

Privacy Policy

Website, Marketing & External Communications

Company Name:	Shiftic AB
Policy Owner(s):	COO
Effective Date:	2 April 2026

Shiftic is committed to respecting your rights and preferences regarding data privacy.

Shiftic AB (“us”, “we” or “our”) collects and processes personal data when you interact with us outside of the Shiftic platform — for example when you visit our website, sign up to a newsletter, register for an event, or contact us directly.

This Privacy Notice explains who we are, what personal data we collect, how we use it, and your rights under the General Data Protection Regulation (GDPR). If you are an end-user of the Shiftic platform via your employer or organisation, please refer to our separate End-User Privacy Notice.

We only use your personal data for the purposes described in this Privacy Notice and not in any manner incompatible with those purposes.

Questions? Contact us using the details at the end of this notice.

Who We Are

Shiftic AB, reg. no. 559451-2666, is the data controller for the personal data described in this Privacy Notice. We are a Swedish company providing an AI-powered platform for behaviour change and organisational transformation.

Contact: legal@shiftic.com | shiftic.com

How We Process Your Personal Data and For What Purposes

We process personal data for the following purposes:

- To operate and improve our website
- To respond to contact form submissions and enquiries
- To send the Community newsletter to subscribers
- To send the Investor newsletter to investors and prospective investors
- To manage event registration and event-related communications
- To prevent fraud and other abuse
- To comply with legal obligations
- To establish and defend legal claims

The following sections describe each purpose in detail.

Website visitors and analytics

- **Categories of personal data:** Usage data such as pages visited, time on page, click behaviour, referral source; device data such as IP address, browser type, operating system; HubSpot tracking data.
- **What we do with your personal data:** We process data about how visitors use our website in order to understand user behaviour, improve our content and services, and deliver relevant communications to prospects and leads. We use HubSpot's tracking tools for this purpose.
- **What legal basis do we rely on:** Processing is based on our legitimate interest in understanding and improving how our website performs and in identifying prospective customers. Where tracking involves cookies beyond strictly necessary cookies, we rely on your consent via our cookie banner.
- **How long will the data be stored:** Website usage data is retained for up to 13 months from the date of collection, in line with standard analytics retention practices.

Contact form submissions

- **Categories of personal data:** Name, email address, company name, job title, and any information you include in your message.
- **What we do with your personal data:** We process your personal data in order to respond to your enquiry and, where relevant, to follow up on a potential business relationship.
- **What legal basis do we rely on:** Processing is based on our legitimate interest in responding to inbound enquiries and developing business relationships. We assess that this interest outweighs your interest in privacy, given that you have actively chosen to contact us.



- **How long will the data be stored:** Contact data is retained for up to 24 months from the date of submission, or longer if a business relationship develops.

Community newsletter — direct sign-up

- **Categories of personal data:** Name and email address; any additional profile information you choose to provide at sign-up.
- **What we do with your personal data:** We send you newsletters, product updates, educational content, and other communications relevant to organisational learning, change management, and the Shiftic platform.
- **What legal basis do we rely on:** Processing is based on your consent, given at the point of sign-up via our subscription form. You may withdraw your consent at any time by clicking the unsubscribe link in any newsletter or by contacting us directly.
- **How long will the data be stored:** Personal data is retained for as long as you remain a subscriber. If you unsubscribe, your data will be removed from our active mailing list within 30 days. We may retain a suppression record to honour your opt-out.

Community newsletter — via event registration

- **Categories of personal data:** Name and email address collected at the point of event registration.
- **What we do with your personal data:** Where you register for a Shiftic event, we may add you to our Community newsletter on the basis that the newsletter content is directly relevant to the subject matter of the event you attended. You will be informed of this at the point of registration and will receive an easy opt-out in your first newsletter.
- **What legal basis do we rely on:** Processing is based on our legitimate interest in communicating with people who have shown an active interest in our work. We assess that this interest outweighs your interest in privacy, given the direct relevance of the content and your right to opt out at any time.
- **How long will the data be stored:** As above: retained while you remain a subscriber. You may opt out at any time.

Investor newsletter

- **Categories of personal data:** Name, email address, and company or fund affiliation.

- **What we do with your personal data:** We send periodic updates to our existing investors and, where relevant, to prospective investors with whom we have an established relationship. These communications include business updates, financial highlights, and company news.
- **What legal basis do we rely on:** Processing is based on our legitimate interest in keeping investors informed about the development of Shiftic AB. Investor newsletter recipients are existing contacts with a direct relationship to the company. We assess that this interest outweighs your interest in privacy.
- **How long will the data be stored:** Investor contact data is retained for as long as the investor relationship is active, or for up to five years following the end of that relationship, unless legal obligations require longer retention.

Event registration and communications

- **Categories of personal data:** Name, email address, job title, employer, and any additional information provided at registration (e.g. dietary requirements, accessibility needs).
- **What we do with your personal data:** We process your data to manage your registration, communicate event logistics, and follow up after the event. Where you provide accessibility or dietary information, this is used solely for the purpose of accommodating your needs at the event.
- **What legal basis do we rely on:** Processing is based on our legitimate interest in organising and delivering events, and in following up with participants. Where special category data is involved (e.g. dietary requirements that may reveal health or religious information), processing is based on your explicit consent given at registration.
- **How long will the data be stored:** Event registration data is retained for up to 24 months following the event, or for as long as a business relationship exists.

Fraud prevention and abuse

- **Categories of personal data:** Contact information such as name and email address; usage data such as IP address, browser type, and behaviour on our website.
- **What we do with your personal data:** We process personal data to prevent fraud, spam, and misuse of our website and contact channels.

- **What legal basis do we rely on:** Processing is necessary for our legitimate interest in protecting our services and ensuring they are used as intended.
- **How long will the data be stored:** Retained for up to 12 months, unless specific circumstances require longer retention.

Legal obligations

- **Categories of personal data:** Contact information and any data relevant to the applicable legal obligation.
- **What we do with your personal data:** We process personal data where required to comply with applicable law, including the Swedish Accounting Act, tax legislation, or in response to requests from competent authorities.
- **What legal basis do we rely on:** Processing is necessary to comply with a legal obligation to which Shiftic AB is subject.
- **How long will the data be stored:** Retained for as long as required by applicable law. Data subject to the Swedish Accounting Act is retained for seven years.

Establishing and defending legal claims

- **Categories of personal data:** Any personal data relevant to the legal claim in question.
- **What we do with your personal data:** Where a dispute arises, we may need to process personal data to establish, exercise, or defend a legal claim.
- **What legal basis do we rely on:** Processing is necessary for the purposes of our legitimate interests in protecting our legal position. We assess that this interest outweighs your interest in privacy in the context of an active or potential legal dispute.
- **How long will the data be stored:** Retained for as long as claims can legally be made against us. The general limitation period in Sweden is ten years under the Act on Limitations.

How We Collect Personal Data

We collect personal data directly from you in the following ways:

- When you visit our website (shiftic.com) and interact with its content



- When you submit a contact form
- When you sign up to one of our newsletters
- When you register for a Shiftic event
- When you correspond with us by email

We do not collect personal data from third-party data brokers or purchased lists.

Cookies and Tracking Technologies

Our website uses cookies and similar tracking technologies. We use HubSpot tracking to understand how visitors interact with our site and to identify leads.

Strictly necessary cookies are set without your consent as they are required for the website to function. All other cookies, including analytics and marketing cookies, are only set with your consent via our cookie banner.

You can withdraw your cookie consent at any time by adjusting your browser settings or by using the cookie preference controls on our website.

Do We Share Your Personal Data?

We may share personal data with trusted third parties under data processing agreements that ensure your data is handled in accordance with applicable law.

We may share data with:

- HubSpot, Inc. — for CRM, email marketing, and website analytics
- Email delivery service providers — for sending newsletters and event communications
- Event platform providers — where applicable for event registration management

In certain circumstances, we may also disclose personal data to authorities where required by law, or to third parties in connection with legal proceedings or business transactions.

We will not sell your personal data.

Where Do We Process Your Personal Data?

We aim to process personal data within the EU/EEA. However, some of our third-party service providers (including HubSpot, Inc.) are based in the United States and may process data outside the EU/EEA.

Where personal data is transferred to third countries, we ensure that appropriate safeguards are in place, such as the European Commission's Standard Contractual Clauses (SCCs), or that the transfer is otherwise permitted under Article 46 or 49 of the GDPR.

Your Rights Under the GDPR

As data controller, we are responsible for ensuring you can exercise your rights. You may contact us at any time using the details below. We will respond within one month, with a possible extension of two months for complex requests.

You have the right to:

- Know what personal data we hold about you
- Request correction of inaccurate or incomplete data
- Request erasure of your data (where it is no longer necessary or where you withdraw consent)
- Restrict or object to specific processing of your data
- Withdraw consent at any time, where processing is based on consent
- Receive your data in a portable, machine-readable format
- Lodge a complaint with the Swedish Data Protection Authority (Integritetsskyddsmyndigheten, imy.se)

How Do We Protect Your Personal Data?

We have implemented appropriate technical and organisational security measures to protect your personal data against unauthorised access, disclosure, alteration, or destruction.

Should a security breach occur that may materially affect you, we will notify you in accordance with our obligations under applicable law.

Changes to This Privacy Notice

We may update this Privacy Notice from time to time. Where changes are not purely editorial, we will notify you before the changes take effect. The current version is always available at shiftic.com.

Contact Details

For questions about this Privacy Notice, our data processing practices, or to exercise your rights, please contact:

Shiftic AB, reg. no. 559451-2666

Email: legal@shiftic.com

Website: shiftic.com

Version	Date	Description	Author	Approved by
1.0	14 mar 2024	Initial policy	Sveinung Skaalnes	Marcus Woxneryd
1.1	2 apr 2026	Name change	Sveinung Skaalnes	Marcus Woxneryd