

PRIVACY POLICY

We at Insert Coin AB, corp.reg.no 556864-0527, (“**Insert Coin/we**”) are committed to protecting and respecting our customers’ privacy when providing access to Insert Coin’s solution Gamify the World Engine (“**Service**”). The Service allows the user to, amongst other things, manage rewards and achievements by applying gaming activities to the user’s applications and websites. For the avoidance of doubt, when we refer to the “**Service**” in this privacy policy, we also mean any purchases made by the user within the Service.

This privacy policy describes how we collect and use personal data (as defined in the General Data Protection Regulation (EU) 2016/679, the “**GDPR**”) in connection with use of the Service. This privacy policy also describes your rights as a data subject and how to enforce them.

We are responsible for the processing of your personal data as described herein, as a data controller (as defined in the GDPR). Please do not hesitate to reach out to us if you have any questions or comments on our processing of personal data. Reach us by sending an e-mail to support@insertcoin.se or contact us at:

Insert Coin AB
Vasagatan 33
411 37, Gothenburg
Sweden

In some cases, where we process data on behalf of you or your employer as data processors, we will process personal data in accordance with the instructions we have received under the personal data processing agreement we have entered into with you or your employer. That processing is not included in this privacy policy since this policy describes the processing we do as a data controller.

1 PERSONAL DATA THAT WE PROCESS

We process the following categories of personal data about you:

- **User data.** Your username and e-mail address will be processed to provide you access to the Service.
- **Company-related data.** This means information regarding the company you work for, including your work e-mail address. This is applicable when the Service is used by the company you represent or work for.

- **Personal identification number.** If you are a sole trader, we will process your personal identification number as it is the same as your company registration number.
- **Communications data.** We will collect and store your communication with us and any information provided to us in such communication, for example when e-mailing us. Please note that we receive any information you send to us. Because e-mail communications are not always secure, we encourage you to not include sensitive data in your e-mails to us and avoid sharing sensitive data with us.
- **Technical data.** We will collect technical data from the computer (or other device) you use in connection with your use of the Service such as IP address, browser type and version, screen resolution, preferred language, geographic location, operating system and computer platform. Even though we do not normally use technical data to identify individuals, sometimes individuals can be recognized from it.
- **Billing data.** To pay for the Service, you will provide us with your credit card information meaning your name, card number and address (company address if you represent a company).
- **User activity logs.** We save information about your activity in the Service in order to analyze users' use of the Service for improving the Service, but also to enable customer support.

2 HOW WE GATHER YOUR PERSONAL DATA

Information you give to us. Most of the information we process about you is received from you. You may directly or indirectly give us information about yourself in different ways, for example when you or the company you represent subscribe(s) and register(s) for the Service. You can always choose not to provide us with certain information. However, some personal data is necessary in order for us to provide you with the Service. Not providing such personal data may prevent us from providing the Service to you (or the company you represent).

Information we collect about you. We may also, responsibly and with your privacy in mind, obtain personal data about you from your employer or the website of your employer.

3 HOW YOUR PERSONAL DATA WILL BE USED AND THE LEGAL GROUNDS FOR IT

If you have subscribed for the Service (or subscribed for the Service on behalf of the company you represent) we may process your personal data for the following purposes and based on the following legal grounds:

- **To register an account.** We will process your personal data (username, e-mail address) to register an account. This is necessary to enter into a contractual relationship with you or your employer regarding the Service and to pursue our legitimate interests, such as our interest in simplifying the registration process for our users and administering the contractual relationship.
- **To provide the Service.** We will continue to process your personal data (username, e-mail address) to provide the Service to you (or to the company you represent). This is necessary to fulfill our contractual obligations to you or the company you represent with respect to the Service.
- **To communicate with you.** Your contact details (e-mail address) will be used to communicate with you. This processing can either be necessary for us under our contract with you or your employer or for our legitimate interest in effective communication with our customers and business partners.
- **To provide customer support.** Your personal data (e.g. user data, technical data) will when necessary be used to investigate, respond to and resolve complaints and problems with the Service (e.g. bugs). This processing is necessary to provide you with the Service and upholding our obligations under our contract with you or your employer and for our legitimate interest in the functionality of the Service.
- **To conduct customer surveys.** Your contact information may be used to conduct customer surveys. By continuously collecting qualitative feedback from you and other users, we can gain a deeper understanding of our users' problems and needs. This processing is necessary to pursue legitimate interests, such as our interest in developing and improving the Service. Participation in customer surveys is optional.
- **For billing purposes.** Your billing data will be used to bill you (or the company you represent) with one-off invoices or automatically on a recurring basis. This processing is necessary and is based on our legitimate interest of being able to bill.
- **To develop and improve the Service.** We use technical data, user activity logs, survey data, and other aggregated and non-personal information to develop and improve the Service, including troubleshooting, data analysis, research, statistical purposes and testing (such as beta testing and evaluation of new features, in line with the fundamental nature of the Service). For example, we may collect and evaluate technical data about your use of the Service for analytical purposes, to understand how people use the Service in order to make it more intuitive. This processing is partly

necessary to provide the Service to you but mainly to pursue legitimate interests, such as our interest in developing and improving the Service and its features.

- **To market our services.** Your contact information will be used to send newsletters and information about our services to you or your employer. This processing is based on our legitimate interest of being able to market our services. Feel free to follow the unsubscribe instructions contained in the e-mail received from us or contact us directly.
- **To fulfil our legal obligations.** Insert Coin is obliged to follow Swedish law. This means that your personal data will be processed to the extent necessary for us to fulfil our legal obligations, for example book-keeping rules.
- **To protect our legitimate business interests and legal rights.** We will use your personal data where we believe it is necessary to protect and enforce our legal rights, interests and the interests of others, for example in connection with legal claims, compliance, regulatory and audit functions.
- **In connection with a merger or acquisition.** In connection with, due to strategical or business-oriented reasons, a potential merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company, the personal data we retain about you may be processed, shared or transferred, to parties involved in the process. This processing is based on our legitimate interest of being able to develop our business.

4 HOW WE SHARE YOUR PERSONAL DATA

Sometimes, we need to share your personal information with other trusted individuals and companies. Your personal information is shared with:

- **Our employees and consultants.** Your personal data will, when appropriate, be shared with some of our employees and consultants. However, we will restrict access to those of our employees and consultants who need it to perform their jobs, for example to provide you with customer support. Our employees and consultants are of course subject to strict confidentiality.
- **Our service providers.** We transfer to or share your personal data with our subcontractors who help us provide the Service to you which require the processing of personal data. Such subcontractors include Stripe, a provider of online payment solutions.

We provide personal data to third parties solely for the purpose of delivering the Service and to manage our daily operations including marketing of our services. Our subcontractors are not authorized by us to use or disclose your personal data except as necessary to perform services on our behalf or to comply with legal requirements.

- **Authorities and other public actors.** Sometimes legal obligations may require us to share information about you, for example to respond to lawful requests from law enforcement agencies, regulatory agencies, and other public and government authorities. We may also disclose information if needed to detect and prevent fraud or in connection with a legal process, for example to enforce our agreements or to protect our rights, you or others.

5 WHERE WE **PROCESS** YOUR PERSONAL DATA

Insert Coin always strives to process and store your data within the EU/EEA. However, your data may in certain situations be transferred to, and stored at, a destination outside of the EU/EEA territory.

Please note that privacy laws in countries outside of the EU/EEA may not be the same as, and in some cases may be less protective than, privacy laws in your country. However, we always select our service providers carefully and take all the necessary steps to ensure that your personal data is processed with adequate safeguards in place in accordance with the General Data Protection Regulation 2016/679 (GDPR). These safeguards are either that we sign the EU Commission Standard Contractual Clauses or ensure that the service provider is established in a country which the EU Commission has deemed as having adequate privacy protection or, if the company is established in the United States, certified under Privacy Shield.

Please contact us for more information about the applicable safeguard in a specific case.

6 HOW LONG WE KEEP YOUR **PERSONAL DATA**

Insert Coin keeps your personal data only for as long as necessary to fulfil the purposes for which it was collected. How long depends on the type of information and why we process it. We regularly review our need to keep data, taking into account applicable legislation.

If you or the company you represent use the Service, we generally save your personal data for as long as you subscribe the Service and as needed for tax and book-keeping purposes etc.

Personal data processed on the basis of your consent will be deleted when your consent is withdrawn or upon expiry of the purpose for which your consent was given.

Moreover, we store data to the extent we believe it is necessary to protect our legal rights, legitimate interests and the interests of others. Your data may also be stored for a longer period if required by applicable statutory retention periods.

7 CHILDREN'S PRIVACY

Insert Coin does not knowingly collect any personal data from any individual under the age of 13 or knowingly allows such individuals to register for the Service. The Service and its content are not directed at children under the age of 13. If we become aware that Insert Coin has collected personal data from a child under the age of 13 without parental consent, we will delete that personal data as quickly as possible. If you believe that we may have collected any personal data from or relating to a child under the age of 13, please contact us.

8 YOUR RIGHTS

- **Right to object.** You have right to object to processing based on legitimate interest. This means that we may no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests. You can always contact us for more information on the balance test that has been made.

You may also object to your personal data being processed for direct marketing purposes.

- **Right to access your data.** You have the right to request a transcript of personal data processed by us, and additional information on how the data have been collected, processed, shared, etc. The first transcript may be requested free of charge, however if you make repeated and unreasonable requests for copies we might charge you with an administrative fee.
- **Right to transfer your data.** You have the right to transfer your personal data to another controller under certain conditions.
- **Right to rectification.** You have the right to correct inaccurate or incomplete information about yourself.
- **Right to erasure ('right to be forgotten').** You have the right to request that we delete personal data about you, for example if the data is no longer necessary in relation to the purposes for which it was collected or otherwise processed, or if there is no legal basis for processing the data.

- **Right to restriction.** You are entitled to request that the processing of your personal data should be limited until inaccurate or incomplete information about you has been corrected, or until an objection from you have been handled.
- **Right to withdraw your consent.** You may at any time withdraw any consent you have given us. However, please note that it will not affect any processing that has already taken place.
- **Right to complain.** You have the right to lodge a complaint to the Supervisory Authority in the country you live or work in, if you believe that we have not complied with our obligations regarding your personal data.

In Sweden the Supervisory Authority is *Datainspektionen*, which also is our lead supervisory authority, and you can find more information at their website: <https://www.datainspektionen.se/>.

Please note that if you request restriction or erasure it might affect our abilities to provide our services to you. Moreover, legal rights or obligations (such as confidentiality, accounting and tax legislation) may prevent us from disclosing or transfer all or part of your information, or from immediately deleting your information.

9 CHANGES IN THIS PRIVACY POLICY

This privacy policy may be updated periodically to reflect changes in our collection and use of your personal data. You will be informed of any significant changes (e.g. by e-mail), but we also recommend that you review this privacy policy from time to time to ensure you are aware of any amendments.