



POINTSHARP

Privacy notice

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1 Personal data processing

Here, information is given about the processing of personal data to the individual who is considered as Data subject.

The General Data Protection Regulation (GDPR) aims to strengthen your rights as a Data subject and protect your personal privacy for each personal data processing.

Pointsharp is committed to protecting your personal data according to GDPR. This privacy notice ("Privacy Notice") informs the Data subject about how Pointsharp's use of personal data, collected by us, including any and all personal data we process.

Personal data is any information relating to an identifiable natural individual (hereinafter referred to as a "**Data subject**" or "**you**"). An identifiable natural individual being a person who can be directly or indirectly identified in particular by reference to an identifier such as name, location data or a several factors specific to the physical, psychological, economic of the natural person.

According to GDPR we as a Data Controller (hereinafter referred to as "Pointsharp", "we", or "our") must be transparent about how we process your personal data. The requirement of transparency means, for instance, that Data subjects have the right to receive information when personal data is processed. This information must contain contact information to the personal data controller, the legal basis for the processing and the purpose of the processing. It must also contain your rights as Data subject.

To ensure compliance with GDPR and to adapt to Pointsharp's values of trust and transparency, we have designed this notice for you as a Data subject. This privacy notice (your right to information) will explain how we collect and process personal data about you as a:

- **Website visitor** – We process personal data about you when you visit our website.
- **Potential customer** – We process personal data about you as contact person or representative of an organization who may be interested in buying products and services of Pointsharp.
- **Customer** – We process personal data about a contact person or representative of a organization that has an ongoing business relationship with Pointsharp.
- **Webinar participant** – When you participate in our webinars, we process your information
- **Premises visitor** – When you are on our premises, there is a possibility that we process your personal data.
- **Exhibition visitor** – We may process your personal data when you visit us at an exhibition.
- **Contractor and subcontractor** – We process personal data about you as a contact person or representative of an organization that has an ongoing contractor and sub-contractors' business relationship with Pointsharp.
- **Partner** – We process personal data about you as a contact person or representative of an organization when Pointsharp and your organization enter a partnership together.

- **Business relationship** – We process personal data about you as a contact person or representative of a organization when Pointsharp and your organization enter a business relationship together.

1.1 Who is responsible for your personal data?

Pointsharp is personal data controller for the processing of personal data within the framework of the business relationship between us and the organization you are the contact person or representative for, alternatives between Pointsharp and you as a private person. The contact person you have within Pointsharp group is therefore the provider of this information.

Who we are:

This privacy notice applies to Pointsharp AB, with headquarters in Stockholm, Sweden.

What we do:

Pointsharp is a European cybersecurity organization that enables organizations to secure personal data, identities, and access in a user-friendly way. We believe security needs to be easy, both for the users, and the IT department. The easy-to-use security solutions lay the foundation for a modern digital workplace.

How to contact us:

Address:	Pointsharp AB Uddvägen 7 131 54 Nacka, Sweden
Email:	info@pointsharp.com
Organization number:	SE556691063301

1.2 Contact our data protection officer (DPO)

If you have any questions about the processing of your personal data or want to get your rights fulfilled, you are welcome to contact us. You can also contact the data protection officer for Pointsharp AB. Contact information is given below.

DPO	IT-Säkerhetsbolaget i Skandinavien AB
Contact	dataskydd@itsakerhetsbolaget.se

1.3 Your rights

As an individual, you have certain rights towards Pointsharp when we process your personal data. Pointsharp strives to ensure that individuals can exercise their rights under the GDPR.

1.3.1 Right to information and access

You have the right to request access to the personal data relating to you. You can get your right met by request us in writing and you will receive information about which personal data we process about you. If you do not have grounds for your request or your request is unreasonable, for example, if you request extracts or deletion often and at short intervals in between, we may either refuse to meet your request, or charge the Data subject for the costs that the request entails for us.

1.3.2 Right to rectification

You have the right, under certain conditions, to have your personal data corrected or supplemented if you find something inaccurate or incomplete. You can get your right met by request us in writing.

1.3.3 Right to erasure

You have the right, under certain conditions, to have your personal data erased. You can get your right met by request us in writing. There are cases when we cannot erase your personal data and it can be e.g if we need it to fulfil a contract with you or if there are laws, regulations or other public demands that states that we are required to keep the personal data. It can e.g. be to meet accounting requirements.

1.3.4 Right to restriction

You have, in certain circumstances, the right to have the processing of your personal data restricted. You can get your right met by request us in writing. In the event of a restriction, the personal data will only be processed for limited purposes and may result in us being unable to fulfil our obligations to you during the verification period.

1.3.5 Right to object

You have the right, based on certain conditions, to object to the processing on following grounds; public interest or balancing of interests, based on point (e) or (f) of Article 6(1). If you don't want us to process your personal data, e.g. direct marketing. You can in writing object at any time by contact us. Henceforth we will stop processing your personal data for this purpose as well as erase the personal data. With exceptions if the personal data have any other purpose that is stated below and have a legal ground to continue processing them.

1.3.6 Right to data portability

You have the right, based on certain conditions, to receive a copy of your personal information which you have provided to us in a structured, generally used and machine-readable format. You also have the right to get your personal data transmitted to another personal data controller if is technically feasible. You can get your right met by request us in writing.

1.3.7 Right to withdraw consent

In cases when the processing is based on your consent, you have the right to withdraw your consent to such processing. You have the right to withdraw at any time. You can get your right met by request us in writing.

1.4 Contact and the right to lodge a complaint

If you are not satisfied with how we process your personal data, then contact us, see our contact information above. You also have the right to submit a complaint to the Swedish supervisory authority ([IMY](#)) or your local data supervisory authority.

Integritetsskyddsmyndigheten, Box 8114, 104 20 Stockholm

or

E-mail address: imy@imy.se

1.5 What data do we collect?

Bellow you will find what types of personal data Pointsharp collects from you:

Category	Examples
Identifiers	First name, last name, e-mail address, phone number
Commercial information	Records of software products and/or services purchased, obtained, or considered
Internet or technical information	IP address, device information, browser type, referral source, length of visit, operating system, number of page views, which pages were viewed and similar information.
Professional information	Organization, Organizational position
Camera surveillance	Video footage, sound, still images.

2 Process of personal data

Pointsharp process personal data that you provide to us by your own choice in connection with your contact with us, for example by emailing us or entering into an agreement with Pointsharp.

We also process personal information during business relationship with you. Personal data can also be generated continuously during our business relationship with you as a result of your activities or when we fulfill legal obligations that is imposed us as an organization.

Pointsharp also process personal data if you use our web forms and by that we use cookies on our websites that collect information on and from your browser. More information about cookies can be reached in the cookie information on the current website.

Pointsharp ensures proper personal data management through risk analyses, contractual clauses, and impact assessments. We actively monitor current practices to stay updated about the newest development regarding the processing of personal data.

2.1 When you visit our main website

Some of our services require processing of your personal data when you interact with our websites, e-mail address, and online services. Some of the services may include service features, such as the information you provide when you complete forms or register to use our services.

We process personal data when you enter our main website, pointsharp.com, this may include personal data that can identify you. We may also request information about your preferences and usage of technology products and services.

Pointsharp process certain personal data when you use or visit our website, which is:

Directly from you: When you visit our website or provide your personal data in a form on our website, we will process that information.

Indirectly from you: When you navigate and interact with our website, some personal data is automatically collected by cookies and similar technologies. Some cookies are necessary to use different functionalities of our website. The personal data collected may include information about your computer and internet connection, like IP address and operating system. For more information about the cookies we use, see our Cookie Declaration where you have to make your choice regarding the use of cookies when you first visit our main website; "Allow all", "Allow selection", or "Deny". If you have already made your choice regarding the use of cookies you can find the Cookie Declaration by opening your web browser in private/incognito mode and connect to our main website.

Purpose of the processing – what we do and why	Our legal basis for processing	Types of personal data we collect and where they come from	How long do we store your personal data?
<p>Contact form – "Contact now" feature</p> <p>Administer contact forms for the purpose of being able to handle inquiries that come in through contact forms on Pointsharp's website and to be able to follow up requests over time.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1) (f).</p> <p>The processing is necessary for our legitimate interest in being able to administer and follow up requests from our customer contacts over time, which is the interest of the Data subject.</p>	<p>From you:</p> <ul style="list-style-type: none"> • Full name • E-mail address • Phone number • Organization • IP address • Message/Comments (optional, may include personal data given by the Subject) • Marketing activities 	<p>Pointsharp will not store your personal information longer than necessary for the purposes for which they were collected.</p> <p>Personal data that Pointsharp processes in order to ensure that we can offer our services to our customer contacts, or which we process to administer customer relationships and sales processes as long as you or the organization you are the contact person for is a customer of Pointsharp.</p> <p>Some personal data ceases to be necessary for Pointsharp already during an ongoing customer relationship, some in direct connection with the termination of the customer relationship, others Pointsharp needs to save for a shorter or longer period of time if necessary to comply with law, for example tax law, requirements, government decisions, accounting requirements and so on.</p>

Purpose of the processing – what we do and why	Our legal basis for processing	Types of personal data we collect and where they come from	How long do we store your personal data?
<p>Contact form "Free evaluation"</p> <p>Administer contact form for the purpose to provide potential customers with a free evaluation license, free remote installation support and full support during the evaluation period.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1) (f).</p> <p>The processing is necessary for our legitimate interest in being able to provide a 30-day free evaluation license, free remote installation and provide support during the evaluation, which is the interest of the Data subject.</p>		<p>How long we process your personal data for marketing purposes depends on whether you have left your consent to our processing or if our processing is done based on a balance of interests. For those of you who have agreed to receive direct marketing and newsletters from us we process your personal data until you unsubscribe, withdraw your consent, or otherwise ask us to stop contacting you for this purpose.</p>
<p>Contact form "Schedule a meeting"</p> <p>Administer contact form for the purpose to provide potential customers with free scheduled meetings as to discuss business offers.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1) (f).</p> <p>The processing is necessary for our legitimate interest in being able to provide a free scheduled meeting to discuss business offers with one of our product managers, which is the interest of the Data subject.</p>		

Purpose of the processing – what we do and why	Our legal basis for processing	Types of personal data we collect and where they come from	How long do we store your personal data?
<p>Contact form "Want to become a partner?"</p> <p>Administer contact form for the purpose to provide an opportunity to be contacted by a partner manager to discuss becoming a Pointsharp partner.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1) (f).</p> <p>The processing is necessary for our legitimate interest in being able to provide an opportunity to become a partner with Pointsharp, which is the interest of the Data subject.</p>		
<p>Subscribing to our newsletter "Latest info"</p> <p>To send marketing and non-marketing communications to users about Pointsharp services, features, news, updates, and events.</p>	<p>Your express consent as specified in Article 6(1)(a).</p> <p>The processing is necessary for our legitimate interest in being able to give marketing information regarding our products and solutions which is the interest of the Data subject.</p> <p>We process your personal data based on your consent and you may at any time, in whole or in part, withdraw your consent by contacting us.</p>		

Purpose of the processing – what we do and why	Our legal basis for processing	Types of personal data we collect and where they come from	How long do we store your personal data?
<p>Contact form "Contact us for a demo"</p> <p>Administer contact form for the purpose to provide an opportunity to be contacted by us for a demo.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1) (f).</p> <p>The processing is necessary for our legitimate interest in being able to provide an opportunity for you to take part in a demo, which is the interest of the Data subject.</p>		
<p>Contact form "More about Pointsharp"</p> <p>Administer contact form for the purpose to provide an opportunity to be contacted by us to get information about our organization.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1) (f).</p> <p>The processing is necessary for our legitimate interest in being able to provide an opportunity for you to get more information about Pointsharp, which is the interest of the Data subject.</p>		

Purpose of the processing – what we do and why	Our legal basis for processing	Types of personal data we collect and where they come from	How long do we store your personal data?
<p>Contact form "Supported Solutions"</p> <p>Administer contact form for the purpose to provide an opportunity to be contacted by us to get information about our organization's solutions.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1) (f).</p> <p>The processing is necessary for our legitimate interest in being able to provide an opportunity for the Data subject to get more information about Pointsharp solutions, which is the interest of the Data subject.</p>		
<p>Contact form "Download"</p> <p>Administer contact form for the purpose to provide technical documentation, describing our products and services, case studies and solutions, as ordered.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1) (f).</p> <p>The processing is necessary for our legitimate interest in being able to provide an opportunity for the Data subject to download technical documentation, which is the interest of the Data subject.</p>		

2.1.1 Recipients that Pointsharp might share your personal data with

Pointsharp uses contractors and service providers who perform services on our behalf, for example IT services and marketing services. In the performance of such service the contractor can gain access to personal data. We ensure that the recipient processes are in accordance with this privacy notice, such as by entering into data transfer agreements or data processor agreements with the recipients. Those agreements include all reasonable contractual, legal, technical, and organizational measures to ensure that your information is processed with an adequate level of protection and in accordance with applicable law.

We may disclose your personal data to other organizations included in the Pointsharp group. Your personal data may also be disclosed to and processed by third parties outside the Pointsharp group, such as to our partners and to service providers who process personal data on our behalf, so-called "Data Processors". We have agreements with our Data processors who ensure that they process your personal data in accordance with this privacy notice and our instructions. When you visit our main website, we may disclose your personal data to the following recipients.

The purposes why Pointsharp might share your personal data	Recipients	On premises or, for example in a server farm or in the cloud	Business description
IT system and contractors managing the necessary operations and support for us to be able to fulfill our obligations to you. They may only process your personal data following instructions from us.	HubSpot	Cloud service	Marketing platform regarding newsletters

2.2 Contact persons as a corporate customer

Personal data is provided by your representatives when you purchase a service or a product. Pointsharp respect your right to privacy, and we take our related legal obligations seriously. We aim to be transparent and have provided this notice to ensure that you as a customer and your individual representatives understand what personal data we may be collected from you and registered, what we may use it for and how we secure it.

- **Contact person at a potential customer:** We process personal data of a contact person or a representative of a potential customer who may be interested in our services and/or products.
- **Contact person at a customer:** We process personal data of a contact person or representative of our customer.

Purpose of the processing - what we do and why	Our legal basis for processing	Types of personal data we collect and where they come from	How long do we store your personal data?
<p>Contact person as a potential corporate customer "Marketing"</p> <p>We process personal data for the purpose of being able to contact you to market our products and services through direct marketing via e-mail address.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1) (f).</p> <p>The processing is necessary for our legitimate interest in being able to market products and services which we think your organization may be interested in. Our interest in processing your personal data for this purpose precedes your possible interest in protecting your privacy due to benefits to our customer contacts.</p> <p>If, however, you have refused marketing from us, we will not send marketing to you.</p>	<p>From you:</p> <ul style="list-style-type: none"> • Full name • E-mail address • Phone number • Organization • Organizational position • Address • Information you choose to share by e-mail, SMS or under a personal meeting 	<p>Pointsharp will not store your personal information longer than necessary for the purposes for which they were collected.</p> <p>Personal data that Pointsharp processes in order to ensure that we can offer our products and services to our customer, or which we process to administer customer relationships and sales will be stored as long as you or the organization you are the contact person for is a customer of Pointsharp.</p> <p>Some personal data ceases to be necessary for Pointsharp already during the ongoing business relationships, some in direct connection to the termination of the business relationships, others we need to save for a shorter or longer period of time if necessary to comply with law, for example tax law, requirements, government, decisions, accounting requirements. Pointsharp will process information that is necessary for bookkeeping at least seven years after the end of the year in which the information was registered.</p>

Purpose of the processing - what we do and why	Our legal basis for processing	Types of personal data we collect and where they come from	How long do we store your personal data?
<p>Contact person as a corporate customer "Marketing"</p> <p>We process personal data for the purpose of being able to contact you to market our products and services through direct marketing via e-mail address.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1) (f).</p> <p>The processing is necessary for our legitimate interest in being able to market products and services which we think your organization may be interested in. Our interest in processing your personal data for this purpose precedes your possible interest in protecting your privacy due to benefits to our customer contacts.</p> <p>If, however, you have refused marketing from us, we will not send marketing to you.</p>		<p>How long we process your personal data for marketing purposes depends on whether you have left your consent to our treatment or if our treatment is done based on a balance of interests. For those of you who have agreed to receive direct marketing from us we process your personal data until you withdraw your consent or otherwise ask us to stop contacting you for this purpose.</p>

Purpose of the processing - what we do and why	Our legal basis for processing	Types of personal data we collect and where they come from	How long do we store your personal data?
<p>Contact person as a corporate customer "Maintain business relationship"</p> <p>We process personal data about you and the organization you represent for the purpose to be able to maintain contact with you as a contact person for a corporate customer and administer measures related to the customer relationship and the agreements we are intended into. Processing of personal data is related to the organization you represent and to organizations activities and not to the contact persons privacy. Our processing of personal data is clearly predictable for contact persons.</p> <p>The contact will only be effective if it takes place directly to the contact persons appointed by the contracting party.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1) (f).</p> <p>The processing is necessary for our legitimate interest in being able to maintain contact with our customers to follow up obligations according to agreements but also quotes, deliveries and administer measures related to the customer relationship.</p> <p>If you are a contact person from a sole proprietorship, the processing is necessary to fulfill an agreement and to exercise their contractual rights towards the organization. The legal basis is specified in Article 6(1)(b).</p>		

Purpose of the processing - what we do and why	Our legal basis for processing	Types of personal data we collect and where they come from	How long do we store your personal data?
<p>We also process information and information about the organization you represent to establish contractual documentation of what has been agreed between the organization you represent and Pointsharp.</p> <p>This personal data is also processed for the purpose of handling information and invoicing.</p> <p>To the extent that e-mail address correspondence contains personal data, we process these for the purpose of establishing or create relationships and enable internal and external communication.</p>			
<p>Contact person at a former customer "Legal obligations"</p> <p>Pointsharp will store information about previous customers and contact persons representing them for a certain period of time even after they are no longer relevant to us for the purpose of following obligations.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1) (c).</p> <p>The processing is necessary to fulfill legal obligation to which Pointsharp is imposed.</p>		

Purpose of the processing - what we do and why	Our legal basis for processing	Types of personal data we collect and where they come from	How long do we store your personal data?
<p>Contact person as a corporate customer "For accounting"</p> <p>For accounting purposes, we process information about the transaction that took place between us and corporate customers. For that reason, we may process names and contact information that appears on the invoice or in other accounting documents.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1) (c).</p> <p>The processing is necessary to fulfill legal obligation to which Pointsharp is imposed.</p>		
<p>Contact person "To enter into confidentiality agreements"</p> <p>We process personal data of the corporate customer for the purpose of entering into a confidentiality agreement with you as a contact person or representative.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1) (f).</p> <p>The processing is necessary for our legitimate interest in being able to secure a personal commitment to cooperation or confidentiality prior to the signing of contractor agreements, etc.</p> <p>You can contact us for more information about how this determination was made.</p>		

Purpose of the processing - what we do and why	Our legal basis for processing	Types of personal data we collect and where they come from	How long do we store your personal data?
<p>Subscribing to our newsletter "Marketing"</p> <p>Send marketing and non-marketing communications to users about Pointsharp services, features, news, updates, and events for the purpose of being able to communicate the content.</p>	<p>Your express consent as specified in Article 6(1)(a).</p> <p>If we process your personal data based on your consent, you may at any time, in whole or in part, withdraw your consent by contacting us.</p>		

2.2.1 Recipients that Pointsharp might share your personal data with

Pointsharp uses partners and service providers who perform services on our behalf for example IT services and marketing services. In the performance of such service the partner or the service provider can gain access to personal data. We ensure that the recipient processes are in accordance with this privacy notice, such as by entering into data transfer agreements or data processor agreements with the recipients. Those agreements include all reasonable contractual, legal, technical, and organizational measures to ensure that your information is processed with an adequate level of protection and in accordance with applicable law.

We may disclose your personal data to other companies included in the Pointsharp group. Your personal data may also be disclosed to and processed by third parties outside the Pointsharp group, such as to our partners and to service providers who process personal data on our behalf, so-called "Data Processors". We have agreements with our Data processors who ensure that they process your personal data in accordance with this privacy notice and our instructions. When you are a contact person as a corporate customer, we may disclose your personal data to following recipients.

The purposes why Pointsharp might share your personal data	Organization and (IT system)	Personal data in a server farm or in the cloud	Business description
IT system and contractors managing the necessary operations and support for us to be able to fulfill our obligations to you. They may only process your personal data following instructions from us.	Synch (Wesynch)	Cloud service	Archiving of agreements
	HubSpot	Cloud service	Marketing platform regarding newsletters
	Microsoft (Teams)	Cloud service	Communication platform and collaboration tools
Bank, finance and auditor used by Pointsharp may receive personal information about you, for example when you provide payment.	Payment solutions	Cloud service	For example: Mastercard, VISA, AMEX, PayPal, Swish
	UC	Cloud service	Check of company signatories
	Visma (Visma Webshop)	Cloud service	Webshop for ordering of Pointsharp products
	(ExFlow)		Transfer of invoices from Redsoft to business system
	Redsoft	Cloud service	Scanning of invoices

The purposes why Pointsharp might share your personal data	Organization and (IT system)	Personal data in a server farm or in the cloud	Business description
	Fortnox	Cloud service	Business system

2.3 When you visit our support website (support.pointsharp.com)

Pointsharp's support website provides the functionalities of the service to authenticated users, to provide technical information on our products, best practices, information on how to handle certain issues, incident reporting, information on using third party products, and help when configuring our products. To give you and your organization our full services, the processing of personal data is necessary.

- **Representative person at a corporate customer:** We process personal data of a contact person or representative of our customer.
- **Private person:** We process personal data if you as a non-customer choose to register an account.

Purpose of the processing - what we do and why	Our legal basis for processing	Types of personal data we collect and where they come from	How long do we store your personal data?
<p>Representatives at the corporate customer "Register an account"</p> <p>We process your personal data in connection with contract writing and when Pointsharp needs to make changes due to customer requests. The purpose is to provide you with the support tools, handle and simplify administration and management tools for all tokens, certificates and more, to support infrastructure.</p>	<p>The legal basis is specified in Article 6(1)(b).</p> <p>The processing is necessary to fulfill an agreement and so the Data subject can request their contractual rights towards Pointsharp, which is the interest of the Data subject.</p>	<p>From you:</p> <ul style="list-style-type: none"> • Full name • E-mail address • Phone number • Organization • Country • Time zone • Potential personal data given by you in support issues and e-mails. 	<p>Pointsharp will not store your personal data longer than necessary for the purposes of which they were collected.</p> <p>Personal data that Pointsharp processes in order to ensure that we can offer our services to our customer, or which we process to administer customer relationships and sales processes as long as you or the organization you are representatives for is a customer of Pointsharp.</p>
<p>Private person "Register an account"</p> <p>We process your personal data if you as a non-customer, choose to register an account on support.pointsharp.com on your own initiative for the purpose to manage your account.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1)(f).</p> <p>The processing is necessary for our legitimate interest in being able to administer support and follow up requests from you as a register, which is the interest of the Data subject.</p>		<p>Some personal data ceases to be necessary for Pointsharp already during an ongoing customer relationship, some in direct connection with the termination of the customer relationship, others need Pointsharp to save for a shorter or longer period of time if necessary to comply with law for example tax law, requirements, government decisions, accounting requirements and so on.</p>

Purpose of the processing - what we do and why	Our legal basis for processing	Types of personal data we collect and where they come from	How long do we store your personal data?
<p>Representatives at the corporate customer and private person "Communication and support"</p> <p>We process your personal data for the purpose to authenticate you when communicating with you regarding reported support issues and incidents.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1) (f).</p> <p>The processing is necessary for our legitimate interest in being able to administer support and follow up requests from you as a representative and private person, which is the interest of the Data subject.</p>		

2.4 When you visit our showroom

The Showroom allows customers, potential customers and partners to try out the functions of our software products and services. Pointsharp uses personal data to provide customer support to monitor and enabling communication.

Pointsharp collect personal information only to the extent necessary to fulfil a precise purpose related to our tasks and obligation. We only collect information from authenticated users (where the authentications have been previously carried out via one of our products). You as a user are responsible for all the possible personal data that you register in the showroom. The recommendation is to use fake personal data and not data related to real persons when doing tests in the showroom.

- **Representative person at a corporate customer:** We process personal data from a contact person or representative from our customer.

Purpose of the processing - what we do and why	Our legal basis for processing	Types of personal data we collect and where they come from	How long do we store your personal data?
<p>Representatives as a corporate customer "Communication and support"</p> <p>We process your personal data for the purpose to communicate with you regarding authentication- and reported support issues and handle reported incidents.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1)(f).</p> <p>The processing is necessary for our legitimate interest in being able to administer support and follow up requests from you as a representative, which is the interest of the Data subject.</p>	<p>From you:</p> <ul style="list-style-type: none"> • Full name • E-mail address • Phone number • Organization • X.509 certificate and its content • Personal data added by the Data subject 	<p>Pointsharp will not store your personal information longer than necessary with regard to its purposes for which they were collected.</p> <p>Personal data that Pointsharp processes in order to ensure that we can offer our services to our customer, or which we process to administer customer relationships and sales processes as long as you or the organization you are representatives for is a customer of Pointsharp.</p> <p>Some personal data ceases to be necessary for Pointsharp already during an ongoing customer relationship, some in direct connection with the termination of the customer relationship, others need Pointsharp to save for a shorter or longer period of time if necessary to comply with law for example tax law, requirements, government decisions, accounting requirements and so on.</p>

2.5 When you visit our service website (service.pointsharp.com)

Pointsharp's service website allows authenticated users at customers to test certificate logins with Pointsharp clients, primarily using mutual TLS, with different configurations. Authenticated SITHS users may download current versions of Net iD for SITHS client packages (Net iD Enterprise and Net iD Client). The website also provides the

opportunity for technical support to developer's for integration with various third-party software.

Pointsharp collect personal information only to the extent necessary to fulfil a precise purpose related to our tasks and obligation. We only collect information from authenticated users (where the authentications have been previously carried out via one of our products) as log entries. Log entries with the personal data are purged after three months.

- **Representative person at a corporate customer:** We process personal data from a contact person or representative from our customer.

Purpose of the processing - what we do and why	Our legal basis for processing	Types of personal data we collect and where they come from	How long do we store your personal data?
<p>Representatives as a corporate customer "Communication and service"</p> <p>We process your personal data for the purpose to provide the service features in accordance with agreement with the customer.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1)(f).</p> <p>The processing is necessary for our legitimate interest in being able to administer and follow up service requests from you as a representative for our customer, which is the interest of the Data subject.</p>	<p>From you:</p> <ul style="list-style-type: none"> • X.509 certificate content, including: <ul style="list-style-type: none"> • Full name • Subject serialnumber • Organization • Token information • OS version • Browser version 	<p>Pointsharp will not store your personal information longer than necessary with regard to it purposes for which they were collected.</p> <p>Personal data that Pointsharp processes in order to ensure that we can offer our services to our customer, or which we process to administer customer relationships and sales processes as long as you or the organization you are representatives for is a customer of Pointsharp.</p>
<p>Representatives as a corporate customer "Support"</p> <p>We process your personal data for the purpose to provide you with the requested support to maintain the contractual relationship with you and your organization.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1)(f).</p> <p>The processing is necessary for our legitimate interest in being able to administer and follow up support requests from you as a representative for our customer.</p>		<p>Some personal data ceases to be necessary for Pointsharp already during an ongoing customer relationship, some in direct connection with the termination of the customer relationship, others need Pointsharp to save for a shorter or longer period of time if necessary to comply with law for example tax law, requirements, government decisions, accounting requirements and so on.</p>
<p>Representatives as a corporate customer "Test purposes"</p> <p>We process your personal data for the purpose to provide you with tools to test login when using our software.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1)(f).</p> <p>The processing is necessary for our legitimate interest in being able to offer you the possibility to make login tests.</p>		

Purpose of the processing - what we do and why	Our legal basis for processing	Types of personal data we collect and where they come from	How long do we store your personal data?
<p>Representatives as a corporate customer "Download" Pointsharp client software: SITHS packages</p> <p>We process your personal data for the purpose to provide you with Pointsharp client software packages to maintain the contractual obligations with Inera.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1)(b).</p> <p>The processing is necessary for our legitimate interest in being able to fulfil our contract in providing you the possibility to download software.</p>		

2.6 When you visit pointsharpsecurecloud.com website

[Pointsharpsecurecloud.com](https://pointsharpsecurecloud.com) contains only important information about the service and we have deliberately chosen not to save information about the users. The security of our website and of the personal data collected is protected by adequate technical and organizational measures.

Purpose of the processing - what we do and why	Our legal basis for processing	Types of personal data we collect and where they come from	How long do we store your personal data?
<p>"Session cookie"</p> <p>Pointsharps session cookie are used to keep track of your login (if you are logged in), register the language setting and to facilitate navigation while you are on our website.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1)(f).</p> <p>The processing is necessary for our legitimate interest in the features of the website, which facilitates for the user and therefore is in the interest of the Data subject.</p>	<p>From you:</p> <ul style="list-style-type: none"> • The language setting, and • Log data (locally) 	<p>Session cookies is temporarily stored in your computer's memory while you are on our website and will disappear when you close your browser.</p>

2.7 When you participate our webinars

If you participate in one of our webinars, we process your personal data with the purpose of administering, implementing, and following up the quality of our webinar. Pointsharp collect certain personal information from you directly, only to the extent necessary to fulfil a precise purpose related to our tasks.

- **Participants in our webinars:** We process your personal data when you choose to participate in our webinars.

Purpose of the processing - what we do and why	Our legal basis for processing	Types of personal data we collect and where they come from	How long do we store your personal data?
<p>Participant "Register"</p> <p>We process your personal data when you sign up for an upcoming webinar. The purpose of processing the personal data is to administer, implement and monitor the quality of our webinars.</p>	<p>Your express consent as specified in Article 6(1)(a).</p> <p>Those who choose to attend webinars affirms an interest in participating and gives us an active consent to process their personal data.</p>	<p>From you:</p> <ul style="list-style-type: none"> • Full name • E-mail address • Organization • Phone number • Organizational position • Country • Registration data/log • Webinar activities 	<p>Pointsharp will not store your personal data longer than necessary for the purposes for which we collected it. We may keep your information for a longer period of time for historical, statistical, scientific purposes with the appropriate security measures taken.</p> <p>When data processing is based on your consent, you have the right to withdraw your consent at any time and the right to request erasure of your personal data.</p>
<p>Participant "Communication"</p> <p>For the purpose to respond to your questions and concerns, sending you administrative message and information, including support messages, notifications about changes.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1)(f).</p> <p>The processing is necessary for our legitimate interest in being able to communicate for the upcoming webinar and for those who have participated.</p>		
<p>Participant "preferences"</p> <p>We process your personal data for the purpose to manage your account preferences so that we can follow up after you have participated in one of our webinars.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1)(f).</p> <p>The processing is necessary for our legitimate interest in being able to monitor the quality and the participation from the webinar.</p>		

2.7.1 Recipients that Pointsharp might share your personal data with

Pointsharp hires partners and service providers who perform services on our behalf for example IT-services and marketing services. In the performance of such service can partner/the service provider gain access to personal data. We ensure that the recipient processes are in accordance with this privacy notice, such as by entering into data transfer agreements or data processor agreements with the recipients. Those agreements include all reasonable contractual, legal, technical, and organizational measures to ensure that your information is processed with an adequate level of protection and in accordance with applicable law.

We may disclose your personal data to other companies included in the Pointsharp group. Your personal data may also be disclosed to and processed by third parties outside the Pointsharp group, such as to our partners and to service providers who process personal data on our behalf, so-called "Data Processors". We have agreements with our Data processors who ensure that they process your personal data in accordance with this privacy notice and our instructions. When you participate our webinars, we may disclose your personal data to following recipients.

The purposes why Pointsharp might share your personal data	Organization and (IT system)	In a server farm or in the cloud	Business description
IT system and contractors managing the necessary operations and support for us to be able to fulfill our obligations to you. They may only process your personal data following instructions from us.	WebinarGeek	Cloud service	Service for webinars
	HubSpot	Cloud service	Marketing platform regarding newsletters

2.8 When you visit us on an exhibition

When you visit us at a fair or exhibition, we collect personal data directly from you with purpose to establish a business relation or give you information about our products and services that Pointsharp believes would be of interest. Pointsharp only collect personal data that is reasonably necessary for its activities. The types of personal data that we collect will depend on the nature of the interaction between you and Pointsharp, and where and how we collect the information:

- **Exhibition visitors:** We process personal data when you decide to share information with us related to an exhibition.

Purpose of the processing - what we do and why	Our legal basis for processing	Types of personal data we may collect and where they come from	How long do we store your personal data?
<p>Visitors "Correspondence"</p> <p>When you visit us at an exhibition, we process your personal data for example when you send us correspondence by e-mail, deal with us over the telephone or in person, request a quote or information, provide online feedback, or provide contact details in relation to an exhibition.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1)(f).</p> <p>The processing is necessary for our legitimate interest in being able to establish a business relation or give you information about our products and services that Pointsharp believes would be of you and/or your organization interest.</p>	<p>From you:</p> <ul style="list-style-type: none"> • Full name • E-mail address • Social media urls • Phone number • Organization • Address • Information you provide 	<p>No longer than necessary for the purposes for which we collected it. We may, however, keep your information for a longer period for historical, statistical, or scientific purposes with the appropriate safeguards in place.</p>

2.9 When you visit one of our premises (camera surveillance)

When you visit or are nearby one of our premises you may be recorded by our camera surveillance system, Pointsharp will process the video and sound recordings from the surveillance cameras. Our surveillance is intended to keep us all and our business secure and is a measure taken by us in order to guard our premises. Signs informing about the camera surveillance are visible at all areas covered by the surveillance.

- **Data subject captured in the cameras shooting area:** When you are visiting one of our premises, your personal data may be processed by our camera surveillance.

Purpose of the processing - what we do and why	Our legal basis for processing	Types of personal data we collect and where they come from	How long do we store your personal data?
<p>Visitors and employees "Camera surveillance"</p> <p>When you are visiting our premises, your personal data will be processed as part of our security measures to ensure the security of our employees, customers, partners and contractors.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1)(f).</p> <p>The processing is necessary for our legitimate interest of security. The Camera surveillance strive to preventing, detecting, or facilitate investigating crime.</p> <p>Any processing of personal data about offenses involving crime only takes place if the processing is necessary for legal claims to be established, asserted, or defended in an individual case.</p>	<p>Our surveillance system captures the following from you:</p> <ul style="list-style-type: none"> • Video • Sound • Still images 	<p>Pointsharp will store personal data for a maximum of 30 days or in case of an incident as long as necessary to fulfill the purpose described in mandatory legal requirements, or a legal claim.</p> <p>Pointsharp regularly assesses the necessity of camera surveillance and the need to store the personal data generated in connection with it, as well as the legal basis for processing in accordance with its internal operating instructions. In addition, Pointsharp will conduct all reasonable measures to ensure that, considering the purpose of the processing, all inaccurate or obsolete personal data will be erased or rectified without delays.</p>

2.10 Contractors and service providers

Within the framework of its business operations, Pointsharp processes personal data including their contractors and potential contractors and other business contacts. We care to always processes personal data in a responsible and correct manner, in accordance with applicable laws and regulations, such as the General Data Protection Regulation (GDPR).

We process personal data about the following categories of contractors, as all who comes in contact with us, purchasing organizations at Pointsharp:

- **Contact person at a potential contractor.** We process personal data about contact person or representative of a contractor who may be interested in delivering services and/or products to Pointsharp.
- **Contact person at the contractor.** We process personal data about the contact person or representative of a contractor that has an ongoing business relationship with Pointsharp.

Purpose of the processing - what we do and why	Our legal basis for processing	Types of personal data we collect and where they come from	How long do we store your personal data?
<p>Contact person "For obtaining quotes"</p> <p>We process personal data from you as a represent for the purpose of being able to obtain quotes from the contractor you work with for and to be able to evaluate the business offer.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1) (f).</p> <p>The processing it necessary for our legitimate interests in being able to decide on the terms of the transaction, e.g., price and delivery terms, which is the interest of the contractor and indirect the Data subject.</p>	<p>From you:</p> <ul style="list-style-type: none"> • Full name • E-mail address • Phone number • Organization • Organizational position • Address • Information about your contractor • Information as stated in quotes from the contractor • Information in correspondence such as e-mail 	<p>Pointsharp will not store your personal data for longer than necessary regarding the purposes of which they were collected.</p> <p>Personal data that Pointsharp processes to ensure that we can purchase relevant services from our contractor contacts, or whom we process to administer business relationships and purchases, processed as long as you or the contractor you represent is a contractor to Pointsharp. Some personal data ceases to be necessary for Pointsharp already during the ongoing business relationships, some in direct connection to the termination of the business relationships, others we need to save for a shorter or longer period of time if necessary to comply with law for example tax law, requirements, government, decisions, accounting requirements etc.</p>
<p>Contact person "To maintain contact and administer the business relationship"</p> <p>We process personal data from you as a represent for the purpose of being able to maintain contact with you as a contractor and administer actions related to the business relationship.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1) (f).</p> <p>The processing is necessary for our legitimate interest in being able to maintain contact with our contractors and to be able to keep track of the business relationship, which is the interest of the contractor and indirect the Data subject.</p>		

<p>Contact person "Conclusion of a contractor agreement"</p> <p>We process personal data about you as a represent for the purpose of draw up contract documentation on what has been agreed between the contractor you represent and Pointsharp. This personal data is also processed for the purpose of being able to handle orders, information, and invoicing in connection with the purchase.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1) (f).</p> <p>The processing is necessary for our legitimate interest in being able to conclude contracts and to establish documentation of the agreement that we have with a contractor. The processing is also necessary to take relevant actions in connection with the fulfillment of the purchase.</p>		
<p>Contact person "Communication by e-mail"</p> <p>To the extent that e-mail correspondence includes personal data, we process it for the purpose of maintaining or create business relationships and enable internal and external communication.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1) (f).</p> <p>The processing is necessary for our legitimate interest in being able to maintain or create business relationships and communicate both internally and externally by e-mail.</p> <p>You can contact us if you want more information about how the determination was made.</p>		

<p>Contact person "To be able to give our contractors access to systems"</p> <p>We process personal data for the purpose of giving you as a represent access to our systems and work tools.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1) (f).</p> <p>The processing is necessary for our legitimate interest in maintaining tools and features to enable collaboration with our contractors, which is the interest of the contractor and indirect the Data subject.</p>		
<p>Contact person "To enter into confidentiality and cooperation agreements"</p> <p>We process personal data for the purpose of entering into a confidentiality agreement and/or a cooperation agreement with you as a representative of the contactor, or if you work as an in-house consultant.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1) (f).</p> <p>The processing is necessary for our legitimate interest in being able to secure a personal commitment to cooperation or confidentiality prior to the signing of contractor agreements, etc.</p> <p>You can contact us for more information about how this determination was made.</p>		

2.10.1 Recipients that Pointsharp might share your personal data with

Pointsharp hires partners and service providers who perform services on our behalf for example IT-services and marketing services. In the performance of such service can partner/the service provider gain access to personal data. We ensure that the recipient processes are in accordance with this privacy notice, such as by entering into data transfer agreements or data processor agreements with the recipients. Those agreements include all reasonable contractual, legal, technical, and organizational measures to ensure that your information is processed with an adequate level of protection and in accordance with applicable law.

We may disclose your personal data to other companies included in the Pointsharp group. Your personal data may also be disclosed to and processed by third parties outside the Pointsharp group, such as to our partners and to service providers who process personal data on our behalf, so-called "Data Processors". We have agreements with our Data processors who ensure that they process your personal data in accordance with this privacy notice and our instructions. When you are a contractor or a sub-contractor, we may disclose your personal data to following recipients.

The purposes why Pointsharp might share your personal data	Organization and (IT system)	In a server farm or in the cloud	Business description
IT system and contractors managing the necessary operations and support for us to be able to fulfill our obligations to you. They may only process your personal data following instructions from us.	Synch (Wesynch)	Cloud service	Archiving of agreements
Bank, finance and auditor used by Pointsharp may receive personal information about you, for example when you provide payment.	Fortnox	Cloud service	Business system

2.11 Partners and business relationships

Pointsharp processes personal data about its partners and business relationships. We care to always processes personal data in a responsible and correct manner, in accordance with applicable laws and regulations, such as the General Data Protection Regulation (GDPR).

We process personal data in the following categories of in cases where you come in contact with our purchasing organizations at Pointsharp:

- **Business relationships (individual)**, we may process your personal data about you in other cases where you are not a representative for a organization, for example self-employed.

- **Representatives of legal entity**, we process personal data about the representative or contact person for a legal entity as well as other persons who come into contact with Pointsharp in connection with general meetings.

Purpose of the processing - what we do and why	Our legal basis for processing	Types of personal data we collect and where they come from	How long do we store your personal data?
<p>Representative Contact form "Want to become a partner?"</p> <p>We process personal data about you as a represent for the purpose of being able to handle requests from you to become a partner.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1)(f).</p> <p>The processing is necessary for our legitimate interest in being able to provide an opportunity for you to become a partner with Pointsharp.</p> <p>You can contact us for more information about how this determination was made.</p>	<p>From you:</p> <ul style="list-style-type: none"> • Full name • E-mail address • Phone number • Organization • Organizational position • Address • Information you provide 	<p>Pointsharp will not store your personal information longer than necessary regarding the purposes of which they were collected.</p> <p>The personal data will be stored as long as you or the organization you are representative for is a partner for or have a partner- or business relationship with Pointsharp.</p> <p>Some personal data ceases to be necessary for Pointsharp already during the ongoing business relationships, some in direct connection to the termination of the business relationships, others we need to save for a shorter or longer period of time if necessary to comply with law for example tax law, requirements, government, decisions, accounting requirements and so on. For example, during the period in which the bookkeeping is considered and seven years after the end of the year in which the information was registered.</p>

Purpose of the processing - what we do and why	Our legal basis for processing	Types of personal data we collect and where they come from	How long do we store your personal data?
			<p>How long we process your personal data for marketing purposes depends on whether you have left your consent to our treatment or if our treatment is done based on a balance of interests (which is normally). For those of you who have agreed to receive direct marketing from us we process your personal data until you withdraw your consent or otherwise ask us to stop contacting you for this purpose.</p>
<p>Representative "Communicate news about Pointsharp etc."</p> <p>We process personal data for the purpose of being able to communicate news about our business, including mailings such as newsletters. We may also process names and contact information for the purpose to handle other communication with you as a representative.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1)(f).</p> <p>The processing is necessary for our legitimate interests in being able to communicate new about Pointsharp business to you as a contact person or representative. Our interests in treating your personal data for this purpose takes precedence over your possible interests in protecting your personal integrity.</p>		

Purpose of the processing - what we do and why	Our legal basis for processing	Types of personal data we collect and where they come from	How long do we store your personal data?
<p>Representative "Conclusion of a partner agreement"</p> <p>We process personal data about you as a represent for the purpose of draw up contract documentation of what has been agreed between the partner you represent and Pointsharp.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1)(f).</p> <p>The processing is necessary for our legitimate interest in being able to handle the conclusion of contracts and establish documentation of the agreement we have with a partner and carry out the relevant actions in connection with the fulfillment of the purchase.</p> <p>You can contact us for more information about how this determination was made.</p>		

Purpose of the processing - what we do and why	Our legal basis for processing	Types of personal data we collect and where they come from	How long do we store your personal data?
<p>Representative "Maintain partner and business relationship"</p> <ul style="list-style-type: none"> We process personal data about you and the organization you represent for the purpose of to maintain contact with you as a representative for a corporate customer, and to administer measures related to the business relationship and the agreements we are intended into. Processing of personal data is related to the organization you represent and to organizations activities and not to the contact persons privacy. Our processing of personal data is clearly predictable for contact persons. <p>The contact will only be effective if it takes place directly to the contact persons appointed by the contracting party.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1)(f).</p> <p>The processing is necessary for our legitimate interest in being able to maintain contact with our customers to follow up obligations according to agreements but also quotes, deliveries and administer measures related to the customer relationship.</p> <p>The contact will only be effective if it takes place directly to the contact persons appointed by the contracting party.</p> <p>If you are a contact person from a sole proprietorship, the processing is necessary to fulfill an agreement and to exercise their contractual rights towards Pointsharp. The legal basis is specified in Article 6(1)(b).</p>		

Purpose of the processing - what we do and why	Our legal basis for processing	Types of personal data we collect and where they come from	How long do we store your personal data?
<ul style="list-style-type: none"> We also process information of the representative contact and information about you as a represent for the purpose of to establish contractual documentation of what has been agreed between the organization you represent and Pointsharp. <p>This personal data is also processed for the purpose of managing information and invoicing.</p> <ul style="list-style-type: none"> To the extent that e-mail correspondence contains personal data, we process these for the purpose of establishing or create business relationships and enable internal and external communication. 			

Purpose of the processing - what we do and why	Our legal basis for processing	Types of personal data we collect and where they come from	How long do we store your personal data?
<p>Contact person "To enter into confidentiality agreements"</p> <p>We process personal data of the business partner for the purpose of entering into a confidentiality agreement with you as a contact person or representative.</p>	<p>The processing is based on a balance of interests as specified in Article 6(1)(f).</p> <p>The processing is necessary for our legitimate interest in being able to secure a personal commitment to cooperation or confidentiality prior to the signing of contractor agreements, etc.</p> <p>You can contact us for more information about how the determination is made.</p>		

2.11.1 Recipients that Pointsharp might share your personal data with

Pointsharp hires partners and service providers who perform services on our behalf for example IT-services and marketing services. In the performance of such service can partner/the service provider gain access to personal data. We ensure that the recipient processes are in accordance with this privacy notice, such as by entering into data transfer agreements or data processor agreements with the recipients. Those agreements include all reasonable contractual, legal, technical, and organizational measures to ensure that your information is processed with an adequate level of protection and in accordance with applicable law.

We may disclose your personal data to other companies included in the Pointsharp group. Your personal data may also be disclosed to and processed by third parties outside the Pointsharp group, such as to our partners and to service providers who process personal data on our behalf, so-called "Data Processors". We have agreements with our Data processors who ensure that they process your personal data in accordance with this privacy notice and our instructions. When you visit our main website, we may disclose your personal data to following recipients.

The purposes why Pointsharp might share your personal data	Organization and (IT system)	In a server farm or in the cloud	Business description
IT system and contractors managing the necessary operations and support for us to be able to fulfill our obligations to you. They may only process your personal data following instructions from us.	Synch (Wesynch)	Cloud service	Archiving of agreements
	HubSpot	Cloud service	Marketing platform regarding newsletters

3 General information about recipients and third-country transfers

3.1 Recipients

3.1.1 Contractors and service providers

In cases when contractors or service providers is used by Pointsharp as a personal data processor your personal data will be processed by them. The processing will in those cases be obtained from Pointsharp and is conducted in our stead. The processor cannot use your personal data for their own purposes, and they are obliged by law and agreement to protect your personal data.

3.1.2 Authorities

Pointsharp may provide necessary information to authorities such as the police, financial authorities, tax authorities or other authorities and courts of law.

Purpose and legal basis: Pointsharp will share your personal data with authorities when it is required by law, if you have asked us to do so, or if required to manage tax deductions or counter crime. Depending on the authority and purpose, the legal basis is the obligation to comply with Article 6(1)(c) of the GDPR.

In general, Pointsharp and Pointsharp's partners process your personal data within the EU and EEA. Should personal data be processed outside the EU/EEA, Pointsharp will take measures to ensure that personal data continue to be equally protected and take necessary measures to legally transfer personal data to countries outside the EU/EEA in accordance with GDPR.

3.1.3 Other entities within the Pointsharp Group

Your personal data will be disclosed to and processed at other companies within the Pointsharp group, if necessary.

Purpose and legal basis: We will share your personal data, for example, for the purpose of customer experience management and to fulfill customer agreements. The legal basis is legitimate interests as in Article 6(1)(f).

How Pointsharp process your personal data internally: Pointsharp strive to restrict the internal access and the number of people that are accessing your personal data. Pointsharp minimize the scope of personal data, and no more personal data than what is necessary to fulfil the purpose of the processing will be processed.

3.1.4 Social media

Pointsharp uses social media to present our work through widely used communications channels.

For instance, you can watch Pointsharp videos, which we also upload to our YouTube page and follow links from our website to Twitter, LinkedIn and Facebook.

If you have any concerns or questions about these services use of your personal data, you should read their privacy notices carefully before using them.

Purpose and legal basis: If you contact us through social media such as Facebook and Twitter, your personal information will also be processed by these companies, in accordance with their privacy notice. The processing is necessary to provide communication opportunities as in Article 6(1)(f).

3.2 Transferring of your personal data outside of the EU/EEA

Pointsharp always strives to process your personal data within the EU/EEA area, however, in certain situations we may share your information with our contractors and service providers who are based outside of the EU/EEA. General Data Protection Regulation (GDPR) means that all EU member states have equal protection of personal data and personal integrity, which is why personal data can be transferred freely within the EU/EEA. For a country outside the EU/EEA, so called third countries, there is no corresponding protection for personal data and personal integrity.

If your personal data is shared with recipients in third countries, that is, with recipients whose registered office or place of business is not an EU/EEA member state, then this is done on the basis of adequacy decisions adopted by the European Commission pursuant to article 45 GDPR, or subject to appropriate and adequate safeguards for data transfer pursuant to article 46(f) GDPR, or on the basis of the derogations under article 49 GDPR. If you would like more information about how we protect your personal data when transferring it to countries outside EU/EEA in particular situations, you can get in touch with us using the contact information provided at the beginning of the document.

3.3 Security measures

Pointsharp processes personal data in a way that ensures appropriate security for the personal data, for instance in purpose to prevent personal data incidents. It is implemented through technical and organizational measures within the Pointsharp group. The level of safety measures is assessed in relation to the risks and type of personal data processing. Organizational measures can, for example be, that Pointsharp uses authorization controls and logging systems that contain personal data and shell protection for entry and exit in Pointsharp's premises. Technical safety measures can, for example be, that Pointsharp uses secured wireless networks, MFA protection for mobile devices, e-mail encryption when needed and protect personal data in transit between your client and our website by using TLS secure protocol ensuring their confidentiality and integrity.

3.4 Other security measures

3.4.1 GDPR awareness among employees

At Pointsharp, we are of the opinion that all employees have a responsibility to understand what applies regarding personal data protection laws, including the GDPR. Pointsharp continuously educates its employees and support them based on the employee's actual needs in relation to the employees' position at Pointsharp, in terms of personal data processing.

3.4.2 Risk and impact assessment

Pointsharp is responsible for identifying and classifying privacy risks with each planned personal data processing. Pointsharp therefore conducts a risk analysis of planned personal data processing. Likely high privacy risks for individual's rights and freedoms can for example occur in the processing of sensitive personal data or if processing takes place on a large scale. If a processing of personal data is likely to entail a high risk for an individual's rights and freedoms, an assessment is made of the effects of the planned measures for the protection of personal data.

3.4.3 Audits and GDPR compliance

Audits of Pointsharp's compliance with personal data protection are performed on a regular basis and in a structured way. Pointsharp has established routines, using an external party (IT-Säkerhetsbolaget), which performs thorough independent and regular evaluations of Pointsharp's compliance with the GDPR.

3.4.4 Changes to this privacy notice

Pointsharp reserves the right to modify our privacy practices and update and make changes to this privacy notice at any time. For this reason, we encourage you to reread this privacy notice regularly. This privacy notice is current as of the date which appears at the top of the document. We will handle your personal data in a manner consistent with the privacy notice under which it was collected, unless we have your consent to handle it differently.

This privacy notice was last updated: April 17, 2023.