

A+X CREATIVE STUDIO AB "A+X"

PRIVACY POLICY

SUMMARY

General

Your privacy is very important for us at A+X. Our aim is that you shall understand that we respect your right to privacy when we process your personal data. Therefore, we ensure that applicable law regarding data privacy is complied with when we process your personal data in our capacity as data controller.

Material scope

This Privacy Policy applies to A+X processing of personal data within our business in relation to you as an employee, client, supplier or when you visit our website or events.

Collected personal data

The information we collect about you is mainly the information that you provide us with. This information is mainly contact and invoicing information. In order for us to improve our web and application services, we use cookies that may contain personal data. We only use cookies to gather basic data about how our services are being used to monitor and improve usability. We will only process your Personal Data for as long as necessary for the stated purposes and delete it afterward.

Our use and sharing of your personal data

At A+X we use your personal data to:

- Administer and carry out our obligations towards you.
- Comply with our legal obligations.
- Safeguard our legal interests,
- Develop and improve our services,

We do not use your personal data for any other incompatible purpose and we only keep your personal data for as long as necessary. In some cases we may share your personal data with our IT services providers and external consultants which may only process your personal data in accordance with our instructions. We will not sell your personal data to any third party.

Your rights

You have the right to receive information on which personal data we process about you and what we do with the data. You also have the right to a certain degree of control over your personal data. Therefore, in certain cases you have the right to receive your personal data, to have inaccurate data rectified or erased and request restriction of our processing. Furthermore, you have the right to object to the processing of your personal data. If you experience that we process your personal data in an unauthorized manner, you always are entitled to lodge a complaint with the data protection authority. If you want to read more about your rights, please read the full length version of our Privacy Policy.

Contact details

If you have any questions regarding this Privacy Policy, our processing of your personal data, or if you want to exercise your rights, you may contact us in any of the following ways:

A+X Creative Studio AB reg. no. 556597-3145

Postal address: Bondegatan 28, Stockholm

Email: hello@aplusx.se

Telephone: +46(0) 8 587 08 000

PRIVACY POLICY

1. GENERAL

1.1 A+X Creative Studio AB, reg no. 5565597-3145) respects and cares about your personal integrity. We want you to feel safe when we process your personal data. By way of this privacy policy ("Privacy Policy"), we want to inform you about how we ensure that your personal data is processed in the right way.

1.2 This Privacy Policy applies to you when you use or intend to use our services as a client, provide us with services as a supplier, are a guest on our premises or events, seek employment or are employed.

2. DATA CONTROLLER

A+X is the data controller for the processing of your personal data and is responsible for ensuring that the processing is made in compliance with applicable law. You find our contact details at the last page of this Privacy Policy.

3. OUR PROCESSING OF YOUR PERSONAL DATA

3.1 At A+X we use your personal data to:

- Administer and carry out our obligations towards you.
- Comply with our legal obligations.
- Safeguard our legal interests.
- Market, develop and improve our services

<p>Purpose: Administer and carry out our obligations towards you, comply with our legal obligations and safeguard our legal interests in case of a dispute.</p>		
<p style="text-align: center;">Personal data:</p> <p style="text-align: center;"><u>Contact information</u> such as name, phone number, address, email address, position and company name. <u>Orders and payment information</u> from clients and suppliers. <u>Bank information</u> from employees. <u>Personal number & next of kin</u> from employees <u>Personal photographs</u> of employees.</p>		
<p>What we do: We use your contact information to be able to administer and provide you with our services and support. We use your order information, payment information and bank details to carry out our obligations towards you such as payment of salaries and invoices. Employee personal number is used to fulfill our legal obligations regarding taxes and financial information. Information about employees next of kin is used for emergency situations. Personal photographs of employees are used on the website for identification purposes for our clients.</p> <p>In case of a dispute regarding e.g. payment, we are entitled to process your personal data to establish, exercise or defend the legal claim.</p>	<p>Legal basis: Performance of a contract and legal obligations. In case the personal data relates to an affiliate of our client, such as an employee, we base our processing on a legitimate interest. For photographs of employees and information about their next of kin we base our processing on legitimate interest. Should a dispute arise, we are entitled to process your personal data with legitimate interest as legal basis.</p>	<p>Retention period: Your personal data is kept during the entire contract period and 12 months thereafter. We may keep your personal data for a longer time period to comply with our legal obligations regarding financial information or to establish, exercise or defend, a legal claim in case of a dispute regarding e.g. payment.</p>
<p>Your rights: You have the right to object to processing of your personal data based upon a legitimate interest as legal basis. If you object to such processing, we will continue with the processing only if there is a compelling legitimate basis for the processing that outweighs your interest, fundamental rights or freedoms. Please see section 9 if you want to read more about your rights.</p>		

Purpose: Market, develop and improve our services.

Personal data:

Contact information such as name and email address.

User patterns such as information about how you use our services

Browsing habits and web browsing history such as which of our web pages you have visited and for how long.

Health related details such as allergies and intolerances when visiting our premises for events and/or meetings.

Photographs of you from our events.

What we do: When you visit our website we use your personal data to improve our support or adjust our webpage in accordance with yours and others' requests.

We may use health related details about you to organize our events and meetings in a way that suits all participants. We may publish photos of our events on our website and social media channels for marketing purposes. When you accept an invitation to one of our events, we will ask you for your consent to publish photographs.

Legal basis:

Legitimate interest, as we assess that our interest of analyzing your use of our services with the aim of improving, replacing or developing our services overrides your interest of protection of your privacy. For photographs we base our processing on your consent.

Retention period:

Your personal data is kept during the entire contract period and 12 months thereafter.

Your rights: You have the right to object to processing of your personal data based upon a legitimate interest as legal basis. If you object to such processing, we will continue with the processing only if there is a compelling legitimate basis for the processing that outweighs your interest, fundamental rights or freedoms. Please see section 9 if you want to read more about your rights.

4. WHERE WE COLLECT YOUR PERSONAL DATA FROM

4.1 The personal data we process about you is the information you have provided us with. You provide us with information such as your name, address, email address, and work place in connection with our services and employment. We do not obtain any information from other sources.

4.2 To be able to register you and to enable us to provide you with our services, you must provide us with this personal data. If you do not provide us with this information that we need, we unfortunately cannot provide you with our services as a business partner or employer.

5. AUTOMATED DECISION-MAKING

We do not use any automated decision-making which has significant effects on you.

6. FOR HOW LONG TIME DO WE KEEP YOUR PERSONAL DATA?

6.1 We only keep your personal data for as long time as necessary to achieve the purposes for which they were collected in accordance with this Privacy Policy. When we do not longer need your personal data, we remove the data from our systems, databases and backups. In the tables above under section, you may read more information about for how long time we keep your personal data for different purposes.

6.2 We may be required to keep your personal data for other reasons, such as to comply with legal obligations or to safeguard our legal interest.

7. WITH WHOM DO WE SHARE YOUR PERSONAL DATA WITH?

7.1 A+X may share your personal data with third parties such as our IT service and software providers and external consultants which we cooperate with to provide our services. These IT service and software providers and external consultants may only process your personal data in accordance with our instructions. We may also in certain cases be required to share your personal data with public authorities or other third parties in connection with court proceedings, corporate acquisitions or similar reasons.

7.2 We will not sell your personal data to any third party.

8. WHERE DO WE PROCESS YOUR PERSONAL DATA?

8.1 A+X strives for only processing your personal data within the EU/EEA. In some cases, we may transfer your personal data to a country outside of the EU/EEA. If personal data is transferred to any such country, we will ensure that your personal data is protected and that the transfer is carried out in accordance with applicable law.

8.2 When carrying out any transfer to a country that lacks an adequacy decision by the European Commission, we will use the standard contractual clauses issued by the European Commission as legal basis for the transfer. You find these here: http://ec.europa.eu/justice/data-protection/internationaltransfers/transfer/index_en.htm.

8.3 When carrying out transfers to recipients in the United States that have joined the Privacy Shield program, we use the Privacy Shield as legal basis for the transfer, which you find here: http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2016.207.01.0001.01.ENG&toc=OJ:L:2016:2

9. YOUR RIGHTS

9.1 Our responsibility for your rights

9.1.1 A+X acts as the data controller responsible for ensuring that your personal data is processed in accordance with applicable law and that your rights have an impact on the processing. You may at any time contact us to exercise your rights. You find our contact details at the last page of this Privacy Policy.

9.1.2 A+X is responsible for answering your request to exercise your rights within one month from our receipt of your request. If your request is complicated, or if we have received a large extent of requests, we are entitled to prolong our response period with two additional months. If we assess that we cannot perform the actions you have requested, we will within one month explain why and inform you about your right to lodge a complaint with the data protection authority.

9.1.3 All information and communication, and all actions we carry out, is at no cost for you. If the action you request is manifestly unfounded or excessive, we are entitled to charge you an administrative fee to provide you with the requested information or carry out the requested action or refuse to meet your request.

9.2 Your right to access, rectification and erasure of personal data and restriction of processing

9.2.1 You have the right to request:

- a) Access to your personal data. This means that you have the right to request an abstract from our data record regarding our use of your personal data. You also have the right to request a copy of the personal information being processed at no cost. However, we may charge you a reasonable administrative fee to provide you with additional copies of the personal data. If you make your access request by electronic means such as email, we will provide you with the information in a commonly used electronic format.
- b) Rectification of your personal data. We will at your request, or at our own initiative, rectify, anonymize, erase or complement personal data that you or we discover is inaccurate, incomplete or misleading. You also have the right to complement the personal data with additional data if relevant information is missing.
- c) Erasure of your personal data. You have the right to request that we erase your personal data if we do no longer have an acceptable reason for processing the data. Given this, erasure shall be made by us if:
 - (i) the personal data is no longer necessary for the purposes for which it was collected,
 - (ii) you object to the processing of your personal data based on our legitimate interest and there is no overriding legitimate ground for the processing,
 - (iii) the personal data has not been lawfully processed,
 - (iv) we are required to erase the personal data due to a legal obligation, or
 - (v) you are a child and we have collected the personal data in relation to the offer of information society services.

However, there might be requirements under applicable law, or other weighty reasons, that entail in that we cannot immediately erase your personal data. In such case, we will stop using your personal data for any other reasons than to comply with the applicable law, or the relevant weighty reason.

d) Right to restrict processing: This means that we temporarily restrict the processing of your personal data. You have the right to request restriction of the processing when:

- (i) you have requested rectification of your personal data in accordance with section 9.2.1 b) above during the time period we are verifying the accuracy of the data,
- (ii) the processing is unlawful and you do not want the personal data to be erased,
- (iii) A+X , in its capacity as data controller, does no longer need the personal data for the purposes for which it was processed, but you require us to retain the information for the establishment, exercise or defense of legal claims, or
- (iv) you have objected to our legitimate interest for the processing in accordance with section 9.3 below during the time period we determine whether the legitimate interest overrides your privacy rights.

9.2.2 At A+X, we will take all reasonable and possible actions to notify any recipients of your personal data as set out in section 7 above regarding any rectification, erasure or restrictions carried out by us. At your request, we will also inform you of which third parties we have shared your personal data with.

9.3 Your right to object to the processing

You have the right to object to such processing of your personal data based upon our legitimate interest (please see section 3 above). If you object to such processing, we will only continue with the processing if we have a compelling legitimate reason for the processing that outweighs your interest, rights or freedoms, or unless continued processing is necessary for the establishment, exercise or defense of a legal claim.

9.4 Your right to portability

You have the right to portability. This means that you have the right to receive certain of your personal data in a structured, commonly used and machine readable format and have the right to transmit those data to another controller. You only have this right when your personal data is processed by automated means and our legal basis for the processing is performance of a contract between you and A+X. This means e.g. that you have the right to receive and transfer all of the personal data that you have provided us.

9.5 Your right to lodge a complaint with the data protection authority

You have the right to lodge any complaints regarding our processing of your personal data with the data protection authority.

10. WE PROTECT YOUR PERSONAL DATA

You shall always feel safe when providing us with your personal data. Therefore, A+X has implemented appropriate security measures to protect your personal data against unauthorized access, alteration and erasure. In the case of a security breach that may significantly affect you or your personal data, e.g. when there is a risk of fraud or identity theft, we will contact you and inform you of what you can do to reduce this risk.

11. COOKIES

At A+X, we use cookies at our webpage and in our services to improve your user experience. We use cookies to e.g. simplify and adjust our web and application services. We only use cookies to gather basic data about how our services are being used to monitor and improve usability. We do not process any personal data and we do not keep any personal data after 12 months. You may opt out from using cookies by disabling them in your web browser or by not accepting the cookie consent message on our webpage. You may also contact us for more information.

12. AMENDMENTS TO THIS PRIVACY POLICY

A+X has the right to amend this Privacy Policy at any time. When we make any amendments that are not only linguistic or editorial, you will be provided with clear information of the amendments and which impact they will have on you before the amendments are effective.

13. CONTACT INFORMATION

Do not hesitate to contact us at A+X, if you have any questions regarding this Privacy Policy, our processing of your personal data, or if you want to exercise your rights.

Postal address: Bondegatan 28, 116 33 Stockholm

Email: hello@aplusx.se

Telephone: +46(0)8 587 08 000

Webpage: www.aplusx.se