PRIVACY POLICY

DSTNY, UPDATED MAY 2022

1.Introduction

According to the General Data Protection Regulation (EU) 2016/679 (GDPR), a company is the controller of personal data when the company determines the purpose for which and the means by which personal data is processed. It is Destiny Sweden AB's, org.nr 556377-2317 ("**Dstny**") responsibility to ensure that all personal data which is handled in our operations is processed correctly and in accordance with applicable data protection legislation.

This Privacy Policy (hereinafter the "**Privacy Policy**") describes Dstny's processing of your personal data and has the purpose of making you feel safe knowing how Dstny process your personal data.

Personal Data means all types of information which can, directly or indirectly, be attributed to a living natural person. Within Dstny's business activities, Personal Data such as given names and surnames, social security numbers, telephone numbers, address, postal codes, e-mail addresses etc. may be processed. ("**Personal Data**").
If you cannot find answers to your questions, please get in touch with us. You will find information about how to contact us under the heading "Contact Information" at the bottom of this policy.

Dstny's Responsibility as Data Processor
Dstny provides the services to the Customer, where Dstny acts as data processor and the Customer as Data Controller. A Personal Data Processing Agreement is signed between the Customer and Dstny to ensure secure, correct and legal processing of Personal Data in each individual case. The Customer is the controller of Personal Data for the end user that are processed within the service and Dstny only process such data in accordance with instructions from the Customer. Dstny's processing of Personal Data on behalf of the Customer is not subject to this Privacy Policy.

Dstny's Responsibility as Data Controller
Dstny processes Personal Data in capacity as Data Controller in accordance with the information below

2. Processing of Personal Data

2.1. Customers

For reference
Customer Data:
• Name of contact persons for billing reference
• Email address to contact persons & phone number
• On specified invoices (upon request from customer): name, employees phone number and data usage

Traffic Data:
• On specified invoices
  o name,
  o employees
  o phone number
  o aggregated data usage
  o aggregated sms usage
  o aggregated phone calls per destination
• In self-service portal
  o specification on aggregated information
• Incoming calls to answering services and call recording services
  o calling and responding identity
  o statistics related to response service including in-calling numbers

Recorded Media

•(Upon request from customer) recorded real time communication

Purpose and type of processing	Categories of data subjects	Categories of personal data	Legal basis for processing	Retention period
We collect contact information about our Customers for billing purposes and charging for our services by managing invoices, payments and conduct credit disclosures.	Customers	"**Customer Data**" • Name of contact persons for billing reference • Email address to contact persons & phone number • On specified invoices (upon request from customer): name, employees phone number and data usage "**Traffic Data**" • On specified invoices o name, o employees o phone number o aggregated data usage o aggregated sms usage o aggregated phone calls per destination • In self-service portal o Specification on aggregated information • Incoming calls to answering services and call recording services o Calling and responding identity o Statistics related to response service including in-calling numbers "**Recorded Media**" • (Upon request from customer) recorded real time communication	• Legitimate interest to secure correct invoicing • To enable specified invoices for the customers	• As long as you are a customer and for 24 months after you have ended your contractual relationship with Dstny. • Recorded media is held as long as agreed with customer
Purpose and type of processing	**Categories of data subjects**	**Categories of personal data**	**Legal basis for processing**	**Retention period**

Purpose and type of processing	Categories of data subjects	Categories of personal data	Legal basis for processing	Retention period
We process personal data about our Customers for accounting purposes.	Customers	•Customer Data •Traffic Data	Legal obligation	• We retain Traffic Data for billing purposes which under law must be kept for a period of 5/7 years in accordance with the Swedish Book-keeping Act.
We collect personal data when we communicate with you to provide service information and updates. When you call our customer service, the call can be recorded. When you chat with our customer service, the written texts can be analysed. We do this to educate our employees, improve our speeches and our way of working in order to always help you in the best possible way.	Customers	• Customer Data * Traffic Data	• Legitimate interest (Customer Data)	• Customer Data: As long as you are a customer at Dstny and for 24 months after you have you have ended your contractual relationship with us. Traffic Data: We save Traffic Data to help you if you experience issues with the services we deliver. This data is saved for 6-24 months.
We process personal data to evaluate, develop and manage our operations and services as well as our processes. For this purpose, we may also compile statistics for analytical needs.	Customers	• Customer Data * Traffic Data	• Legitimate interest (Customer Data) (Traffic Data)	• Customer Data: As long as you are a customer at Dstny and for 24 months after you have you have ended your contractual relationship with Dstny. Traffic Data: In order for us to continuously offer better services, we also save statistics based on this information. This data is saved for 6-24 months.

Purpose and type of processing	Categories of data subjects	Categories of personal data	Legal basis for processing	Retention period
We process personal data to evaluate, develop and manage our operations and services as well as our processes. For this purpose, we may also compile statistics for analytical needs.	• Customers Leads	• Customer Data * Traffic Data	• Legitimate interest (Customer Data) (Traffic Data)	• Customer Data: As long as you are a customer at Dstny and for 24 months after you have you have ended your contractual relationship with Dstny. Traffic Data: In order to offer you attractive market deals based on your needs, we save certain data, such as number of texts and phone calls, as well as information about your data usage. We save the information for 24 months.

Purpose and type of processing	Categories of data subjects	Categories of personal data	Legal basis for processing	Retention period
We process data in order to fulfil our statutory obligations as a telecom service provider/ operator.	Customers	• Customer Data * Traffic Data	Legal obligation	• Customer Data: As long as you are a customer at Dstny and for 24 months after you have you have ended your contractual relationship with Dstny. Traffic Data: In order to comply with statutory obligation we may process you Traffic data for 24 months after you have ended your contractual relationship with Dstny.

Purpose and type of processing	Categories of data subjects	Categories of personal data	Legal basis for processing	Retention period
To ensure data security and to avoid misuse of the Service. We process data in order to meet the security of all our services and communications networks, to detect or prevent various types of illegal use or use that otherwise violate the terms of service. We also treat these data to prevent network and service abuse, and to detect and prevent fraud, virus attacks, etc.	Customers	• Customer Data * Traffic Data	Legitimate interest	• Customer Data: As long as you are a customer at Dstny and for 24 months after you have you have ended your contractual relationship with Dstny. Traffic Data: In order to comply with statutory obligation we may process you Traffic Data for 24 months after you have ended your contractual relationship with Dstny.

2.2. Recruitment

Purpose and type of processing	Categories of data subjects	Categories of personal data	Legal basis for processing	Retention period
We process personal data to administer the recruitment process with potential employees. This includes, for example, to review the application and communicate with the applicant.	Applicants	• Name • Address • Email address • Phone number • Social security number • Photograph	Legitimate interest: to be able to conduct recruitment processes and to defend us against legal claims after the recruitment process has ended.	• Up to two years after the position has been filled. After the recruitment process the data will be filed in order for us to defend our rights in any legal dispute concerning discrimination.

2.3.   Automated decision process

We do not perform any data processing activities that result in automated decision-making.

2.4. How we use Cookies

Dstny is the Data Controller for the processing of your Personal Data collected through cookies when you visit our website (http://www.dstny.se). We process the information that is created by the cookies that are set when you visit our website (including your IP address), such as the length of your visit, the number of page views, the choices you make on our website and how you found our website.

Your Personal Data is processed for the purpose of our visitors being able to use the site in our intended way and for statistics. Such Personal Data is processed based on a balance of interests between your and our legitimate interests. Our legitimate interests in processing your Personal Data are to give you a desirable user experience of our website and our commercial interest in obtaining information.

The retention period for such Personal Data will vary depending on which cookie is added to your browser. Permanent cookies remain on your computer until you delete them or expire due and you will return to our website. Session cookies does not have any expiration date and are stored temporarily in your computer while you are on our website. When you close your browser, any session cookies disappear. Third party cookies are cookies coming from a third party and used on our website to, for example, get statistics that can help us simplify and customize our website.

You can choose whether you want to accept or block cookies. Most browsers automatically accept cookies, but you can change browser settings to block cookies. Below you will find examples of how to do for each web browser.

- Google Chrome
- Safari
- Mozilla Firefox
- Internet Explorer

Please note that if you choose to block cookies, this may in some cases impair the functionality and experience of our website/web application.

2.5. Recipients of Personal Data and transfers to third countries outside the EU/EEC

In our capacity as Data Controller, we may assign the processing described above to a partner or supplier. Such processing will not be made for other purposes than as described above. Some partners and suppliers have parts of their businesses in countries outside the EU/EEC (so-called Third Countries). Transfer is only made to such countries that offer an adequate level of data protection according to the EU Commission, or if the supplier has a legally binding and enforceable instrument that guarantees the safety of the Personal Data.

Personal Data will be shared with the following third parties:

Third Party	Purpose	Data that is shared	For more information about third party data processing
Piwik PRO SA	To generate statistics on how our website is used.	IP address. Web-browser type. Third-party cookies.	Piwik Terms of Service Piwik Privacy Policy

Hotjar	To see how website visitors interacts with our website and to collect feedback in order to improve our website's user experience.	HTML changes that happen while you use our webpage. Mouse movements. Mouse clicks. Scroll movements. Keystrokes only for whitelisted input fields. Browser viewport size changes.	Hotjar Terms of Service Hotjar Privacy Policy
Olark	To offer you our products and services when we have identified mutual interest or needs.	Name. Phone number. Address. E-mail.	Olark Terms of Service Olark Privacy Policy
Upsales	To analyse website visitor behaviour, contact potential customers though customized advertising and to show our ads on external websites.	Third-party cookies.	Upsales Privacy Policy
Facebook	To analyse website visitor behaviour, contact potential customers though customized advertising and to show our ads on external websites.	Third-party cookies.	Facebook Privacy Policy

2.6. Your rights as Data Subject

You have the right to:
- request information on what type of Personal Data we process and you may request a copy thereof (record extract);
- have incorrect Personal Data rectified and, in certain cases, request to have your Personal Data deleted;
- object against the processing of certain Personal Data and request that the processing of your Personal Data is restricted;
- withdraw your consent to Personal Data processing;
- have the Personal Data you've provided us transferred to another Data Controller (right to data portability)

Please notice that if we restrict the processing of or erase your Personal Data we might not be able to provide the Service to you.

In order to withdraw your consent or exercise any other of your rights as a data subject, you are welcome to contact our Data Protection Officer at **dpo@dstny.se**

If you are unhappy with how we process your Personal Data, you may also file a complaint with the Swedish Authority for Privacy Protection by **visiting www.imy.se**

2.7. Protection of the Personal Data

Dstny has undertaken appropriate technical and organisational measures in order to protect Personal Data against loss, abuse, unauthorized access, disclosure, alteration and destruction. In order to ensure that the Personal Data is processed in a secure and confidential manner, Dstny uses firewalls and other security measures to protect networks against breach, authentication methods pursuant to industry standards. OWASP 2017 guidelines are followed for http interfaces. In order to secure the integrity of the Personal Data Dstny use encryption techniques when Dstny transfers such Personal Data to Dstny´s servers.

Company employees and suppliers are bound by confidentiality agreements and are obligated to follow Dstny's rules for information and IT security and other internal policies that further regulates Personal Data processing.

2.8. Amendments to the Privacy Policy

Dstny reserves the right to amend this Privacy Policy at any time. The date for the latest revision is stated at the end of the Privacy Policy. If Dstny makes any changes to the Privacy Policy Dstny will notify this through our newsletters and notice on this web site. You are therefore recommended to regularly review this Privacy Policy in order to note any changes.

If this Privacy Policy is substantially revised compared to when Dstny obtained your consent, Dstny will notify you regarding these changes and, if necessary, obtain a new consent to Dstny's processing of your Personal Data.

2.9. Contact information

If you have any questions regarding the Privacy Policy or any other question regarding our processing, please feel free to contact us:

Destiny Sweden AB, reg. no. 556377-2317
Att: Data Protection Officer (Dataskyddsombud)
Lumaparksvägen 9
120 31 Stockholm
010-410 50 00
dso@secify.com

This Privacy Policy was last updated on 2022-05