or via the contact details below.

## How we protect your data

Your data will be thoroughly protected by both technical and organizational measures and processes to fulfill legal security requirements and guard against unauthorized access and disclosure. We do not store or process any sensitive information from customers, potential customers or partners.

## How long we retain your data

EyeonID will store your personal data in accordance with the time limits stipulated above or if you request for deletion within your rights of GDPR.

At the point of deletion, all of your personal data will be deleted from our servers except to the extent we are required by law to retain certain data.

## Who has access to the personal data?

Employers and consultancies at EyeonID

In relation to the Public Website, we at EyeonID and consultancies employed by EyeonID is the one who will have access to your data.

## Service Providers

We use third party Service providers who may provide services related to our IT and communication services. Your personal may be processed by the Service provider on our behalf.

We will control any third party that we use to ensure that they can provide sufficient guarantees regarding the confidentiality and security of your personal data.

We will have written contracts with them which provide warranties regarding the security of your personal data as well as warranties that they comply with our data security standards and international transfer restrictions.

## Disclosure to third parties

In certain circumstances, we share and/or are obliged to share your personal data with third parties outside EyeonID, for the purposes described above and in accordance with the applicable laws. These third parties include:

- Administrative authorities (tax authorities and enforcement authorities)
- Police, public prosecutors

Your personal data will never be forwarded, sold or traded with other companies, organizations or individuals.

## Where your data is being stored

We strive to store all your personal data within European Economic Area (the “EEA”). We may share your personal data with partners, subcontractors or technical service providers that are needed to provide our own service, such as email and messaging services, and they may have their staff or equipment within or outside the European Economic Area (the “EEA”). This means that your personal data may be subject to privacy laws that differ from the country you reside in. This also means that personal data collected within the EEA may be transferred to third parties in countries outside the EEA. We have put in place adequate safeguards with respect to the protection of your privacy, fundamental rights and freedoms, and the exercising of your rights. We ensure that your privacy is protected by an adequate level of data protection through EU Standard Contractual Clauses based on the EU commission’s model clauses. If you would like to see a copy of any relevant provisions, please contact us (see “Contacting us” below).



## Your rights

Eyeonid Group AB, with corporate registration number 559005-9415, is the data controller in relation to the processing of your personal data. This means that EyeonID is responsible for ensuring that your personal data is processed correctly and in accordance with applicable law.

You have various rights which you can enforce, one of them being the right to be informed in accordance with this Privacy Policy. You may for example request information on what personal data is processed about you. You also have a right to receive your personal data in a machine-readable format. You may also contact us in order to request correction of inaccurate personal data and notify us in writing that your personal data may not be used for direct marketing. Further, you may at any time request that the use of your personal data is restricted or that we shall delete your personal data. Note, however, that a restriction or deletion may restrict our possibility to engage with you.

The below table provides a summary of the rights that the law entitles you to. The table also includes information on possible conditions and limitations on how the right can be exercised and how it can be executed.

Your right	What does it mean?	How do I execute this right?	Conditions to exercise?
Right of access	You have the right to access the personal data that we have on you.	Requests for such information should be made in writing to <a href="mailto:dpo@eyeonid.com">dpo@eyeonid.com</a> . If possible, you should specify the type of information you would like to see to ensure that our disclosure meet your expectations.	We must be able to verify your identity. Your request may not affect the rights and freedoms of others, e.g. privacy and confidentiality rights of other staff.
Right of data portability	You may be entitled to receive the data which you have provided to us and which is processed by us by automated means, in a commonly-used machine readable format.	Requests should be made in writing to <a href="mailto:dpo@eyeonid.com">dpo@eyeonid.com</a> . If possible, you should specify the type of information you would like to receive to ensure that our disclosure meet your expectations.	The GDPR does not establish a general right to data portability but if the processing is based on your consent or on our contract with you and when the processing is carried out by automated means (e.g. not paper records) you can exercise this right. The right includes only personal data that you have provided to us. Hence, the right does not apply to personal data generated by us.
Rights in relation to inaccurate personal or incomplete data.	You may challenge the accuracy or completeness of personal data which we process about you. If it is found that personal data is inaccurate, you are entitled to have the inaccurate data removed, corrected or completed, as appropriate.	We encourage you to notify us of any changes regarding your personal data as soon as they occur, including changes to your contact details, telephone number, immigration status. A request to use this right is made in writing to <a href="mailto:dpo@eyeonid.com">dpo@eyeonid.com</a> .	This right only applies to your own personal data. When exercising this right, please be as specific as possible.

<p>Right to object to processing for direct marketing purposes.</p>	<p>You have the right to object to any processing performed for the purpose of direct marketing.</p>	<p>Requests should be made in writing to <a href="mailto:dpo@eyeonid.com">dpo@eyeonid.com</a></p>	<p>This right applies to all processing made for the purpose of direct marketing. When exercising this right, please be as specific as possible.</p>
<p>Right to object to or restrict our data processing of your personal data.</p>	<p>You have the right to object to or ask us to restrict the processing of your personal data.</p>	<p>Requests should be made in writing to <a href="mailto:dpo@eyeonid.com">dpo@eyeonid.com</a></p>	<p>This right applies only if the processing of your personal data is explicitly based on our so-called legitimate interests. Objections or request for restrictions must be based on grounds relating to your particular situation. This means that your request for the objection or restriction cannot be generic or too general.</p>
<p>Right to have personal data erased</p>	<p>You may be entitled to have your personal data erased (also known as the “right to be forgotten”), e.g. where you think that the information, we are processing is inaccurate, or the processing is unlawful.</p>	<p>Requests should be made in writing to <a href="mailto:dpo@eyeonid.com">dpo@eyeonid.com</a>.</p>	<p>There are various lawful reasons why we may not be in a position to erase your personal data. This may apply (i) where we have to comply with a legal obligation, (ii) in case of exercising or defending legal claims, (iii) where we have to comply with legal archiving obligations, or (iv) where the personal data is necessary for the performance of our contract with you. In the Portal, there may be a function enabling you to delete your Account and all of your personal data.</p>
<p>Right to withdrawal</p>	<p>You have the right to withdraw your consent to any processing for which you have previously given consent to.</p>	<p>Requests should be made in writing to <a href="mailto:dpo@eyeonid.com">dpo@eyeonid.com</a> or as instructed when you gave your consent.</p>	<p>If you withdraw your consent it will only take effect for the future.</p>

## Changes in the Privacy Policy

EyeonID's Privacy Policy may be amended from time to time, for information on last update of the document please see the top of this Privacy Policy.

If the change is indicative of a fundamental change to the nature of the processing (e.g. enlargement of the categories of recipients or introduction of transfers to a third country) or a change which may not be fundamental in terms of the processing, but which may be of great importance to you, then the updated Privacy Policy will be provided to you 30 days before such changes take effect. We will in this case, if possible, reach out to you via e-mail, otherwise publish them on our website so that you will be aware of the changes. When notifying you of such changes, we will also explain what the likely impact of those changes on you will be, if any.

## Contacting us

If you have any questions regarding our processing of your personal data or if you would like further information on our processing of personal data or your right, you are welcome to contact us:

Eyeonid Group AB  
Sibyllegatan 81  
114 43 Stockholm

You can contact our DPO via email: [dpo@eyeonid.com](mailto:dpo@eyeonid.com)

If you find that our processing is in breach of this Privacy Policy or applicable laws, please feel free to contact us but also know that you can always lodge an official complaint with the competent authorities, in Sweden this is Integritetsskyddsmyndigheten.

Integritetsskyddsmyndigheten

Box 8114

104 20 Stockholm

E-post: [imy@imy.se](mailto:imy@imy.se)

Växel: 08-657 61 00

[www.imy.se](http://www.imy.se)

**EYEON** id

Eyeonid Group AB (publ)  
Sibyllegatan 81  
114 43 Stockholm

dpo@eyeonid.com  
www.eyeonid.com  
Org. nr. 559005-9415