

## ○ **PRIVACY POLICY**

- Co\_Made Sthlm AB, 556954-8372, (“**we**”, “**us**” or “**our**”) is committed to safeguard your privacy. This privacy policy describes how we as a data controller collects and uses your personal data when you book a studio at V66, as well as your rights and how to enforce them, in accordance with the General Data Protection Regulation 2016/679 (“**GDPR**”) and additional legislation.
- Please do not hesitate to contact us at office@v66.se, if you have any questions regarding our processing of your personal data.

### ● **PERSONAL DATA, PURPOSE AND LEGAL GROUNDS**

- Personal data means any information relating to a living natural person, both directly (e.g. social security number or a photo) and indirectly (information which together with other information makes it possible to relate to a person).
- The personal data we process are:
  - Booking- and studio details (type of studio, duration, date and time).
  - Contact details (name, email address and telephone number).
  - Payment information (status of payment, expiration date of credit card and use of coupon).
  - IP address and other information collected by cookies and similar techniques.
    - The personal data is either collected directly from you when you fill out the form to book a studio or in our communications if you reach out to us with e.g. support questions. Other sources of data are our payment service provider Stripe Inc. and the unit you are using when visiting our webpage.
    - We process the personal data in order to let us:
      - Provide you the services we have committed to supply to you and to charge you for the same, all according to our contract. We will contact you and communicate with you in different ways, e.g. when giving you support. The processing is necessary for the performance of our contract.
      - Improve current and develop new products and services. The processing is necessary for the purpose of our legitimate interest of product development.
      - Market us and our products and services. We use direct marketing via email (of course always with the option of unsubscribing) where we inform you about us, our new services and offerings. The processing is necessary for the purpose of our legitimate interest of marketing us.

- Communicate in other matters than those connected to our contract. If you reach out to us, with a matter not related to our contract, we process the communications data and your contact details in our legitimate interest of being able to efficiently communicate with you.
- Uphold our obligations according to applicable legislation, e.g. Swedish bookkeeping rules. For this purpose, we only process the necessary data for compliance with a legal obligation to which we are subject.
- Protect our legitimate business interests and legal rights. We will use information about you where we believe it is necessary to defend against or enforce a legal claim and in connection with e.g. audit functions.
  - When you visit our webpage, we will collect information using cookies and similar technologies. More information about our cookies and how we use them is found in our [cookie policy](#). If the information we collect contain personal data, we will process the personal data in order to let us:
- Provide a webpage with basic functionalities. The processing is necessary for the purpose of our legitimate interest of having a webpage and services that are working optimally.
- Retrieve statistics, such as information about how long a visit lasts, which parts of the webpage you have read and other information about behavior on the webpage. The processing is based on the consent you have given for the cookies and similar technologies.
  - If you download material and information we have published on the website, subscribe to our newsletter via email we will process your email address in order to let us send you the requested material/newsletters. The processing is based on your consent. Email address and any other data you give us can be saved and processed for the other purposes described above.

- **TRANSFER OF YOUR PERSONAL DATA**

Your personal data will be shared with selected companies which help us deliver our services. For example, we use suppliers for storing of data in clouds, provision of payment services, CRM tools, emailing, accounting, analytical tools. Suppliers which process personal data are either separate data controllers or, when processing data on our behalf, have signed a data processing agreement according to applicable legislation. Feel free to reach out to us if you wish to know more about the suppliers that we use in the processing of your personal data.

We may have to share your personal data with authorities, courts and other relevant parties if required by law, in conjunction with a legal process or to answer a request from regulators and other authorities.

If we would take a future decision of selling or transfer CoMade Sthlm AB or parts of CoMade Sthlm AB, your personal data might be shared with or transferred to parties involved in the process.

- **TRANSFER TO THIRD COUNTRY**

- In case of a transfer of personal data outside the EU/EEA, for example to a supplier in a third country, the transfer is made under the condition that adequate safeguards are in place in accordance with GDPR.

- **HOW LONG WE KEEP YOUR PERSONAL DATA**

- We keep your personal data as long as necessary to fulfil the purposes for which it was collected. Once fulfilled, your personal data will be erased or anonymized. We regularly review our need to keep data, taking into account applicable legislation.
- How long we save your personal data depends on the type of information and why we process it, thus the same personal data might be saved for different purposes. As an example, we retain the data necessary for us to comply with applicable legislation, such as data necessary for compliance with bookkeeping rules up to 7 years, even though we will erase and anonymize the data for other purposes. We will process data for marketing and developing purposes in up to 12 months. Data necessary for us to defend us against or enforce a legal claim will be stored for as long as we deem it necessary in order for us to investigate, assess and defend against or enforce a legal claim.
- For more information about the retention periods for your data, feel free to contact us at [office@v66.se](mailto:office@v66.se).

- **YOUR RIGHTS AS A DATA SUBJECT**

- **Right to information and access to your data.** You have the right to request information about how we process your data and a transcript of personal data processed by us. The first transcript may be requested free of charge, however if you make repeated and unreasonable requests for copies, we might charge you with an administrative fee.
- **Right to rectification.** You have the right to correct inaccurate or incomplete information about yourself.
- **Right to erasure (“right to be forgotten”).** You have the right to request that we erase personal data about you, for example if the data is no longer necessary in relation to the purposes for which it was collected or otherwise processed, or if there is no legal basis for processing the data.
- **Right to restriction.** You are entitled to request that the processing of your personal data should be limited until inaccurate or incomplete information about you has been corrected, or until an objection from you has been handled.

- **Right to object.** You have right to object to processing based on legitimate interest. This means that we may no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests.
- **Right to withdraw your consent.** You may at any time withdraw any consent you have given us. However, please note that it will not affect any processing that has already taken place.
- **Right to complain.** You have the right to lodge a complaint to the Supervisory Authority in the country you live or work in, if you believe that we have not complied with our obligations regarding your personal data.

In Sweden the Supervisory Authority is *Integritetsskyddsmyndigheten* and if you wish to file a complaint go to the [website of Integritetsskyddsmyndigheten](#).

*Please note that if you request restriction or erasure it might affect our abilities to provide our Service to you. Moreover, legal rights or obligations or a legal claim may prevent us from disclosing or transfer all or part of your information, or from deleting or transferring all or part of your information.*

If you wish to exercise any of your rights, please contact us at [office@v66.se](mailto:office@v66.se).

- **CHANGES TO THIS PRIVACY POLICY**

- We might change and update this privacy policy. The latest updated version is always found on this website. We recommend that you regularly visit our website to keep updated on our processing of personal data.
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*The privacy policy was last updated on 20210224*