

# Privacy and Data Protection Policy

## The security of your personal data is important to us

Your personal data is the data we collect and save about you and how you use our services which identifies you directly or indirectly. We use this information in order to provide you with better user experiences, improve our services, and supply offers that fit your needs.

Here below we will explain just how we at Epass24 (ParkTrade Europe AB, organisation nr. 556673-0551) collect and handle your personal data, and explain what rights you have in accordance with the General Data Protection Regulation (GDPR).

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### 1. What kinds of personal data do we collect?

When you become an Epass24 customer we collect your contact information, which includes your: name, address, e-mail, telephone number, vehicle details such as model and license plate number, and card payment details via external card payment provider which is PCI compliant.

We also collect data about which of our services you order and use, and how you use them. Exactly what kinds of information we collect about you depends on which of our services you use.

When you contact our customer support, we collect the case-specific information you provide us with in order to assist you properly.

### 2. How do we collect personal data?

We collect and process your personal data in a variety of ways. Data is collected when:

- You enter it yourself when signing up to become a customer.
- You share it with us when contacting us via chat conversations, emails, and recorded phone calls.
- You use our services—for example, when you visit our website or log in to your account.
- We receive it from other sources, such as various national vehicle registries.
- It's collected through cookies, which store information from your browser.

### 3. What do we use personal data for?

In order to provide you with our services, we need to process your personal data. Below you will find information about what we use your data for, and the legal basis that supports each data processing.

#### Data Processing Legal Bases

In order to process your data, one of the following legal bases must be met:

- Processing your data is necessary in order to fulfill the contract with you.
- Processing your data is necessary in order to fulfill a legal obligation for Epass24.
- Processing your data lies in the common interest of both you and Epass24.
- Your consent has been received for a particular instance of data processing.

#### What your data is used for

##### a. Provision of services

We process your personal data in order to identify you as a customer and manage and deliver the services you have ordered and subscribed to. We also process the personal data which is required to handle notifications and payments of the services we are appointed to carry out on behalf of our organizational clients such as, but not limited to, the Swedish Transport Agency (Transportstyrelsen).

Legal basis: Necessary to fulfill contract.

##### b. Communication and support

In order to provide you with optimal assistance, we may use personal information obtained from previous communication that has occurred between you and us.

We use your contact information and information about which services you use as the basis for invoices, newsletters, providing you with important information about your services, and informing you about special offers and tips on how to best use our services.

Legal basis: Legitimate interest, consent and necessary to fulfill contract.

##### c. Development of our services and products

We process personal data on how you use our services and from your communication with us in order to improve your specific user experience and our services in general.

Legal basis: Legitimate interest and consent.

##### d. Marketing

We process personal data about what services you use and how you use them in order to market products and services to you which are relevant to your needs.

Legal basis: Legitimate interest and consent.

##### e. Security and prevention of abuse

We process personal data in order to detect and prevent the following from affecting our services and network:

- Abuse
- Intrusion attempts

- Attacks, such as viruses and DDOS
- Law violations
- Terms violations

Legal basis: Necessary to fulfill contract and legal obligation.

#### f. Regulatory obligations

We process personal data in order to comply with the requirements of the law.

Legal basis: Legal obligation.

## 4. How long do we store your personal data?

We store personal data as long as there exists a legal contracted obligation for its processing. For details, please contact our customer support by sending an email to [gdpr@epass24.com](mailto:gdpr@epass24.com).

## 5. Who do we share your personal data with?

### Partners and subcontractors

We never share more personal data than absolutely necessary with each partner. Appropriate safeguards are implemented to ensure that your personal data is handled in accordance with applicable laws regarding safety and privacy—and the same requirements are applied to our subcontractors.

We have agreements with all of our partners and subcontractors with whom we share personal data. The agreements regulate what personal data is to be processed, why the processing is done, how personal data is to be protected, and for how long it is to be processed. The agreements also contain instructions from the data controller to the data processor, detailing how personal data may be processed.

### Authorities

We may be required to provide certain personal data by law, and according to authority decisions and requests from, for example, the police.

## 6. How do we protect your personal data?

We have taken systematic, organizational and technical measures to ensure the integrity, confidentiality and accessibility of your personal data.

We use industry standards to store, process, and communicate sensitive personal information such as personal data and passwords in a safe way. For example, SSL/TLS, PGP, and one-way hash algorithms.

Our Epass24 staff members are bound by confidentiality agreements and only process the data which their specific tasks require.

We have implemented security practices regarding:

- information security
- incident management
- risk analysis
- software updates
- secure configuration and management of devices
- office and data centers
- software development
- education and training

## 7. Who controls your personal data? (You do!)

You control your own personal information. This means that you decide which data you want to provide us with and what kinds of processing of your personal data you approve. You have the right to revoke your consent at any time.

However, we do need access to some of your personal data in order to provide our services to both you and our clients. If you choose to revoke your consent, it may affect our ability to provide you with all of our services.

## 8. What happens with your personal data when you are no longer a customer?

When you terminate your account with us, we will remove all of your personal data where there is no purpose for its further processing. We will also notify any potential partners and subcontractors who have processed your data and tell them to also delete the data.

The types of personal data removed includes the following:

- Email addresses with associated emails.
- Personal data in our CRM system.
- Backups of the above, in accordance with our backup schedule.

Included among the data not removed are data required by the Accounting Act.

## 9. Your rights as a user of Epass24's services

You are entitled to receive information from us about the processing of your personal data and the purpose of its processing while it is in our care.

The following information summarizes how we fulfill your personal data rights in accordance with the General Data Protection Regulation (GDPR).

### a. Right to information

You have the right to request an excerpt of your personal data at any time, where you specify what information you wish to receive.

### b. Right to rectification

If you should find that the personal information being stored about you is incorrect or missing, you are entitled to request that we adjust or complete that information. Once the adjustment is complete, we will notify any partners and subcontractors who are also affected by the adjustment.

### c. Right to deletion ("the right to be forgotten")

You as a customer have the right to have your personal information deleted if:

- The data are no longer needed for the purposes for which they were collected.
- You revoke your consent for data that has no other legal basis.
- The data processing purpose is direct marketing and you oppose the processing.
- You oppose legitimate interest as a legal basis, and there is no other legal basis that is stronger.
- The personal data have not been processed according to GDPR.
- Deletion is required to fulfill a legal obligation.

The exception is personal data required by law, such as invoice information, which is saved as long as required by the Accounting Act, as well as data processed in order to meet legal obligations we may have towards our clients.

Once the requested deletion is complete, we will also notify any partners and subcontractors who are affected by the adjustment.

#### d. Right to restriction (from 2018-05-25)

In some cases, you may request that the processing of your personal data be restricted—entailing that the data is labeled in such a way that only allows processing for certain limited purposes in the future.

- If you have requested that your data at Epass24 be corrected or completed, you also have the right to request that processing be restricted while the adjustment is being made.
- When you have objected to processing while waiting for verification regarding whether Epass24's legal reasons are stronger than your justified reasons.

Once a restriction expires, you will be informed accordingly.

#### e. Right to data portability (from 2018-05-25)

In some cases, you may have the right to obtain and use your personal data elsewhere. In those cases, Epass24 is obligated to facilitate the transfer of your data.

This applies when:

- You have shared the data with Epass24 yourself.
- You have submitted your consent for data processing.
- Data processing is required in order to provide the services you ordered from us.

The right to data portability does not apply when we are processing your data because of legitimate interest or due to legal obligation.

#### f. Right to object

You have the right to object to the processing of your personal data if the processing is being conducted...

- In order to perform a task of public interest.
- As part of an authority exercise.
- Because of legitimate interest.

If we at Epass24 oppose your objection, we must be able to provide reasons that are stronger than your personal interests.

When it comes to processing your personal data for marketing purposes, you are always entitled to object to the processing at any time.

#### g. Automated decision making

You are entitled to choose not to be the subject of a decision which is based solely on any form of automated decision making, including profiling, in cases where the decision may have legal consequences for you or affect you in a similarly significant way.

#### h. Complaints

If you believe that we are processing data about you in violation of GDPR, you should notify us as soon as possible by sending an email to [support@epass24.com](mailto:support@epass24.com). Complaints can also be filed with the Swedish Data Protection Authority.

#### i. Request indemnity

If you have suffered damage due to the processing of your personal data in violation of GDPR, you may be entitled to indemnity. You can file a claim for indemnity by sending an email to [gdp@epass24.com](mailto:gdp@epass24.com) or through prosecution in court.

#### j. Cookies and how we use them

Epas24's websites use cookies, which are small text files stored on your computer.

We use two types of cookies. Session cookies are cookies that are only saved temporarily during your site visit; for example, to keep track of whether or not you are logged in. Persistent cookies are cookies stored in a file on your computer for a limited time. They are used to improve your experience as a recurring visitor of our websites. Some persistent cookies are so-called third-party cookies from tools we use for analytical purposes in order to improve our services and experience, as well as certain types of marketing.

#### k. Deny cookies

If you wish to deny or delete previously stored cookies, you can do so via your browser settings.

Epas24.com will continue to work as expected if you deny persistent cookies and third-party cookies. However, if you deny session cookies we cannot guarantee that the site will function as promised—this may affect, for example, your ability to remain logged in.

#### l. More information about cookies

You can learn more about cookies from The Swedish Post and Telecom Authority.