

# Privacy Policy

## Gynius Plus AB

10th January 2022

Thank you for choosing to be part of our community at Gynius Plus AB. We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy notice or our practices, with regards to your personal information, please contact us at [info@gynius.se](mailto:info@gynius.se).

This privacy notice describes how we might use your information if you:

- Download and use our mobile application
- Engage with us in other related ways- including any sales, marketing, or events

In this privacy notice, if we refer to:

**“App,”** we are referring to any application of ours that references or links to the policy, including any listed above

**“Services,”** we are referring to our App, and other related services, including any sales, marketing, or event

The purpose of this privacy notice is to explain to you in the clearest way possible what information we collect, how we use it, and what rights you have in relation to it. If there are any terms in this privacy notice that you do not agree with, please discontinue use of our Services immediately.

**Please read this privacy notice carefully, as it will help you understand what we do with the information that we collect.**

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## 1. WHAT INFORMATION DO WE COLLECT?

### Personal information you disclose to us

***In short:*** We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and services when you participate in activities on the App or otherwise when you contact us.

The personal information that we collect depends on the context of your interactions with us and the App, the choices you make and the products and features you use. The personal information we collect may include the following:

**Personal Information Provided by You.** We collect names; email addresses; usernames; passwords; medical data; and other similar information.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

### Information automatically collected

***In Short:*** Some information- such as your Internet Protocol (IP) address and/or browser and device characteristics- is collected automatically when you visit our App

We automatically collect certain information when you visit, use or navigate the App. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our App and other technical information. This information is primarily needed to maintain the security and operation of our App, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

The information we collect includes:

- ***Log and Usage Data.*** Log and Usage Data is service-related, diagnostic, usage and performance information our servers automatically collect when you access or use our App and which we record in log files. Depending on how you interact with it, this log data may include your IP address, device information, browser type and settings and information about your activity in the App (such as the date/time stamps associated with your usage, page and files viewed, searches and other actions you take such as which feature you use), device event information (such as system activity, error reports (sometimes called crash dumps) and hardware settings).

## Information collected through our App

***In Short:** We collect information regarding your mobile device when you use our App.*

If you use our App, we also collect the following information:

- **Mobile Device Access.** We may request access or permission to certain features from your mobile device, including your mobile device camera, storage and other features. If you wish to change our access or permissions, you may do so in your device's settings.

This information is primarily needed to maintain the security and operation of our App, for troubleshooting and for our internal analytics and reporting purposes.

## 2. HOW DO WE USE YOUR INFORMATION?

***In Short:** We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.*

We use personal information collected via our App for a variety of business purposes described below. We process your personal information for the purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

In legal terms, we are generally the “data controller” under European data protection laws since we determine the means and/or purposes of the data processing we perform. However, if you are a business customer with whom we have entered into a data processing agreement for the provision of corporate services to you, then you would be the “data controller” and we would be the “data processor” under the European data protection laws since we would be processing data on your behalf in accordance with your instructions.

We use the information we collect or receive:

- **To facilitate account creation and logon process.** If you choose to link your account with us to third-party account (such as your Google or Facebook account), we use the information you allowed us to collect from those third parties to facilitate account creation and logon process for the performance of the contract.
- **To post testimonials.** We post testimonials on our App that may contain personal information. Prior to posting a testimonial, we will obtain your consent to use your name and the content of the testimonial. If you wish to update or delete your testimonial, please contact us at [info@gynius.se](mailto:info@gynius.se) and be sure to include your name, testimonial location, and contact information.

- **Request feedback.** We may use your information to contact you about your use of our App.
- **To enable user-to-user communications.** We may use your information in order to enable user-to-user communication with each user's consent and request.
- **To manage user accounts.** We may use your information for the purposes of managing our account and keeping it in working order.
- **To send administrative information to you.** We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions and policies.
- **To protect our Services.** We may use your information as part of our efforts to keep our App safe and secure (for example, for fraud monitoring and prevention).
- **To enforce our terms, conditions and policies for business purposes, to comply with legal and regulatory requirements or in connection with our contract.**
- **To respond to legal requests and prevent harm.** If we receive a subpoena or other legal requests, we may need to inspect the data we hold to determine how to respond.

### 3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

***In Short:** We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfil business obligations.*

We may process or share your data that we hold based on the following legal basis:

- **Consent:** We may process your data if you have given us specific consent to use your personal information for a specific purpose.
- **Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- **Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfil the terms of our contract.
- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate prevent or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all

or a portion of our business to another company.

#### 4. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

***In Short:*** We may use cookies and other tracking technologies to collect and store your information.

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

#### 5. HOW LONG DO WE KEEP YOUR INFORMATION?

***In Short:*** We keep your information for as long as necessary to fulfil the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in the privacy notice unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us to keep your personal information for longer than 2 years.

When we have no ongoing legitimate business need to process your personal information, we will delete or anonymize such information, or if this is not possible (for example, because your personal information has been stored in a backup archive), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

#### 6. HOW DO WE KEEP YOUR INFORMATION SAFE?

***In Short:*** We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, the transmission of personal information to and from our APP is at your own risk. You should only access the App within a secure environment.

#### 7. DO WE COLLECT INFORMATION FROM MINORS?

***In Short:*** We do not knowingly collect data from or market to children under the age of 18.

We do not knowingly solicit data from or market to children under 18 years of age. By using the App, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the App. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may

have collected from children under age 18, please contact us at [info@gynius.se](mailto:info@gynius.se).

## 8. WHAT ARE YOUR PRIVACY RIGHTS?

***In Short:*** *In some regions, such as the European Economic Area (EEA) and United Kingdom (UK), you have rights that allow you great access to and control over your personal information. You may review, change, or terminate your account at any time.*

In some regions (like the EEA and UK), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please use the contact details provided below. We will consider and act upon any request in accordance with applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you are a resident in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here:

<https://ec.europa.eu/newsroom/article29/items/612080>

If you are a resident in Switzerland, the contact details for the data protection authorities are available here:

<https://www.edoeb.admin.ch/edoeb/en/home.html>

**Cookies and similar technologies:** Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our App.

## 9. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

## 10. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

***In Short:*** Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the name and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with the App, you have the right to request the removal of unwanted data that you publicly post on the App. To request the removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure that data is not publicly displayed on the App, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g. backups, etc.).

## 11. DO WE MAKE UPDATES TO THIS NOTICE?

***In Short:*** Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such change or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

## 12. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have any questions or comments about this notice, you may email us at [info@gynius.se](mailto:info@gynius.se) or by post to:

Gynius Plus AB  
Järnbrotts Prästväg 2  
Gothenburg, Västra Frölunda , 421 47  
Sweden

If you are a resident in the European Economic Area, the “data controller” of your personal information is Gynius Plus AB. Gynius Plus AB has appointed Gynius Plus AB to be representative in the EEA. You can contact them directly regarding the processing of your information be Gynius Plus AB, by email at [info@gynius.se](mailto:info@gynius.se) , by visiting <https://gynius.se/> , or by post to:

Järnbrotts Prästväg 2  
Gothenburg, Västra Frölunda , 421 47, Sweden

### 13. HOW CAN YOU REVIEW, UPDATE OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update or delete your personal information, please visit: [www.colpadvisor.se/user/settings](http://www.colpadvisor.se/user/settings) .

*This privacy policy was created by Gynius Plus AB.*