

PRIVACY POLICY

Ionautics AB

We care about individual privacy.

Table of Contents

1.	Privacy policy.....	3
2.	Our processing of personal data	3
3.	From where do we collect the personal data?.....	5
4.	Who has access to the personal data?.....	5
5.	How long do we store personal data?	5
6.	Is any transfer made to a third country?	7
7.	What technical and organizational security measures have been implemented?.....	7
8.	Do we engage in automated decision-making?	7
9.	What are your rights as the data subject?	7
10.	Contact details	8

1. PRIVACY POLICY

Ionautics AB, reg. no. 556818-9566, having its registered address at Kabelgatan 9 B, 943 31, Öjebyn, Sweden, is controller of the processing of personal data described in this privacy policy. This means we are responsible for ensuring that the personal data are processed correctly and in accordance with current data protection legislation.

When various people, e.g. customers or their representatives, business partners and consultants, suppliers or universities, have contact with us in conjunction with our business, personal data will be provided to us or obtained by us. Moreover, anyone who applies to work for us, visits our offices, communicates with us, signs up for newsletters, enrolls for events or in any other way come in contact with us will provide us with personal data.

We describe below how we collect, process and share personal data in these cases. Further down, we also provide information about the rights that you have as data subject in relation to us as controller and our contact details.

It is important to know that you are not required to provide all personal data identified in this privacy policy to use our site or to interact with us offline, but certain functionality will not be available if you do not provide personal data. If you do not provide personal data, we may not be able to respond to your request, conduct business or collaboration with you, or provide you with marketing that we believe you would find valuable.

2. OUR PROCESSING OF PERSONAL DATA

The main purpose of our processing of personal data is to perform contractual obligations with our clients, business partners and suppliers. Please see the below table for our purposes of processing personal data, categories of personal data and the legal basis for our processing of personal data.

Purposes of processing	Categories of personal data	Legal basis
Fulfil and administer our agreed and contractual commitments with clients and business partners.	In relation to clients' representatives, business partners and consultants etc. we process contact details (name, title, employer, postal address, telephone number and email address), identification details of signatories of our contracting partners (date of birth/ID number) and invoicing information of our contracting partner (account number and tax details).	Legitimate interest in conducting our business and performing our contractual obligations.
Manage and administer our relationships with suppliers and other external parties.	In relation to the suppliers' representatives and consultants etc. we process contact details (name, title,	Legitimate interest in administering the relationship and

	employer, postal address, telephone number and email address), identification details (date of birth/ID number) and invoicing information of our contracting partner (account number and tax details).	performing our contractual obligations.
Manage the process with clients and business partners before entering a binding contract, for example when drafting and negotiating NDAs.	Contact details (name, title, employer, postal address, telephone number and email address) and identification details (date of birth/ID number).	Legitimate interest to administer potential clients and business partners and to secure confidential information related to our business.
Marketing and communication purposes, e.g. send invitations and administer events, send newsletters, annual reports and similar marketing material and/or maintain our contact register.	Contact details (name, title, employer, postal address, telephone number and email address), job title and workplace. We may process personal data in the form of photographs and sound and image recordings. When people enroll for events, we also process details of food preferences provided in conjunction with enrolment.	Legitimate interest in maintaining our business contacts, communicating about our business and our events, and to arrange and administer events.
Marketing and client analyses, business and methodology development, and statistical purposes.	Data related to our business, e.g. clients' and business partners' settings and responses from our clients, business partners and universities.	Legitimate interests of developing our business.
Recruitment purposes, e.g. administer our recruitment process and evaluate applicants, to manage certain legal aspects of recruitment, and to be able to inform applicants of future career opportunities.	Contact details (name, title, employer, postal address, telephone number and email address), identification details (date of birth/ID number), education and work experience (job titles, degrees, employment history and form of employment), communication (personal data in written and oral communications between you and us) and in some cases we also obtain personal data from public sources such as universities and similar.	Legitimate interest in managing the recruitment process.
Manage and administer visits, e.g. processing of personal data when people visit our offices.	Contact details (name, title, employer, telephone number and email address).	Legitimate interest in managing the visit and maintaining security at our offices.
Address compliance and legal obligations, such as complying with tax reporting obligations, accounting requirements, checking the identity of	Contact details (name, title, employer, postal address, telephone number and email address), identification details (date of birth/ID number) and other communication (personal data in written and oral communications between you and us).	Legal obligations which we have to comply with.

new clients and to prevent money laundering.		
Defend us from or make legal claims (e.g. if you may have a legal claim against us or if we have a legal claim against you).	Contact details (name, title, employer, postal address, telephone number and email address), identification details (date of birth/ID number), contracts and NDAs when applicable and other communication (personal data in written and oral communications between you and us).	Legitimate interest to defend us from or make legal claims.

Miscellaneous

Much of our communication takes place via telephone or video calls and email, which essentially always entail processing of personal data. As a rule, those who call, take part in video calls or send emails to us provide personal data that can be attributed to individuals.

3. FROM WHERE DO WE COLLECT THE PERSONAL DATA?

We mainly collect personal data direct from the individuals concerned, but during engagements we sometimes receive information about individuals involved that does not come direct from data subjects, e.g. when we receive personal data of representatives from our contracting party (normally clients and business partners).

4. WHO HAS ACCESS TO THE PERSONAL DATA?

We may share personal data with our suppliers and service providers to enable such parties to perform functions on our behalf and under our instructions, for example our IT services providers, finance systems, consultants who provide us with support in respect of business analytics and marketing campaigns. We require such parties by contract to provide reasonable security for personal data and to use and process such personal data on our behalf only. Further, we share personal data with financial institutions in connection with invoicing and payments.

We also share personal data to comply with tax reporting obligations, comply with any court order or other legal process, to comply with a governmental request or any other legally enforceable demand. We also share personal data to establish or protect our legal rights or safety, or to defend us against legal claims.

If you have questions about the parties with which we share personal data, please contact us as specified below.

5. HOW LONG DO WE STORE PERSONAL DATA?

We do not save personal data longer than necessary given the purpose of the processing, unless the data may or must be saved for a longer period under applicable law. We take

every reasonable step to ensure that your personal data only are processed for the minimum period necessary for the purposes set out in this privacy policy.

Purposes of processing	Period of storing
Fulfil and administer our agreed and contractual commitments with clients and business partners.	Saved for at least ten (10) years from the date on which the engagement is completed, or for a longer period as required by the nature of the engagement.
Manage and administer our relationships with suppliers and other external parties.	Saved for at least ten (10) years from the date on which the engagement is completed, or for a longer period as required by the nature of the engagement.
Manage the process with clients and business partners before entering a binding contract, for example when drafting and negotiating NDAs.	Saved for at least ten (10) years from the date on which the engagement is completed, or for a longer period as required by the nature of the engagement.
Marketing and communication purposes, e.g. send invitations and administer events, send newsletters, annual reports and similar marketing material and/or maintain our contact register.	Saved for at least twelve (12) months from the last contact with you. If you unregister yourself from our newsletter or likewise, your personal data will be erased immediately. Details of food preferences are always deleted after the event.
Marketing and client analyses, business and methodology development, and statistical purposes.	Saved for at least two (2) years after the last contact with you.
Recruitment purposes, e.g. administer our recruitment process and evaluate applicants, to manage certain legal aspects of recruitment, and to be able to inform applicants of future career opportunities.	Saved for the duration of the recruitment process (if applicable) and thereafter up to at least two (2) years in order to be able to offer you employment.
Manage and administer visits, e.g. processing of personal data when people visit our offices.	Saved for at least one (1) year after the last contact with you.
Address compliance and legal obligations, such as complying with tax reporting obligations, accounting requirements, checking the identity of new clients and to prevent money laundering.	Saved for at least seven (7) years after the calendar year in which the financial year ended (personal data related to accounting requirements). Personal data related to other legal obligations will be saved in accordance with such legislation from time to time.

Defend us from or make legal claims (e.g. if you may have a legal claim against us or if we have a legal claim against you).	Saved until the end of statute of limitations.
--	--

6. IS ANY TRANSFER MADE TO A THIRD COUNTRY?

Personal data are mainly processed on servers within EU/EEA. We may in order to conduct our services, transfer your personal data to third parties outside the EU/EEA (e.g. local representatives of clients, business partners or third party service providers). In such cases, we will take appropriate measures to ensure an adequate level of protection, e.g. by entering into standard contractual clauses.

7. WHAT TECHNICAL AND ORGANIZATIONAL SECURITY MEASURES HAVE BEEN IMPLEMENTED?

We have implemented appropriate security measures to protect your personal data from unauthorized access, use, modification and dissemination. The processing is carried out in premises with appropriate physical safeguards and IT-systems with appropriate IT-security and the access to personal data to staff and service providers is restricted on a need-to-know basis.

When other legal entities than us, process personal data on our behalf, we ensure that they are bound by a data processing agreement and that we set requirements on security as well as confidentiality in accordance with applicable law.

8. DO WE ENGAGE IN AUTOMATED DECISION-MAKING?

No automated decision-making without human intervention takes place, including profiling.

9. WHAT ARE YOUR RIGHTS AS THE DATA SUBJECT?

If you are in the EU/EEA you have the following rights:

- **Access.** Subject to certain exceptions, you have the right to request a copy of the personal data we are processing about you, which we will provide to you in electronic form. At our discretion we may require you to prove your identity before providing the requested information. If you require multiple copies of your personal data, we may charge a reasonable administration fee.
- **Rectification.** You have the right to require that any incomplete or inaccurate personal data that we process about you is amended.
- **Deletion.** You have the right to request that we delete personal data that we process about you, unless we are required to retain such data to comply with a legal obligation or to establish, exercise or defend legal claims.
- **Restriction.** You have the right to request that we restrict our processing of your personal data where:
 - you believe such data to be inaccurate,

- our processing is unlawful, or
- we no longer need to process such data for a particular purpose, but where we are not able to delete the data due to a legal or other obligation or because you do not want us to delete it.
- **Portability.** You have the right to request that we transmit the personal data we hold in respect of you to another data controller, where this is:
 - personal information which you have provided to us; and
 - we are processing that data on the basis of your consent or in order to perform our obligations under contract to you.
- **Objection.** Where the legal justification for our processing of your personal data is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless we have compelling legitimate grounds for the processing which override your interests and rights, or if we need to continue to process the data for the establishment, exercise or defense of a legal claim.
- **Withdrawing consent.** If you have consented to our processing of your personal data, you have the right to withdraw your consent at any time, free of charge.
- **File a complaint.** If you are in the EU/EEA you also have the right to lodge a complaint with the local data protection authority if you believe that we have not complied with applicable data protection laws.

If you have any questions or complaints about the way we process personal data, or wish to request exercise of rights as described above, you are welcome to contact us by email at info@ionautics.com.

10. CONTACT DETAILS

Ionautics AB, reg. no. 556818-9566

Address: Kabelgatan 9 B, 943 31, Öjebyn, Sweden

Website: <https://ionautics.com/>

Email: info@ionautics.com

This privacy policy may be updated from time to time. It was last updated on 19 October 2022.