PROACT

## PRIVACY NOTICE

Proact respects your privacy and is committed to protecting your personal data. This privacy notice tells you how we look after your personal data, including when you visit our website (regardless of where you visit it from) and tells you about your privacy rights and how the law protects you. We will update this privacy notice from time to time as we undertake new personal data practices or adopt new privacy policies.

## INTRODUCTION

- This website is operated by Proact IT Group AB, reg. no. 556494-3446, a company incorporated under Swedish law with principal address in Stockholm, Sweden.
- Through this website you may learn about our products and services, register to participate in events, access or subscribe for reference materials, or interact with tools or applications provided by us.
- You will be able to access most parts of the website without registering your personal data with Proact. We do however, use cookies and similar technologies which provides us with personal data about you. You can read more about our cookies and your choices in our cookie policy.
- Certain sections of the website require that you provide us with some more information. These sections may ask you to provide information such as, but not limited to, your name, email and address.
- For specific services such as those managed by our affiliates, specific terms and/or privacy policies apply.
- We are part of an international group of companies and share administrative resources and systems. We may therefore share some or all of your personal data with affiliates for our administrative purposes, or for our legitimate purposes described in this privacy policy.
- Proact has appointed a data protection officer for you to contact if you have any questions or concerns about our personal data policies or practices at: dpo@proact.eu.
- By using this website, you agree to the terms contained in this privacy notice. If you do not agree to any of these terms, you should not use this website. You agree that any dispute over privacy or the terms contained in this privacy notice will be governed by the laws of Sweden.

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# 1. IMPORTANT INFORMATION AND WHO WE ARE

**PURPOSE OF THIS PRIVACY NOTICE**

This privacy notice gives you information about how Proact collects and processes your personal data including through your use of our website, and including any data you may provide to us when accessing or subscribing for reference material, newsletters, purchasing products or services, participating in events, or interacting with tools or applications provided by us.

Our website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements such other notices and is not intended to override them.

**CONTACT DETAILS**

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact our Data Protection Officer (Annabella Schwiertz) at: dpo@proact.eu.

You have the legal right to make a complaint at any time to the supervisory authority in your jurisdiction for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the supervisory authority so please contact us in the first instance – should this not be possible, you can find details of the relevant supervisory authorities here.

**DATA CONTROLLER**

Proact is made up of different legal entities, details of which can be found here. This privacy notice is issued on behalf of the Proact corporate group so when we mention ”Proact”, “we”, “us” or “our” in this privacy notice, we are referring to the relevant company in the Proact corporate group responsible for processing your data. The relevant company is the company which provided you with the link to this privacy notice.

**APPOINTED REPRESENTATIVES**

Where a Proact entity based within the UK is processing personal data in the UK of data subjects who are located in the EU or EEA then to the extent legally required the appointed EU representative is Proact IT Group AB.

Where a Proact entity based outside the UK is processing personal data outside the UK of data subjects who are located in the UK then to the extent legally required the appointed UK representative is Proact IT UK Limited.

You may contact either of our representatives at: dpo@proact.eu

**THIRD-PARTY LINKS**

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

# 2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information relating to an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may use any

information you provide to us as set out in this privacy notice.

We may also collect personal data about you from third parties including publicly available information sources (including social media and websites), third party marketing agencies, vendors and our customers or suppliers which may also be used by us as set out in this privacy notice.

The personal data may include identity data, contact information, images or videos, financial details, details of your transactions with Proact or related parties, technical data deriving from your use of our website or products and services, profile and usage data from our services which you access, and marketing and communications interests and preferences.

We may also collect, use and share aggregated data such as statistical or demographic data for our internal purposes. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

**IF YOU FAIL TO PROVIDE PERSONAL DATA**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you or your organisation (if this is our customer) has with us; but we will notify you if this is the case at the time.

# 3. HOW WE COLLECT YOUR PERSONAL DATA

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data collected when you:
    - apply for our products or services;
    - enter into discussions to provide us with your products or services;
    - use or interact with the services on our website;
    - subscribe to our service or publications;
    - request marketing to be sent to you;
    - participate in or attend our events;
    - respond to job advertisements;
    - enter a competition, promotion or survey; or
    - give us some feedback.
- Automated technologies or interactions. As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy for further details.
- Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources based inside or outside the EU and the UK as set out below:
    - technical data including standard internet log information and details of visitor behaviour patterns from the following parties:

        - analytics providers such as Google;
        - advertising networks; and
        - search information providers.
    - contact, financial and transaction data from providers of technical, payment, credit reference and delivery services.
    - identity and contact data from data brokers or aggregators.
    - identity and contact data from publicly availably sources.

# 4. HOW WE USE YOUR PERSONAL DATA

**PROCESSING PURPOSES**

We have set out below, a description of all the ways we may use your personal data, and the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

- To register you or your organisation as a new customer or supplier;
- Where the processing enables us to enhance, modify, personalise or otherwise improve our services/communications for the benefit of our customers or suppliers;
- To use data analytics to improve our website, products/services, marketing, customer or supplier relationships and experiences;
- To identify and prevent fraud;
- To improve customer service;
- To deliver goods or services to you or your organisation;
- To process invoices for goods or services delivered by you or your organisation to us or our customers;
- To personalise user experience;
- To enhance the security of our network and information systems;
- To better understand how people interact with our websites;
- To communicate with you, including:
    - by telephone with communications we think may be of interest to you;
    - postal communications which we think will be of interest to you;
    - periodic emails containing information that will be of interest to you;
    - responding to a request or to provide you with support;
    - responding to you when you submit a job application to us;
- To determine the effectiveness of promotional campaigns and advertising;
- To provide to our suppliers, vendors and/or subcontractors, event exhibitors, in order to deliver our products and services or for you to be invited to participate in events which we think will be of interest to you. As part of our event registration process, we process your personal data, which may include creating an event visitor badge. During events, exhibitors might request to scan a QR-Code on your

visitor badge. The exhibitors are responsible for this data processing including confirming how they will use your personal data; and

- To manage our relationship with you which may include asking you to leave a review or take a survey.

**LEGAL BASES**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

We may also rely on your specific consent as a legal basis for processing your personal data for example in relation to sending third party direct marketing communications to you via email or text message.

**OUR LEGITIMATE INTERESTS**

- to recover debts due to us;
- to keep our records updated;
- to manage supplier relationships;
- to study how customers use our products/services;
- to develop our products/services;
- to grow our business including by way of direct marketing;
- for running our business, provision of administration and IT services;
- for network security;
- to prevent fraud;
- in the context of a business reorganisation or group restructuring exercise;
- to inform our marketing strategy;
- to define types of customers for our products and services; and
- to track the number of visitors to the various parts of our websites in order to keep them updated and relevant.

The majority of the personal data we use for our legitimate interests as described above is not sensitive. Our use of your data as set out in this notice is important for Proact in order to function as an efficient organisation.

It is necessary for Proact to collect and process certain information, limited to a minimum and subject to additional safeguards, to be able to, for example, provide transactions requested by our customers, administer our shared systems in the Proact group of companies, to understand our customers and website visitors, and fulfil our obligations towards our customers and other third parties.

**MARKETING / OPTING OUT**

If you no longer want to receive marketing communications from us, you can tell us by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, please note that if you ask us not to contact you by email at a certain email address, we will retain a copy of that email address in order to comply with your no-contact request.

**COOKIES**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy.

**CHANGE OF PURPOSE**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for an additional purpose which is compatible with the original purpose.

If we were to consider using your personal information for a new purpose, we will inform you or, as required, ask for your permission or collect your consent.

# 5. DISCLOSURES AND TRANSFERS TO THIRD PARTIES

We share your personal data within the Proact corporate group and with our subprocessors and service providers that facilitate our delivery of services to our customers (such as hosting partners, service desk etc.). This may involve processing your data outside the European Union, the European Economic Area and the United Kingdom. A list of our current third-party processors is available from www.proact.eu/privacy

Some of our third-party processors are based outside of the EU, EEA, and the UK so their processing of your personal data will involve a transfer of data outside of these areas. Whenever we transfer your personal data from within the EEA to a jurisdiction or territory outside of the EEA, or from within the UK to a jurisdiction or territory outside of the UK, we will ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Where such transfer is as a result of Proact personnel requiring access to your personal data this will be for the same legitimate business purpose(s) set out in this notice, and we will ensure that appropriate technical measures are in place to safeguard such access.
- Where such transfer is to a third-party processor we will comply with applicable data protection legislation in particular but not limited to ensuring that any such transfer is either on the basis of an EU and/or UK adequacy decision or (in the absence of an adequacy decision) standard data protection clauses (for example the EU Standard Contractual Clauses as approved by the European Commission) which contains requirements to implement controls that provide the same level of protection for personal data as it has in the EU/EEA, together with any additional measures as may be required.

We require all third parties to respect the security of your personal data, to treat it in accordance with the law and only permit them to process your personal data for specified purposes in accordance with our instructions.

**COMPELLED DISCLOSURES**

We may also share your personal data when we are required by law, competent law enforcement, regulator, government authority, court or third parties: (i) as may be permitted or required by applicable law or regulation; (ii) in order to exercise, establish or defend our legal rights; or (iii) to protect your vital interests or those of any other person;

We may share personal data with a potential buyer (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice.

## 6. DATA SECURITY

Personal data managed by Proact is stored and processed according to applicable data protection legislation. We take steps to ensure that the information we process is dealt with in accordance with this privacy notice and in accordance with applicable laws.

When required or appropriate and feasible, we shall obtain written assurances from third parties that may access your data that they will protect the data with equivalent safeguards to those adopted by Proact.

To protect the privacy of your information we maintain both technical and organisational safeguards, and we regularly update and test our security measures. However, please note that no information system is completely secure and we cannot guarantee the absolute security of your information. We are not responsible for the security of information you transmit to us over networks that we do not control, including the Internet.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who need access in order to fulfil any of the purposes described in this privacy notice. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 7. DATA RETENTION

**HOW LONG WE WILL USE PERSONAL DATA FOR**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policies which you can request from us by contacting us at dpo@proact.eu**.**

## 8. YOUR LEGAL RIGHTS

You have a legal right to: request access to and/or rectification or erasure of your personal data; restrict our processing of your personal data; object to our processing of your personal data; the right to data portability; as well as to withdraw any consent you have given.

You can make requests regarding your personal data by contacting our Data Protection Officer at dpo@proact.eu.

**NO FEE USUALLY REQUIRED**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

**WHAT WE MAY NEED FROM YOU**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**TIME LIMIT TO RESPOND**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 9. CHANGES AND UPDATES TO THIS PRIVACY NOTICE

As our practices and policies change, so will this privacy notice. We reserve the right to change and update this privacy notice at any time, for any reason, without notice to you, other than updating the privacy notice on our website. We recommend that you regularly check this page to keep yourself updated on our privacy practices. Previous versions of this privacy notice are available here.