

## **DATA PROTECTION REGULATION POLICY FOR EPICENTER**

- Adopted and updated on May25th, 2018

As of 25 May 2018, a new data protection regulation (GDPR) will be introduced in accordance with EU / EEA directives.

We at EP Center Management AB, organization number 556919-8657 ("Epicenter") therefore wants to make it clear how we work with your privacy and explain to you your rights regarding your personal information.

This Privacy Policy describes the information we collect, the purpose and purpose for which they are collected, the legal basis for our treatment, the way in which you can control your own information and how to contact us. This Privacy Policy applies when you register as a member of us or when using our services provided through our guest portal, member portal, using our IT network or our website (hereinafter referred to as our "service")

Epicenter is a personally responsible person in accordance with these terms and is responsible for processing according to current legislation. It is important that you read and understand our privacy policy before using the Service.

All processing of personal data within Epicenter is in accordance with applicable privacy laws.

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### **1. Definitions**

A personal data is an enlightenment that can be linked directly or indirectly to another living person to another person. Examples of personal data are name, address, phone number, social security number and e-mail address. Information about the IP number and your user activity regarding the use of the Service may also constitute personal data.

Personal data processing includes all handling of personal data, such as collection, analysis, modification, registration and storage.

## **2. Data being processed**

The personal information Epicenter needs to offer you a good service and we treat you as a visitor or member of us are:

Name

Address

Phone number

E-mail address

Title

In some cases, personal identification numbers

Company name including organization number

billing address

IP address and MAC address when using our network

In case you provide additional information to us, we will process it according to the same policy.

Epicenter needs the above information in order to fulfill our commitments to you, whether you visit us as a guest or a member. In case you choose to join us and also create a user account at Epicenter, Epicenter will save the above information about you for this purpose too. Some information is automatically retrieved when using the web or web portal and creates a user account, including: Information about your use, e.g. how you navigate and what pages you have visited, technical data about the devices you use to access the Service as, IP Address, Hardware Type, Operating System, and Browser Version, and Geographic Information.

## **3. It is important for us that you understand your rights.**

You have a wide range of rights regarding the information we collect about you. Below we describe these.

### Right to information

You are entitled to request and confirm whether Epicenter is processing personal information about you. If Epicenter processes personal information about you, you are entitled to receive free information on the treatment and a copy of the personal data being processed.

### Right to rectification

You are entitled to receive incorrect personal information about you without undue delay. Depending on the purpose of the treatment, you also have the right to supplement incomplete personal data.

### Right to erasure

You may, in some cases, have the right to have your personal information deleted:

1. If personal data is no longer necessary for the purposes for which they were collected
2. If the processing is based on your consent, you are entitled to withdraw your consent at any time and then the right to delete the data.
3. If personal data has been processed illegally or they must be deleted due to legal obligation;

However, the right to erase is not applicable in some cases, for example. if treatment is necessary for Epicenter to comply with a legal obligation or for Epicenter to be able to determine, claim or defend legal claims.

#### Right to restriction

In some cases, you may request that Epicenter limit the processing of your personal data, such as if you do not believe that your personal information is accurate so that Epicenter has time to check this, if the treatment is illegal and you do not want us to delete the data, if Epicenter no longer needs the information but you need them for legal claims or if you object to Epicenter's treatment based on a balance of interest pending verification of the legitimate reasons of Epicenter or third party weightier than your legitimate reasons.

#### Right to object

You are entitled to object to the processing of your personal data at any time based on a balance of interest, including profiling. Epicenter may not continue to process such personal data unless Epicenter can not provide compelling legitimate reasons for such treatment that weighs heavier than your interests, rights and freedoms. However, epicenter may continue treatment for the determination, exercise or defense of legal claims. If you oppose direct marketing treatment based on a balance of interest, Epicenter may no longer process your personal information for such purposes. You can at any time refrain from receiving marketing communications from us by clicking "unsubscribe" in the email we send you.

#### Right to file a complaint with the Data Protection Authority (Datainspektionen)

If you believe that your rights are not respected by us, please contact us and you also have the right to file a complaint with the Data Inspectorate

### **4. Purpose of our treatment and legal basis**

We process personal data for the purposes set out below, as well as any additional purposes specified at the time of collection:

- To provide our service to you as a guest or member, and to manage our agreement with you, including the creation and administration of your user account (if you choose to create a user account) and become a member;
- In order for you as a guest to be able to search for the member or meeting referred to;
- To ensure the technical functionality of our member portal;
- To improve and develop our service and new services and products;
- to continuously improve the security of our networks and information systems, as well as to analyze your and other users' use of the Service (such as which mobile device or equipment you use) to better understand how our customers interact and use the Service;
- To send newsletters by email to you;
- In order to invite you to events, lectures and joint member activities;
- For marketing purposes, including marketing of our offers and services, as well as our Group Company's products and services, via e-mail (which you can choose via a link in each mail-out mail)
- To check, prevent, investigate or take other actions in connection with abuse of our service or in connection with the use of the Service in violation of the Terms

of Service or Membership Terms or Legal Procedures, suspected fraud or potential threats against Epicenter or rights of others;

- To fulfill legal obligation.

#### Legal basis for Epicenter processing of your personal data

Necessary treatment to fulfill our agreement with you.

Epicenter is processing your personal information in order to fulfill our agreement with you as a member.

#### Necessary treatment for purposes related to the legitimate interests of Epicenter or third parties (interest weighting)

In cases where treatment is necessary for purposes related to the legitimate interests of Epicenter or third parties, Epicenter may process your personal data with the help of a balance of interest. Such interests include Epicenter's commercial interest in maintaining a good customer relationship with you, providing you with information relevant to your use of the Service, improving and further developing the Service, as well as promoting Epicenter's products and services. Thus, "legitimate interests" means our interest in conducting and managing our business to enable us to provide you with the best possible service and a good and safe user experience. For example, we have a legitimate interest in ensuring that your marketing is relevant to you, so we can process your personal information to tailor your marketing to your interests, such as type of member activities or events that you may be interested in. Eligible interests may also refer to treatment that is also in your own or third party's interest. We may process your personal information to protect you (and other customers, suppliers and partners) from fraud, intrusion and other irregularities in the use of our Services and to ensure that our Services and Systems are secure. When we process your personal information based on a balance of interests, we ensure that we take into account and balance the possible impact of the treatment on you (both positive and negative) as well as your interests and rights under applicable data protection legislation. In case you have any objections or objections to our treatment based on a balance of interests, you are entitled to object to such treatment at any time.

For more information about your rights, please see the information under the heading "3. It is important for us to understand your rights."

#### Treatment with the express consent

Epicenter may also process personal information with the express consent of you. (such as receiving newsletters or email regarding marketing)

#### Treatment necessary to fulfill a legal obligation

Epicenter may need to process personal data in order to fulfill legal obligations, such as for accounting purposes or as a result of a court or government decision.

It may happen that the same personal data is processed for multiple purposes and / or based on more than one of the legal grounds mentioned above.

### **5. Security and Transfer of Personal Data**

Transfer of personal data within Epicenter's group company.

Your personal information may be disclosed to other companies within the Epicenter Group to independently process your personal information for the purpose of presenting information

and enhancing your user experience in marketing or visits to other local Epicenter buildings. Examples of such information may be member information containing contact information, social security number and company membership. The aim is that you as a member should be free to visit other Epicenter buildings without re-registering. Should you be contacted by any of these companies, it will inform you about the personal data policy that applies to the proper processing of data within that company.

#### Transfer of personal data to third parties

We will not divulge, sell, transfer or otherwise disclose personal data beyond the terms of this Privacy Policy, unless we are required to do so by law or as a result of a court order or if we have received your consent to such disclosure.

Epicenter may disclose personal data to third parties, such as the police or other authority, in the case of suspected crime investigations or if we are otherwise required to provide such information on the basis of law or authority decision.

Epicenter can hire external providers to perform tasks on behalf of Epicenters, eg. to provide IT services, update address information or help with marketing and analysis. The execution of these services may mean that Epicenter's suppliers, both within the EU / EEA and outside the EU / EEA, have access to your personal information. These suppliers process personal data on our behalf in accordance with written personal data agreement and our instructions. Personal Data Advisers who access your personal information (for example, if we use a third party to store information on a server), are not given a right to use your personal information for purposes other than the purposes stated in this Privacy Policy, but will primarily be used to the extent necessary to provide our service.

#### Transfer of personal data to third countries

Epicenter only collaborates with partners handling personal data within the EU / EEA. In case Epicenter chooses to hire suppliers outside the EU / EEA, eg. cloud service providers, Epicenter will in this case take special safeguards such as signing agreements that include standardized data transfer clauses that have been adopted by the EU Commission and are available on the EU Commission website or company that maintains the same level of protection as within the EU / EEA through that for example have joined the so-called Privacy Shield Agreement between the EU and the United States.

#### Security for the protection of personal data

Epicenter protects your privacy and ensures a high level of security for your personal data. Epicenter has taken appropriate security measures to protect your personal data from unauthorized access, modification, dissemination or destruction. All processing of your personal information is subject to strict confidentiality.

### **6. Storage and deletion of personal data**

The treatment is in accordance with current legislation and means that personal data are not stored for a longer period than necessary for the purpose of the treatment. We will store your personal information as long as you choose to be a member of us or, if you visit us as a guest for 12 months after the visit. If you cancel your membership, your information will be saved in accordance with the requirements of the Accounting act. If you subscribe to our newsletter, your contact information will be retained as long as you choose to continue receiving the

newsletter. For marketing purposes, only necessary contact information is used not older than 12 months after you ceased to be a customer at Epicenter. This means purely practical that data is deleted and erased as they are no longer relevant or necessary for the purposes for which they have been collected. Some information may be retained longer as required by other legal requirements, such as the accounting law.

The same personal data can be stored in several different locations for different purposes. This may mean that a task that has been deleted from a system because it is no longer necessary may remain in another system where it is stored on the basis of another legal basis or for another purpose where the personal data is still needed.

## **7. Cookies**

When you visit our website, we use cookies and similar tracking techniques. Learn more about using cookies and the like in our Cookie Policy. (attached)

## **8. Links to other sites or media outside our own website.**

In cases where the Service refers to a website or material belonging to a third party, such reference is intended solely as a service for the user and the Epicenter disclaims all responsibility for it and its possible personal data processing.

## **9. Changes to this Data Protection Regulation Policy**

In the event that we make changes to this Policy, we will disclose this by clearly mentioning this in the headline.

## **10.Regulation and dispute resolution**

Processing of your personal data under this Privacy Policy and your use of the Service shall be interpreted in accordance with Swedish law. Disputes shall be settled by the Swedish General Court unless otherwise required by law.

## **11. Contact information**

For further information about personal data management or if you have any questions, feel free to contact us at:

## **12. Appendix - COOKIE POLICY FOR EPICENTER**

This is the Cookie Policy for Epicenter, accessible from [www.epicenterstockholm.com](http://www.epicenterstockholm.com)

### **What Are Cookies**

As is common practice with almost all professional websites this site uses cookies, which are tiny files that are downloaded to your computer, to improve your experience. This page describes what information they gather, how we use it and why we sometimes need to store these cookies. We will also share how you can prevent these cookies from being stored however this may downgrade or 'break' certain elements of the sites functionality.

For more general information on cookies see the Wikipedia article on HTTP Cookies.

### **How We Use Cookies**

We use cookies for a variety of reasons detailed below. Unfortunately in most cases there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to this site. It is recommended that you leave on all cookies if you are not sure whether you need them or not in case they are used to provide a service that you use.

### **Disabling Cookies**

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will affect the functionality of this and many other websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features of the this site. Therefore it is recommended that you do not disable cookies.

### **The Cookies We Set**

Login related cookies:

We use cookies when you are logged in so that we can remember this fact. This prevents you from having to log in every single time you visit a new page. These cookies are typically removed or cleared when you log out to ensure that you can only access restricted features and areas when logged in.

### **Third Party Cookies**

In some special cases we also use cookies provided by trusted third parties. The following section details which third party cookies you might encounter through this site.

- This site uses Google Analytics which is one of the most widespread and trusted analytics solution on the web for helping us to understand how you use the site and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content.

For more information on Google Analytics cookies, see the official Google Analytics page.

- From time to time we test new features and make subtle changes to the way that the site is delivered. When we are still testing new features these cookies may be used to ensure that you receive a consistent experience whilst on the site whilst ensuring we understand which optimisations our users appreciate the most.
- The Google AdSense service we use to serve advertising uses a DoubleClick cookie to serve more relevant ads across the web and limit the number of times that a given ad is shown to you.

For more information on Google AdSense see the official Google AdSense privacy FAQ.

### **More Information**

Hopefully that has clarified things for you and as was previously mentioned if there is something that you aren't sure whether you need or not it's usually safer to leave cookies enabled in case it does interact with one of the features you use on our site.

However if you are still looking for more information then you can contact us at:

- Email: [hello@epicenterstockholm.com](mailto:hello@epicenterstockholm.com)