

# Eyeonid Privacy Policy

Last update: May 14 2019

*This Privacy Policy describes how we, Eyeonid Group AB, with corporate registration number 559005-9415, process your personal data when providing our Portal for access to our Service as defined and described in the general terms and conditions.*

*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 GDPR and applicable national legislation.*

## TABLE OF CONTENT

<b>Why do we inform you?</b>	1
<b>Who is the data controller?</b>	1
<b>What personal data will be processed and what is the purpose of the processing?</b>	2
<b>Where does Eyeonid obtain my personal data from?</b>	4
<b>How we protect your data</b>	5
<b>How long we retain your data</b>	5
<b>Who has access to the personal data and how long is it stored?</b>	5
<b>Where your data is being stored</b>	6
<b>Your rights</b>	6
<b>How we use cookies</b>	8
<b>Changes in the Privacy Policy</b>	8
<b>Contacting us</b>	8

## 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. Common examples of personal data processed by Eyeonid in relation to the Portal include name, user 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. If we have appointed a data protection officer (“DPO”) you may contact the DPO via the contact information provided below.

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

Eyeonid provides a Service where the Reseller chooses which of your personal data will be monitored. The Service searches the Internet for this data, and if it is detected that your personal data is detected or is suspected to be somewhere where it should not be, you will be informed in writing. The alert will, depending on your chosen way of contact, be sent out via email and/or as a text message. The Service is provided via Resellers and the processing of personal data as part of the Service is stipulated in the privacy policy provided by the relevant Reseller. This privacy policy includes information on our processing of your personal data as part of providing the Portal. In order for us to provide the Portal to you it is necessary to process your personal data, without your personal data we will be unable to provide the Portal.

We collect your personal data when you complete your registration and set up of your Account (as defined in the general terms and conditions), or when you add information to your Account.

Your data is used for example for:

- Providing you with, and managing the Portal
- Administering our customer relationship
- Providing you with information about the Portal
- Assisting you with enquiries etc. regarding the Portal
- Sales and product development/follow up
- Statistical purposes (in which case your data is not traceable to you as an individual)
- Sending newsletters to you

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 use of the Portal. The personal data in the table below may be processed by different companies within our group of companies (the “**Group**”) 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
<b>User name</b>	<p>Your user name is created to provide you with, and managing the Portal as it works as an identifier of you when we</p> <p>1) assist you with enquiries regarding the Portal</p> <p>2) develop/follow up on sales and product development</p> <p>3) gather data for Service statistics. – However, for this, your data is anonymized and not traceable back to you</p>	Our contractual obligations to you when providing the Portal	When you create the personal account, the user name is created	<p>For as long as you remain a customer with us</p> <p>The information is hashed (i.e. one-way encrypted) when stored</p>
<b>Name</b>	For a better customer experience	Either voluntary action <i>or</i> Provided by Reseller according to Reseller GTC and Privacy Policy	When you enter it into the Portal <i>or</i> When your Reseller has added you to the Service through their own systems	<p>For as long as you use any of our Services through your Reseller <i>or</i> Until you delete that data in the Portal</p>
<b>Email address</b>	<p>To deliver your chosen Service to you according to agreement</p> <p>To deliver newsletters to you</p>	According to your consent of the GTC and this Privacy Policy	<p>When you register for the Service <i>or</i> When you create a subscription in the Portal for this object</p>	<p>For as long as you remain a customer with us</p> <p>Email as contact detail is stored and encrypted in the Portal</p> <p>Email as a search object is hashed when stored</p>



<b>Telephone number</b>	To deliver your chosen Service to you according to agreement	According to your consent of the GTC and this Privacy Policy	When you create a subscription in the Portal <i>or</i> If you choose to have text message as one of your contact ways in case of a match	Phone number as a contact detail is stored and encrypted in the Portal as long as you keep phone as a way of contact  Telephone number as a search object is stored as long as the matching Service is active. The information is hashed when stored
<b>Event logs</b>	To deliver your chosen Service to you according to agreement	According to your consent of the GTC and this Privacy Policy	When an event occurs regarding the data that you have supplied in any of the ways above	When you delete your account, the event log is anonymized and all trace to you is erased
<b>Cookies</b>	Cookies and third-party website cookies are used for continuously improving the site/Service  Read more about HTTP cookies <a href="#">here</a> [link to Wikipedia]	According to your consent of the GTC and this Privacy Policy	When you are active in the Portal	You can regulate this in your browser where the data is stored

In providing the Portal, Eyeonid will not be making any decisions based on automated individual decision-making, including profiling.

## Where does Eyeonid obtain my personal data from?

Most of the personal data we process is obtained from you, but it may also be obtained from our Resellers, all as stipulated in the table above.

In some circumstances, we may request your explicit consent to process (specific types of) personal data. 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. Sensitive information will be hashed and managed in encrypted form. We are certified by PCI DSS for handling of credit card data.



## **How long we retain your data**

Eyeonid will store your personal data until you chose to delete your account or such earlier time that is stipulated in the table above. 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?**

### *Our Group Companies*

Personal data will only be shared across the Group in certain circumstances and where it is lawful to do so. It may be necessary to share your personal data with other members of the Group, which includes a potential holding company and its subsidiaries for the purposes of our business management. Access rights between members of the Group are limited and granted only on a need to know basis, depending on job functions and roles.

### *Service Providers*

We use third party Service providers who may provide Services including IT Services, audit and security Services. In providing the Services, your personal data will, where applicable, 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 the Group, for the purposes described above and in accordance with the applicable laws. These third parties include:

- administrative authorities (tax authorities and enforcement authorities)
- financial institutions
- insurance providers
- police, public prosecutors
- external advisors

Your personal data will never be forwarded, sold, traded or shared with other companies, organizations or individuals without your consent.

## **Where your data is being stored**

We may share your personal data with other companies within the Group or with Service providers which 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 for example EU Standard Contractual Clauses based on the EU commission’s model clauses or Privacy Shield. If you would like to see a copy of any relevant provisions, please contact us (see “**Questions and queries**” 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 mean that Eyeonid is not able to provide you with Services in accordance with your wishes.

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:support@eyeonid.com">support@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:support@eyeonid.com">support@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	This right only applies to your own personal data. When exercising this right, please be as specific as possible.

		use this right is made in writing to <a href="mailto:support@eyeonid.com">support@eyeonid.com</a> .	
Right to object to processing for direct marketing purposes.	You have the right to object to any processing performed for the purpose of direct marketing.	Requests should be made in writing to <a href="mailto:support@eyeonid.com">support@eyeonid.com</a> .	This right applies to all processing made for the purpose of direct marketing. When exercising this right, please be as specific as possible.
Right to object to or restrict our data processing of your personal data.	You have the right to object to or ask us to restrict the processing of your personal data.	Requests should be made in writing to <a href="mailto:support@eyeonid.com">support@eyeonid.com</a> .	This right applies only if the processing of your personal data is explicitly based on our so-called legitimate interests (see " <b>How and why do we process your personal data?</b> " above). 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.
Right to have personal data erased	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.	Requests should be made in writing to <a href="mailto:support@eyeonid.com">support@eyeonid.com</a> .	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 is a function enabling you to delete your Account.
Right to withdrawal	You have the right to withdraw your consent to any processing for which you have previously given consent to.	Requests should be made in writing to <a href="mailto:support@eyeonid.com">support@eyeonid.com</a> or as instructed when you gave your consent.	If you withdraw your consent it will only take effect for the future.

## How we use cookies

Cookies are small text files that are placed on your computer by the websites that you visit. They are widely used to make websites work, or work more efficiently, as well as to provide information to the owners of the site. The use of cookies is now standard for most websites. For more general information on cookies see the Wikipedia article on HTTP Cookies.

## Third party cookies

This site uses a third party to collect data about the use of the website, such as how often and for how long users visit the website, to improve the quality of your experience. We use this information, which does not identify individual users, to analyze trends, to administer the site,



to track users' movements around the site, and to gather demographic information about our user base as a whole.

If you are uncomfortable with the use of cookies, you can manage and control them through your browser, including removing cookies by deleting them from your 'browser history' (cache) when you leave the site. Please note that removing or blocking cookies can impact your user experience and some functionality may no longer be available. For guidance on how to control cookies, please see your browser Help.

For all details on how we use cookies and other tracking devices please read our Cookie Policy.

## 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 send them to you via e-mail or publish them on our website or on the Portal 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 our use of cookies in the Portal, or if you would like further information on our processing of personal data or your right in regards to the Portal, you are welcome to contact us:

[support@eyeonid.com](mailto:support@eyeonid.com)

Eyeonid Group AB  
Blasieholmsgatan 4A  
111 48 Stockholm

You can also contact our DPO via email to [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 Datainspektionen.

**The Service is provided via our while we provide a Portal directly to you for access and use of the Service. If you have any questions regarding the Service, please contact the relevant Reseller.**