

PRIVACY POLICY – EANDOX

CarbonZero AB ("CarbonZero", "we", "our" and "us") cares about your privacy and wants you to feel safe when we process your personal data.

In this privacy policy we want to inform you who interact with us in different situations about how we process your personal data. This policy does not cover how we process the personal data that your company stores in the EandoX software. Your company is the responsible controller of such data, and we process it in accordance with our Data Processing Agreement with your company. In this privacy policy we distinguish between our publicly available **Website** (<https://www.eandox.com/>) and our Software ("Web Application", "Service" and "EandoX") available to its users through paid subscriptions or invites (*.[eandox.com/app](https://www.eandox.com/app)).

If you have any questions, please feel free to [contact us](#).

Summary: How we process your personal data

- [If you visit our Website](#), we process your personal data to provide a functioning Website and remember your choices, and if you have given your consent, to improve the Website and show you relevant marketing from us;
- [If you represent our customer or partner](#), we process your personal data to enter into an agreement with your company and administrate our relationship, provide customer service and enable you to login, handle your feedback, and improve EandoX;
- [If you represent our current or potential supplier](#), we process your personal data to enter into an agreement with your company and administrate our relationship;
- [If you interact with us without having a business relationship with us, represent a business lead, or visit our social media](#); we process your personal data to communicate with you and to set up a demo of EandoX;
- [If you receive our marketing](#), we process your personal data to market us towards the company you represent, send you newsletters, and improve our newsletters;
- [If you participate in any of our events or webinars](#), we process your personal data to arrange events and webinars and to take photos/videos during events and to publish them;
- [If you or your company have queries, complaints, or similar, and to comply with legal obligations](#), we process your personal data to handle these and comply with bookkeeping and accounting legislation, and to comply with marketing legislation.

Depending on the relationship we have with you, we process your personal data for all or only some of the above stated purposes. A detailed description of our processing of your personal data is provided in the tables below.

Your rights: When we process your personal data, you have certain rights as described in detail in the bottom of this privacy policy. In summary, you have the following rights:

- ✓ [The right to complain](#)
- ✓ [The right to withdraw your consent](#)
- ✓ [The right to rectification](#)
- ✓ [The right to erasure](#)

- ✓ [The right of access](#)
- ✓ [The right to object](#)

- ✓ [The right to restriction of processing](#)
- ✓ [The right to data portability](#)

We mainly process your personal data within the EU/EEA. When we use certain third-party services, we will transfer your personal data outside of the EU/EEA to our suppliers that are located there. Such transfer only takes place when we can ensure an appropriate level of protection of your personal data.

Below you can find detailed information on how and why we process your personal data, the legal basis for processing and the storage period for which we keep your personal data. The information also describes [your rights](#).

Table of contents

By clicking on the links below you can read more about how we process your personal data.

[Data controller and our contact details](#)

[From where do we collect your personal data?](#)

[The personal data you need to provide to us](#)

[Who can gain access to your personal data and why?](#)

[Where are your personal data processed?](#)

[Detailed information about how we process and store your personal data](#)

- [If you visit our Website](#)
- [If you represent our customer or partner](#)
- [If you represent our current or potential supplier](#)
- [If you interact with us without having a business relationship with us, represent a business lead or visit our social media](#)
- [If you receive our marketing](#)
- [If you participate in any of our events or webinars](#)
- [If you or your company have any questions or queries and to comply with legal obligations](#)

[Balancing of interests](#)

[Your rights](#)

When we refer to “your company” in this privacy policy, we mean your employer or the organization you represent. We only process personal data about you in your professional capacity, which means, for example, that we send marketing communications to your company and not to you as a private individual.

Data controller and our contact details

CarbonZero AB (Swedish registration number 559253-4738), is responsible for the processing of your personal data.

Should you have any questions regarding our processing of your personal data, or if you wish to exercise any of your rights under data protection legislation, please contact us via our

e-mail address info@eandox.com, or our postal address which is Carbonzero AB, Tåstrupsgatan 2, 262 32 Ängelholm, Sweden.

From where do we collect your personal data?

We collect your personal data directly from you, for example when you contact us, and when you use our Website, we will gather information from your device (e.g., smartphone or computer). We will also collect your personal data from your company if they designate you as their representative. We will also collect your personal data from other sources in the following situations: If you represent a potential customer, supplier, or partner (i.e. a business lead), we will collect your personal data from the internet or from a third-party service.

If you use our Website, we will use third-party services, such as Google Analytics, to collect information about your browsing behaviour in order to analyse your use of our Website.

The personal data you need to provide to us

In general, you are not required to provide your personal data to us. You find a description of when you are needed to provide your personal data in the tables below when the so-called legal basis is stated to be a "Legal obligation". If you don't provide such personal data to us, we will not be able to administrate our relationship with your company or fulfil the agreements with your company.

Who can gain access to your personal data and why?

Your personal data is initially collected and processed by us as the data controller, and we do not sell your personal data. Access to your personal data is limited to our employees who require such access to perform their duties.

To conduct our business, we need to work with suppliers and partners who will process your personal data on our behalf. We are responsible for sharing your personal data with such suppliers and partners and for ensuring that your personal data remains protected when shared with third parties, as set out below.

In the tables below, we have described in detail how we share your personal data in each specific case and which personal data is shared. Here, you will find a summary of the third parties we use and how we share your personal data with them:

- We will share your personal data with our **IT partners**, who process your personal data on our behalf (as data processors) and according to our instructions to ensure sound and secure IT operations. We only share your personal data with our IT partners when necessary for them to fulfil their obligations towards us under our contract with them. *We share personal data with them for most of the purposes listed in the tables below and therefore will not list these separately.*
- We use third parties which, on our behalf and according to our instructions, help us administer our **marketing** and, therefore, will have access to your personal data.

- If you interact with us on or visit our **social media** accounts, the social media platform you use will process personal data about you as a user, and will do so as independent data controllers for their own processing activities.
- If you receive our **newsletters**, we share your personal data with the provider we use to manage our newsletters, HubSpot.
- To store information that we are required to retain under **bookkeeping and accounting legislation**, we will use an archival service provider that processes such information as our data processor and according to our instructions. The archived information contains personal data but will only be processed on our behalf and according to our instructions.
- When you use our Website and consent to us doing so, we will also share your personal data with companies that provide analytic and marketing services, such as [Google](#), which provides services **to analyse the Website as well as to market to you**.
- If you as a representative of our customer or partner **leave feedback**, we will share your personal data with the supplier of the feedback service we use.
- If you participate in any of our events, we will share your personal data with:
 - The photographer that takes your picture will gain access to your personal data and will process your personal data on our behalf and our instructions;
 - Social media platforms, if we publish a picture or video in which you appear. These social media platforms are either processing your personal data on our instructions or as controllers in their own right for their processing of your personal data. Their role in a particular case depends on the specific platform and activity;
 - Our event partner, if we arrange the event in collaboration with such partner.

If you have any questions regarding how we share your personal data or want to know more about who we share your personal data with, please feel free to [contact us](#).

Where are your personal data processed?

We mainly process your personal data within the EU/EEA. In some instances, we will transfer your personal data outside of the EU/EEA to our suppliers. Such suppliers will process your personal data as our data processors and according to our instructions, or as independent data controllers for their own processing activities. Such transfer only takes place in accordance with applicable data protection legislation meaning that we will only transfer your personal data outside the EU/EEA where we can ensure an appropriate level of protection for your personal data.

We will transfer your personal data in the following ways:

- If you use our Website and have consented to us using analytic- and marketing services from Google among others, your personal data can be considered transferred outside of the EU/EEA. These parties will transfer your personal data to

the United States since they are located there. We have masked your personal data as best possible to avoid your personal data being transferred outside of the EU/EEA.

- If you contact us via LinkedIn, your personal data will be processed outside the EU/EEA to the United States, by being shared with LinkedIn when you choose to be active on LinkedIn.
- When we process your personal data to send you newsletters, we share your personal data with our service provider HubSpot, which is based in the United States.

When we transfer personal data to other countries outside the EU/EEA, we do so based on the following mechanisms:

- When your personal data is transferred to the United States, this is done based on adequacy decisions by the European Commission pursuant to Article 45 of the GDPR. This means that the EU has assessed that these countries have adequate protection for your personal data. In the case of the United States, this agreement between the EU and the United States is called the [EU-US Data Privacy Framework](#). Google, LinkedIn and HubSpot are certified under the EU-US Data Privacy Framework.
- When US companies are not certified under the EU-US Data Privacy Framework, or in the rare situation where we transfer personal data to a country not subject to an adequacy decision, we cannot rely on the adequacy decision for transfers. In such cases, we will transfer your personal data under the Standard Contractual Clauses (Article 46.2 (c) GDPR) together with supplementary measures. You can find the Standard Contractual Clauses [here](#). We have implemented additional safeguards to ensure that your personal data is protected, for example, we have minimised the information these third parties receive, and we always try to avoid sharing your personal data in clear text with such third parties.

If you want to know more about the additional safeguards we have implemented to protect your personal data, please feel free to [contact us](#).

Detailed information about how we process your personal data

In this detailed description below, you can read more about:

- why we process your personal data,
- the categories of personal data we process,
- the legal basis for the processing of your personal data, and
- how long we store your personal data.

Under the headings "[Who can gain access to your personal data and why?](#)" and "[Where are your personal data processed?](#)" above, we describe whether your personal data is processed by parties other than CarbonZero and why, as well as whether your personal data is transferred outside the EU/EEA.

Don't hesitate to [contact us](#) if you have any questions regarding our processing of your personal data.

If you visit our Website

We analyse how our Website is used and show you relevant marketing on social media and other Websites you visit based on such analysis. Accordingly, your personal data is processed when you visit our Website. To protect your privacy, we have taken measures to avoid identifying you when you visit our Website. For instance, we only store an encrypted version of your IP address to reduce the risk of being able to identify you.

We also process your personal data to make the Website and service technically function and to remember your choices. We collect your personal data from your device (e.g. smartphone or computer) when you visit our Website or use our Web Application.

When you visit our Website, we will gather your personal data from your device and from the companies we cooperate with (see below). Such companies will also use previous information they have about you to show you interesting offers.

When you use our Website, we will gather personal data by using cookies. Our text about cookies describes how we do this, which you find [here](#).

To analyse how our Website is used		
What processing we perform	What personal data we process	Our legal basis for the processing
<p>- Analyse how you use our Website to improve our Website and offerings. To do this, we use analytic services, such as Google Analytics and Mouseflow</p> <p>The analytic services involve placing a random ID on your device to distinguish your device from other visitors and to identify patterns in how our Website is used. We will, however, not know who you are</p> <p>The personal data we gather will be used, e.g. to optimise functions and to adapt the Website and Web Application to suit our visitors</p> <p><i>Do you want to read more about how we use cookies? You find a more detailed description of this in our information about cookies</i></p>	<ul style="list-style-type: none"> - An encrypted version of your IP address, which we at CarbonZero can't connect to you as an individual - Information about your device/browser (which area in the country you use our Website from and which screen resolution you have) - Information about your activities on the Website - Other information that Google has about you, such as information about the Website from which you found us 	<p>Consent (Article 6.1 (a) GDPR)</p> <p><i>We will only process your personal data for this purpose if you consent.</i></p> <p><i>You can prevent Google Analytics from using your personal data by downloading and installing this browser add-on.</i></p> <p><i>You have the right to withdraw your consent at any time by contacting us. Your withdrawal of consent shall not affect the lawfulness of the processing before its withdrawal.</i></p>
<p>Storage period: We will store your personal data, which is pseudonymised, for a period of twelve months after your visit on our Website.</p>		

The suppliers of the analytic services we use will continue to store your personal data for their own purposes. E.g. Google will continue to store your personal data for their own purposes and [Google](#) will inform you separately about such storing.

Recipients: If you consent, we will share your personal data with the suppliers of the analytic services we use to analyse the Website, such as [Google](#).

To show you relevant marketing from us		
What processing we perform	What personal data we process	Our legal basis for the processing
<ul style="list-style-type: none"> - Market our offerings by showing you offers we believe you or your company are interested in <p>We show you such marketing on e.g. Google (including YouTube). You see marketing based on information that these companies have about you beforehand (so called <i>profiling*</i>)</p> <ul style="list-style-type: none"> - Share information about you with e.g. Google so that these marketing services will have information about which type of visitors that are interested in us <p><i>Do you want to read more about how we use cookies? You find a more detailed description of this in our information about cookies</i></p>	<ul style="list-style-type: none"> - An encrypted version of your IP address, which we at CarbonZero can't connect to you as an individual <p>Thereafter you will see search results and ads based on:</p> <ul style="list-style-type: none"> - An analysis of how you use our Website - Information that the marketing services we use have about you from before, e.g. information about from which site you found us 	<p>Consent (Article 6.1 (a) GDPR)</p> <p><i>We will only process your personal data for this purpose if you consent.</i></p> <p><i>Here you can make choices about the marketing you see from Google.</i></p> <p><i>You have the right to withdraw your consent at any time by contacting us. Your withdrawal of consent shall not affect the lawfulness of the processing before its withdrawal.</i></p>
<p>Storage period: You will see marketing from us on other websites and on social media for a period of twelve months after your visit to our Website.</p> <p>The services we use, such as Google (including YouTube), will continue to process your personal data and will be independently responsible. Information on how long they store your personal data can be found in their respective privacy information.</p>		
<p>Recipients: If you consent, we will share your personal data with the service providers we use, such as Google.</p>		

* **Profiling:** We use so called profiling to be able to show you offers that are relevant to you and to provide you with customized marketing. We use profiling because, without it, you would instead see offers and information which you are probably not interested in. You have the right to object to profiling as described below under the section explaining [your rights](#).

To provide a functioning Website		
What processing we perform	What personal data we process	Our legal basis for the processing

<ul style="list-style-type: none"> - Make sure that our Website works in a satisfying and secure manner and adapt the Website to your device - Enable you to play videos, such as videos hosted on YouTube that are embedded on the Website. 	<ul style="list-style-type: none"> - IP-address including which country the internet connection is from - Information about your device, such as the type of device, e.g. mobile phone, computer or tablet. - A pseudonymized account- ID that identifies you as a unique visitor 	<p>Legitimate interest (Article 6.1 (f) GDPR)</p> <p><i>The personal data is processed based on our legitimate interest to provide a functioning Website.</i></p>
--	--	---

Storage period: The personal data used to provide a functioning Website will be processed during your visit of the Website and until you close your browser.

To remember your choices at our Website		
What processing we perform	What personal data we process	Our legal basis for the processing
<ul style="list-style-type: none"> - We use cookies and similar technologies to save and remember information about your choices 	<ul style="list-style-type: none"> - Information about your choices/preferences, e.g., if you have consented or other preferences you have chosen 	<p>Legitimate interest (Article 6.1 (f) GDPR)</p> <p><i>The personal data is processed based on our legitimate interest to remember Your choices and adapt the Website to suit you.</i></p>
<p>Storage period: As a general practice, the personal data will only be used during your visit and for some time thereafter, but no longer than six months after your choice.</p>		

If you represent our customer or partner

The tables below describe how we process your personal data in the scenario that you represent a customer or partner. We gather the personal data directly from you or your company.

To enter into an agreement with your company and administrate our relationship		
What processing we perform	What personal data we process	Our legal basis for the processing
<ul style="list-style-type: none"> - Negotiate and enter into an agreement with your company - Administrate our relationship with your company (e.g. communicate with our customer or partner) 	<ul style="list-style-type: none"> - Information you provide to us, e.g. name, organisational belonging, position in your company, telephone number and e-mail address 	<p>Legitimate interest (Article 6.1 (f) GDPR)</p> <p><i>The personal data will be processed based on our legitimate interest to negotiate and enter into an agreement with your company and to administrate the agreement.</i></p>
<p>Storage period: Your personal data will be removed if we conclude that we will not enter into an agreement with your company.</p> <p>If your company becomes our customer or partner, we will store your personal data for this purpose as long as your company is our customer or partner, however for a shorter period if we receive information that you no longer represent the company.</p> <p>However, your personal data will still be processed in agreements, invoices, and similar documents where your</p>		

name appears.

To provide customer service and enable you to login		
What processing we perform	What personal data we process	Our legal basis for the processing
<ul style="list-style-type: none"> - Provide you with relevant information and communicate with you as a representative of our customer or partner - Administrate support matters - Handle requests for missing resources <p><i>Your organisation is responsible (data controller) for any information that you register in EandoX on behalf of your organisation.</i></p>	<ul style="list-style-type: none"> - Name, organisational belonging, position in your company, telephone number, e-mail address - Information about the support matter or request 	<p>Legitimate interest (Article 6.1 (f) GDPR)</p> <p><i>The personal data will be processed based on our legitimate interest to provide customer service</i></p>
<ul style="list-style-type: none"> - Enable you, as a representative of our customer or partner, to create an account, log in to EandoX, and access your or your company's accounts, including any supplier account. 	<p>For login:</p> <ul style="list-style-type: none"> - E-mail address, name, organisational belonging, subdomain, password and technical information regarding your login 	<p>Legitimate interest (Article 6.1 (f) GDPR)</p> <p><i>The personal data will be processed based on our legitimate interest to enable you to create, log in and access your or your company's accounts.</i></p>
<ul style="list-style-type: none"> - Record support sessions for the purpose of improving our software and features 	<ul style="list-style-type: none"> - Information you provide to us during our communication, e.g. name, organisational belonging, and any information regarding your use of EandoX 	<p>Legitimate interest (Article 6.1 (f) GDPR)</p> <p><i>The personal data will be processed based on our legitimate interest to improve our software and customer service.</i></p>
<p>Storage period: We will process your personal data related to support matters for as long as your company remains our customer or partner, or for a shorter period if we receive information that you no longer represent our customer or partner. Your personal data will only be processed for this purpose where it is necessary for us to provide continued service and to review previous support matters in relation to our customers and partners.</p> <p>Recordings of our support sessions will be processed for twelve months after the ending of the support session.</p> <p>We will process your account information to enable you to log in and access customer accounts for as long as your company is our customer or partner, or for a shorter period if we receive information that you no longer represent our customer or partner.</p>		

To gather and handle your feedback

What processing we perform	What personal data we process	Our legal basis for the processing
<ul style="list-style-type: none"> - Send you invitations to participate in surveys concerning your use of EandoX. - Collect and analyse your feedback - Manage any responses you provide in our surveys and compile statistics based on the survey results 	<ul style="list-style-type: none"> - Name - E-mail address - Information you state in our surveys - Role - Company that you work for 	<p>Legitimate interest (Article 6.1 (f) GDPR)</p> <p><i>The personal data will be processed based on our legitimate interest to be able to collect and evaluate your feedback and for us to improve our business.</i></p>
<p>Storage period: We will store information from your answers when you provide the feedback as long as the company you represent is our customer or partner.</p>		
<p>Recipients: We will share your personal data with the provider of the feedback service we use.</p>		

To improve EandoX by analysing your use of it		
What processing we perform	What personal data we process	Our legal basis for the processing
<ul style="list-style-type: none"> - Analyse user sessions in EandoX. - Collect and analyse statistics and improve our software 	<ul style="list-style-type: none"> - Name - E-mail address - Information related to how you use EandoX, such as what activities you perform 	<p>Legitimate interest (Article 6.1 (f) GDPR)</p> <p><i>The personal data will be processed based on our legitimate interest to improve our software.</i></p>
<p>Storage period: We continue analysing for as long as you use the services, but will pseudonymise the personal data after twelve months</p>		

To enable the use of EandoX Global Library		
What processing we perform	What personal data we process	Our legal basis for the processing
<p><i>Please note that your organisation is responsible (data controller) for how you integrate information from the Global Library to your private local libraries, products and documentation in EandoX.</i></p> <p><i>We are only data controllers for the below processing activities:</i></p> <ul style="list-style-type: none"> - Scraping information from published Environmental Product Declarations (“EPD’s”) - Structure, digitalise and make EPDs openly available in the 	<ul style="list-style-type: none"> - Personal data contained in the EPD’s such as names, email addresses, phone numbers, addresses of EPD owners, program operators, Lifecycle Assessment (LCA) practitioners and 3rd party verifiers. 	<p>Legitimate interest (Article 6.1 (f) GDPR)</p> <p><i>The personal data will be processed based on our legitimate interest to improve our software.</i></p>

Global Library		
<p>Storage period: We store this data for as long as a given EPD is valid and available for public usage to provide a functioning service to users of our Web Application. We will remove the data e.g. if the EPD is unpublished or passes its date of validity without an update.</p>		

If you represent our current or potential supplier

To enter into an agreement with your company and administrate our relationship		
What processing we perform	What personal data we process	Our legal basis for the processing
<ul style="list-style-type: none"> - Negotiate and enter into an agreement with your company - Administrate our relationship with your company (e.g. communicate with our supplier) 	<ul style="list-style-type: none"> - Name, organisational belonging, position in your company, telephone number and e-mail address 	<p>Legitimate interest (Article 6.1 (f) GDPR)</p> <p><i>The personal data will be processed based on our legitimate interest to negotiate and enter into an agreement with your company and to administrate the agreement.</i></p>
<p>Storage period: Your personal data will be removed if we conclude that we will not enter into an agreement with your company.</p> <p>If your company becomes our supplier, we will store your personal data for this purpose as long as the company you represent is our supplier, however for a shorter period if we receive information that you no longer represent the company.</p>		

If you interact with us without having a business relationship with us, represent a business lead or visit our social media

If you are in contact with us without having a business relationship with us, for example by sending us an e-mail or a message on our social media account, we will process your personal data as we describe in the tables below. We process the personal data you provide us and information from your social media account (if you use such an account to communicate).

When contacting us through a social media platform, we suggest you also familiarise yourself with the privacy information of that platform.

To communicate with you		
What processing we perform	What personal data we process	Our legal basis for the processing
<ul style="list-style-type: none"> - Communicate, e.g., via e-mail - Communicate via social media, e.g., if you comment on our page or send us direct messages - Communicate if you have used 	<ul style="list-style-type: none"> - Information you provide to us, e.g. name and contact information <p>If you visit our social media accounts (e.g. our LinkedIn page) we also process:</p>	<p>Legitimate interest (Article 6.1 (f) GDPR)</p> <p><i>The personal data will be processed based on our legitimate interest in communicating with you who have contacted us.</i></p>

<p>a form at our website</p> <ul style="list-style-type: none"> - Provide answers to your questions and deliver optimal service 	<ul style="list-style-type: none"> - Information from your profile on the social media in question (user name and any picture you have chosen for your account) - Other information regarding the matter for which you contact us 	
<p>Storage period: We will delete your personal data regularly and as described below:</p> <ul style="list-style-type: none"> • Communication with us via our websites or in e-mails will be stored for a period of twelvemonths after the matter for which you have contacted us has been resolved, in order for us to give you the best service. • Your comments and communication with us on social media can be deleted by you at any time. We will remove posts or comments which are in breach of the rules of the platform or in conflict with legislation as soon as possible. • If we find that your company is a business lead after we have had contact with you, we will store your personal data for twelve months if we conclude that we will not enter into an agreement with your company. 		
<p>Recipients: When you interact with us on our social media account, the social media platform that you use will process personal data about you as a user. These social media platforms will continue to process your personal data as independent controllers. Information about how long they store your personal data can be found in their respective privacy information.</p>		

To set up a demo of EandoX		
What processing we perform	What personal data we process	Our legal basis for the processing
<ul style="list-style-type: none"> - Enable you to book a free demo of EandoX 	<ul style="list-style-type: none"> - Information you provide to us when booking a demo (name, e-mail, company belonging) 	<p>Legitimate interest (Article 6.1 (f) GDPR)</p> <p><i>The personal data will be processed based on our legitimate interest to facilitate our demo of EandoX.</i></p>
<p>Storage period: We will delete your personal data six months after the demo. If we find that your company is a business lead, we will store your personal data for twelve months.</p>		

If you receive our marketing

The table below describes how we process your personal data if you receive our marketing, including if you subscribe to our newsletters. We gather your personal data directly from you and provide some personal data ourselves by analysing how you use our newsletters.

To market ourselves and improve our newsletters		
What processing we perform	What personal data we process	Our legal basis for the processing
<p>If you have shown interest in EandoX, e.g. by booking a demo or subscribing to our newsletter, or if your company is a customer or partner to us</p> <ul style="list-style-type: none"> - We market ourselves to the 	<ul style="list-style-type: none"> - First name, last name - Contact information, such as phone number and email address - Information about which 	<p>Legitimate interest (Article 6.1 (f) GDPR)</p> <p><i>If you have shown interest in our EandoX, your personal data will be processed based on our legitimate interest to market our software towards the company you represent which we</i></p>

company you represent by email. This includes e.g., information about news, marketing, offers and invitations (“newsletters”).	organisation you represent - Information you provide to us during our calls, emails etc	<i>consider could be interested in EandoX or to have a business relationship with us.</i> <i>If your company is one of our customers or partners, your personal data will be processed based on our legitimate interest to provide relevant marketing towards your organization.</i>
- Improve and develop our newsletters by analysing how you open them and what you click on in the newsletters	- Information about how you open our newsletters and what you click on - IP-address - E-mail address	Legitimate interest (Article 6.1 (f) GDPR) <i>Your personal data will be processed based on our legitimate interest to improve and develop our newsletters</i>
Storage period: You can choose to unsubscribe or object to receiving newsletters and marketing at any time. If you object to receiving marketing from us, we keep track of this in our “ unsubscribe-list ” to avoid sending you any further marketing material. If your company is a customer or partner, we will process your personal data as long as your company is our customer or partner, however for a shorter period if we receive information that you no longer represent the company.		
Recipients: We use third parties which on our behalf and on our instructions, help us administrate our marketing and, therefore, will have access to your personal data.		

If you participate in any of our events or webinars

To arrange events and webinars		
What processing we perform	What personal data we process	Our legal basis for the processing
<ul style="list-style-type: none"> - Administrate your registration to one of our events or webinars (“event”) - Communicate with you before and during the event - Send requests to participate in evaluations after the event, administrate the answers you provide in the evaluation, and compile statistics based on the evaluation results 	<ul style="list-style-type: none"> - Name, organisational belonging, position in your company, telephone number and e-mail address - Dietary preferences (if applicable) - Information you provide in an evaluation (if applicable) 	<p>Legitimate interest (Article 6.1 (f) GDPR)</p> <p><i>The personal data will be processed based on our legitimate interest to arrange events.</i></p> <p>Consent (Article 6.1 (a) and 9.2 (a) GDPR)</p> <p><i>If we process sensitive personal data such as information about your allergies, we will obtain your explicit consent.</i></p> <p><i>You have the right to withdraw your consent at any time by contacting us. Your withdrawal of consent shall not affect the lawfulness of the processing before its withdrawal.</i></p>
<p>Storage period: Your personal data will be stored until the event is completed. However, a participant list that you are part of will be saved in order for us to be able to follow up your participation in the event and invite you to similar events. We will remove your personal data if you ask us to do so.</p> <p>Where we have sent you an evaluation following an event to which you have responded, we will store the evaluation results for six months after you have provided your response. We will stop sending evaluations if you object to receiving them.</p>		

Recipients: If you participate in an event arranged by us in collaboration with a partner, we will share your personal data with that partner, who will also process your personal data. When you register for such an event or webinar, you will be informed of the partner's identity and where to find their privacy information.

If you or your company have any questions or queries and to comply with legal obligations

We always strive to maintain a good relationship with your company and to answer all questions you or your company may have. If you or your company have any questions, wish to make a complaint regarding our software or offerings, or if we have a claim against your company, we will process your personal data as described below. We will collect your personal data from you or your company or provide the information ourselves.

We must also process your personal data to comply with legal obligations to which we are subject. In such cases, you are required to provide us with your personal data; otherwise, we cannot comply with our legal obligations.

Please note that an ongoing matter can prevent us from deleting all your personal data following your [request](#).

To handle any questions, complaints or claims		
What processing we perform	What personal data we process	Our legal basis for the processing
<ul style="list-style-type: none"> - Handle any questions, complaints or claims - To defend ourselves against claims and complaints - To initiate any claims 	<p>We will only process the personal data necessary to handle a specific case, such as:</p> <ul style="list-style-type: none"> - Name, organisational belonging, position at your company, telephone number, e-mail address and information regarding your company's complaint or claim 	<p>Legitimate interest (Article 6.1 (f) GDPR)</p> <p><i>The personal data is processed based on our legitimate interest to handle a question, complaint and/or legal dispute in which you are the representative of a customer, supplier or partner</i></p>
<p>Storage period: We will store your personal data from the time the matter was initiated and for the duration of the potential dispute.</p>		

To comply with bookkeeping and accounting legislation		
What processing we perform	What personal data we process	Our legal basis for the processing
<ul style="list-style-type: none"> - Store information in bookkeeping and accounting 	<ul style="list-style-type: none"> - Name, history regarding payments made and other information that constitutes accounting records 	<p>Legal obligation (Article 6.1 (c) GDPR)</p> <p><i>The processing is necessary to comply with legal obligations to which we are subject, i.e., bookkeeping and accounting legislation.</i></p> <p><i>You are required to provide such personal data to us; otherwise, we cannot comply with our legal obligations.</i></p>

Storage period: We will store any document constituting bookkeeping material and personal data included therein for seven to eight years according to bookkeeping and accounting legislation. The regulation means that we store bookkeeping material until and including the seventh year after the end of the calendar year for the fiscal year to which the personal data relates.

Recipients: In order to store information that we according to bookkeeping and accounting law are required to store, we use a company that help us archive such information.

To comply with marketing legislation		
What processing we perform	What personal data we process	Our legal basis for the processing
- If you have stated that you do not wish to receive marketing from us, we will store such information in an “unsubscribe-list” to make sure we do not send any marketing to you	- Name - E-mail address	Legal obligation (Article 6.1 (c) GDPR) <i>The processing is necessary to comply with legal obligations which we are subject to, i.e., marketing law, which requires us to not send marketing material to individuals who have objected to receiving such marketing.</i> <i>We cannot make sure you will not receive marketing from us without processing your personal data for this purpose and you are therefore required to provide your personal data to us.</i> <i>You need to provide the personal data to us. Otherwise, we cannot ensure that you will not receive any more marketing from us.</i>
Storage period: You will be listed in our “unsubscribe-list” until further notice.		

Balancing of interests assessments when processing personal data based on the legal basis “legitimate interests”

As we state above, for some purposes, we process your personal data based on our “legitimate interest”. By carrying out a balancing of interests assessment concerning our processing of your personal data, we have concluded that our legitimate interest for the processing outweighs your interests or rights which require the protection of your personal data.

If you want more information in relation to our balancing of interests assessments, please do not hesitate to contact us. Our [contact information](#) can be found at the beginning of this privacy policy.

What are your rights when we process your personal data?

In accordance with the GDPR, you have certain rights that you can exercise to affect how we process your personal data – see below for more information.

If you have any questions regarding your rights or want to exercise any of your rights, please contact us by using the contact details [above](#). You can also find more detailed information about your rights and when they apply at [The Swedish Authority for Privacy Protection \(IMY\)](#).

- **Right to complain** – [Article 77 of the GDPR](#)

You have the right to *submit a complaint* to the competent supervisory authority if you believe that the processing of your personal data violates the GDPR. In Sweden, the competent supervisory authority is the [Swedish Data Protection Authority](#).

- **Right to withdraw your consent** – [Article 7.3 of the GDPR](#)

You have the right to *withdraw your consent* at any time by contacting us using the contact details above. If you choose to consent on the Website, you can always withdraw your consent directly on the Website.

- **Right of access ("right to register extract")** – [Article 15 of the GDPR](#)

You have the right to *obtain confirmation* as to whether we are processing your personal data or not. You can make a request by contacting us by using the contact details above. If we are processing your personal data, you also have the right to *obtain a copy of the personal data* processed by us as well as *information about our processing*, such as the purposes of the processing and for how long your personal data is stored.

- **Right to object** – [Article 21 of the GDPR](#)

You have the right to at any time object to our processing of your personal data for direct marketing purposes (including profiling) and to processing of your personal data that is based on a legitimate interest.

- **Right to rectification of processing** – [Article 16 of the GDPR](#)

You have the right to have *inaccurate personal data concerning you rectified* without undue delay. You also have the right to have *incomplete personal data completed*.

- **Right to erasure ("the right to be forgotten")** – [Article 17 of the GDPR](#)

Under certain circumstances, you have the right to *have your personal data deleted* by us without undue delay. For example, if you [withdraw your consent](#) and there is no other legal basis for the processing, or if the personal data is no longer necessary for the purposes for which it was collected or processed.

- **Right to restriction of processing** – [Article 18 of the GDPR](#)

Under certain conditions, you have the right to request that we restrict our processing of your personal data. For example, if you contest the accuracy of the personal data, or if

the processing is unlawful and you oppose the erasure of the personal data and instead request the restriction on the use of the personal data.

- **Right to data portability – [Article 20 of the GDPR](#)**

If we process your personal data based on your consent, you have the right to *receive personal data concerning you*. This right applies to personal data that you have provided to us in a structured, commonly used, and machine-readable format. You also have the right to *transmit those personal data* to another controller, where technically feasible.

This privacy policy was last updated by CarbonZero AB on 2026-02-24