

## Privacy Notice

Last Updated 29 September 2019

Thank you for choosing to be part of our community at Grace Sverige AB ("company", "we", "us", or "our"). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us at [hello@getgrace.co](mailto:hello@getgrace.co).

When you visit our website [www.getgrace.se](http://www.getgrace.se), Facebook application, and use our services, you trust us with your personal information. We take your privacy very seriously. In this privacy notice, we describe our privacy policy. We seek 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. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy policy that you do not agree with, please discontinue use of our Sites or Apps and our services.

This privacy policy applies to all information collected through our website (such as [www.getgrace.se](http://www.getgrace.se)), Facebook application, ("Apps"), and/or any related services, sales, marketing or events (we refer to them collectively in this privacy policy as the "Sites").

**Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.**

### 1. What information do we collect?

#### Personal information you disclose to us

**In Short:** *We collect personal information that you provide to us such as name, address, contact information, passwords and security data, payment information, and social media login data.*

We collect personal information that you voluntarily provide to us when expressing an interest in obtaining information about us or our products and services, when participating in activities on the Sites or Apps or otherwise contacting us.

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

**Name and Contact Data.** We collect your first and last name, email address, postal address, phone number, and other similar contact data.

**Credentials.** We collect passwords, password hints, and similar security information used for authentication and account access.

**Payment Data.** We collect data necessary to process your payment if you make

purchases, such as your payment instrument number (such as a credit card number), and the security code associated with your payment instrument. All payment data is stored by our payment processor and you should review its privacy policies and contact the payment processor directly to respond to your questions.

**Financial Data.** We obtain your financial data provided with your consent from a licensed AISP third-party provider. This includes financial transactions, balances, identity and investments that we securely store to calculate your risk-profile and is never shared with a third-party.

**Social Media Login Data.** We provide you with the option to register using social media account details, like your Facebook, Twitter or other social media account. If you choose to register in this way, we will collect the Information described in the section called "HOW DO WE HANDLE YOUR SOCIAL LOGINS" below.

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 IP address and/or browser and device characteristics – is collected automatically when you visit our Sites or Apps.*

We automatically collect certain information when you visit, use or navigate the Sites or Apps. 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 Sites or Apps and other technical information. This information is primarily needed to maintain the security and operation of our Sites or Apps, and for our internal analytics and reporting purposes.

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

#### Information collected through our Apps

**In Short:** *We may collect information regarding your and Facebook permissions when you use our apps.*

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

**Facebook Permissions.** We by default access your Facebook basic account information, including your name, email, gender, birthday, current city, and profile picture URL, as well as other information that you choose to make public. We may also request access to other permissions related to your account, such as friends, check-ins, and likes, and you may choose to grant or deny us access to each individual permission. For more information regarding Facebook permissions, refer to the Facebook Permissions Reference page.

#### Information collected from other sources

**In Short:** *We may collect limited data from public databases, marketing partners, social media platforms, and other outside sources.*

We may obtain information about you from other sources, such as public databases, joint marketing partners, social media platforms (such as Facebook), as well as from other third parties. Examples of the information we receive from other sources include: social media profile information (your name, gender, birthday, email, current city, state and country, user identification numbers for your contacts, profile picture URL and any other information that you choose to make public); marketing leads and search results and links, including paid listings (such as sponsored links).

### 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 Sites or Apps for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests ("Business Purposes"), in order to enter into or perform a contract with you ("Contractual"), with your consent ("Consent"), and/or for compliance with our legal obligations ("Legal Reasons"). We indicate the specific processing grounds we rely on next to each purpose listed below.

#### 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 a 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. See the section below headed "HOW DO WE HANDLE YOUR SOCIAL LOGINS" for further information.

**To send you marketing and promotional communications.** We and/or our third-party marketing partners may use the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt-out of our marketing emails at any time (see the "WHAT ARE YOUR PRIVACY RIGHTS" below).

**Deliver targeted advertising to you.** We may use your information to develop and display content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness.

**For other Business Purposes.** We may use your information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Sites or Apps,



products, services, marketing and your experience.

### 3. Will your information be shared with anyone?

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

We may process or share data based on the following legal basis:

**Consent:** We may process your data if you have given us specific consent to use your personal information in 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 fulfill the terms of our contract.

**Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

**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:

**Vendors, Consultants and Other Third-Party Service Providers.** We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Sites or Apps, which will enable them to collect data about how you interact with the Sites or Apps over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity. Unless described in this Policy, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.

**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.

**Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy

policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.

### 4. Who will your information be shared with?

**In Short:** *We only share information with the following third parties.*

We only share and disclose your information with the following third parties. We have categorized each party so that you may be easily understand the purpose of our data collection and processing practices.

If we have processed your data based on your consent and you wish to revoke your consent, please contact us.

#### Advertising, Direct Marketing, and Lead Generation

Facebook Audience Network, Google AdSense, Snapchat

#### Allow Users to Connect to their Third-Party Accounts

Facebook account

#### Communicate and Chat with Users

Facebook Customer Chat, Buffer, Slack, Typeform

#### Functionality and Infrastructure Optimisation

Kickofflabs, Zapier

#### Retargeting Platforms

Google Ads Remarketing and Facebook Remarketing

#### Social Media Sharing and Advertising

Facebook advertising

#### User Account Registration and Authentication

Facebook Login

#### Web and Mobile Analytics

Google Analytics

#### Website Hosting

Amazon Web Services

### 5. 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 Policy.

### 6. How do we handle your social logins?

**In Short:** *If you choose to register or log in to our websites using a social media account, we may have access to certain information about you.*

Our Sites or Apps offer you the ability to register and login using your third-party social media account details (like your Facebook or Twitter logins). Where you choose to do this, we will receive certain profile information about you from your social media provider. The profile information we receive may vary depending on the social media provider concerned, but will often include your name, e-mail address, friends list, profile picture as well as other information you choose to make public. If you login using Facebook, we may also request access to other permissions related to your account, such as friends, check-ins, and likes, and you may choose to grant or deny us access to each individual permission.

We will use the information we receive only for the purposes that are described in this privacy policy or that are otherwise made clear to you on the Sites or Apps. Please note that we do not control, and are not responsible for, other uses of your personal information by your third-party social media provider. We recommend that you review their privacy policy to understand how they collect, use and share your personal information, and how you can set your privacy preferences on their sites and apps.

### 7. Is your information transferred internationally?

**In Short:** *We may transfer, store, and process your information in countries other than your own.*

Our servers are located in Sweden. If you are accessing our Sites or Apps from outside Sweden, please be aware that your information may be transferred to, stored, and processed by us in our facilities and by those third parties with whom we may share your personal information (see "WILL YOUR INFORMATION BE SHARED WITH ANYONE?" above), in United States, and other countries.

If you are a resident in the European Economic Area, then these countries may not have data protection or other laws as comprehensive as those in your country. We will however take all necessary measures to protect your personal information in accordance with this privacy policy and applicable law.

#### EU-U.S. Privacy Shield Framework:

In particular Grace Sverige AB complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States and has certified its compliance with it. As such, Grace Sverige AB is committed to subjecting all personal information received from European Union (EU) member countries, in reliance on the Privacy Shield Framework, to the Framework's applicable Principles. To learn more about the Privacy Shield Framework, visit the U.S. Department of Commerce's Privacy Shield List.

Grace Sverige AB is responsible for the processing of personal information it receives, under the Privacy Shield



Framework, and subsequently transfers to a third party acting as an agent on its behalf.

With respect to personal information received or transferred pursuant to the Privacy Shield Framework, Grace Sverige AB is subject to the regulatory enforcement powers of the U.S. FTC. In certain situations, we may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

## 8. How long do we keep your information?

**In Short:** *We keep your information for as long as necessary to fulfill the purposes outlined in this privacy policy 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 this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this policy will require us keeping your personal information for longer than 2 years.

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

## 9. 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, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Sites or Apps is at your own risk. You should only access the services within a secure environment.

## 10. Do we collect information from minors?

**In Short:** *We do not knowingly collect data from or market to children under 13 years of age.*

We do not knowingly solicit data from or market to children under 13 years of age. By using the Sites or Apps, you represent that you are at least 18. 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 have collected from children under age 13, please contact us at [hello@getgrace.co](mailto:hello@getgrace.co).

## 11. What are your privacy rights?

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

In some regions (like the European Economic Area), 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.

If you are resident in the European Economic Area 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: [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm)

**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 Sites or Apps. To opt-out of interest-based advertising by advertisers on our Sites or Apps visit <http://www.aboutads.info/choices/>.

## 12. 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. 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 Policy.

## 13. Do we make updates to this policy?

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

We may update this privacy policy 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 policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

## 14. How can you contact us about this policy?

If you have questions or comments about this policy, you may contact our Data Protection Officer (DPO), by email at [hello@getgrace.co](mailto:hello@getgrace.co).

## 15. How can you review, update or delete the data we collect from you?

Based on the laws of some countries, 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 submit a request by emailing [hello@getgrace.co](mailto:hello@getgrace.co).

We will respond to your request within 30 days.