#### Baetes Technologies AB Privacy Policy

# **Privacy Policy**

Protecting your privacy is important to us here at Baetes Technologies AB, a company registered at Box 92138, 120 08 Stockholm, Sweden, with the Swedish company organizational number (Org. nr 559075-6483). This Privacy Policy ("Policy") explains how Baetes ("Baetes", "us" or "we") processes your personal data when you decide to register to our platform and use our services. Personal data means any information relating to an identified or identifiable natural person. This information can be e.g. your name or contact information, which we need to process in order to offer you our services.

#### Controller of your personal data

The controller of your personal data is:

Baetes Technologies AB, Box 92138, 120 08 Stockholm, Sweden.

If you have any questions regarding the processing of your personal data or you wish to have your privacy rights explained, please do not hesitate to contact us at <u>privacy@baetes.com</u>.

# What types of personal data do we process about you?

The personal data we process relates to customer management. We process the contact details, customer details, potential login details, and payment information, which you have provided to us when registering to our platform or by using our services. This information includes your name, email address and payment details.

The provision of said personal data is necessary in order for us to be able to provide you the service. If you choose not to provide this data to us, we cannot offer you the service you wish to use.

### Why do we process your personal data?

We process your contact details in order to set up an account to you following your request. The legal basis for processing this data is that the processing is necessary in order to take steps at your request prior to entering into a contract and for the performance of that contract.

We may also process your contact details in order to send you marketing communications related to your use of the service. The legal basis for processing is our legitimate interest to send you marketing communications. You have the right to object the processing of your personal data for this purpose at any time by using the contact details set out above.

The payment information is processed because it is necessary for the performance of the contract between us and in order for us to be able to offer our services to you.

# How long do we retain your personal data?

We do not retain personal data longer than is necessary in order for us to offer you the services you have requested. In general, we delete all personal data relating to you once you decide to close your account and no longer use our services. However, we might have to retain certain information of the payments made by you in order to comply with the requirements set forth by local accounting legislation.

#### **Disclosing your personal data**

We may disclose your personal data to other companies that belong in the same group as Baetes Technologies AB or to third parties that assist us in providing services to you. These companies are located within the European Union/European Economic Area and therefore they will process your personal data with the same level of protection and care as we do.

We may also transfer your personal data outside the European Union/European Economic Area, mainly to the United States since our main server is located in the United States. We transfer your personal data in compliance with applicable data protection laws and by using appropriate safeguards, such as entering into standard data protection clauses with the recipient or transferring data under the EU-U.S. Privacy Shield Framework.

If you want to receive more information about the transfers of your personal data and the recipients thereof, please do not hesitate to contact us at the email address set out above.

# Your rights

If you are located in an EU member state, the European Union General Data Protection Regulation 2016/679 (the "GDPR") provides you with rights with regard to your personal data. You have the following rights under the GDPR:

- Right of access to your personal data. You have the right to obtain confirmation from us as to whether your personal data is processed as well as to receive certain information of the processing.
- Right to rectification. You have the right to obtain rectification of inaccurate or incomplete personal data.
- Right to be forgotten. You have a right to obtain the erasure of personal data and the data will be erased unless we have a legal basis to process said data.
- Right to data portability. You have the right to receive the personal data you have provided in a structured, commonly used and machine-readable format if the processing is based on a contract between us or your consent and the processing is carried out by automated means.
- Right to object. If we process your personal data on the basis of our legitimate interest, you have a right to object the processing on grounds related to your particular situation.
- Right to restriction of processing. In certain situations you have the right to restriction of the processing of your personal data after which we will process your personal data mainly only for retention purposes.

In addition to the above-mentioned rights, you also have a right to lodge a complaint to the supervisory authority if you feel that our processing of your personal data is not conducted in

accordance with the applicable privacy legislation. You can find a list of the European supervisory authorities here: https://ec.europa.eu/newsroom/article29/items/612080

If you wish to use your rights, please do not hesitate to contact us at the email address set out above.

# Updates

We may update this Privacy Policy from time to time and we encourage you to review it regularly. The latest version of this Privacy Policy is available by contacting us at privacy@baetes.com.

This Privacy Policy was last updated on October 4th 2023.