

## **PRIVACY POLICY – processing of personal data**

Speaser AB respects your right to privacy.

Speaser AB, Reg. No 556857-7216, and address Tors väg 5 B, 754 40 Uppsala is as personal data controller responsible for processing of your personal data in accordance with this Privacy Policy.

This Privacy Policy sets out how Speaser AB, collects, uses and shares personal data that we obtain as a result of your use of the Speaser application, <http://www.speaser.com>, our other applications and tools, and any related services (collectively the "Services").

You should be able to feel secure when entrusting your personal data to us. For this reason, we have drawn up this policy. It is based on current data protection legislation and clarifies how we work to safeguard your rights and privacy.

You can only use our Services in accordance with our Terms of Service (<http://www.speaser.com>)

### **1. Your Personal Data and why we process it**

Speaser's website and mobile applications are services for sport- and betting interested people. In order to provide these Services we may process and store personal data about you. The type of personal data we may collect includes name, username, password, email address, telephone number, address, location data, payment information (from Google and Apple). We may also process personal data that you as a user generate yourself, such as photos and videos. We may also collect information such as which pages of our Services that you visit, the time and date of your visit, the time spent on those pages and other statistics.

Any personal data processed and/or stored by us is used to provide the Services and improve our Services, develop new products and Services, conduct statistical analysis, provide information to research partners, analyse your use and personalise the Services. We may also use your personal data to contact you with newsletters, marketing or promotional materials and other information that we believe that you could be interested in.

### **2. Where do we process your personal data?**

Our intention is to only process your personal data within the European Union and the European Economic Area. If any of your personal data will be transferred outside this area, such transferring and processing will only be done by observing applicable privacy regulations and ensuring your privacy rights are protected.

### **3. Who do we share your personal data with?**

We may share your personal data with service providers (for example our personal data assistants) to perform functions and process user data and to help provide our Services, so that we can meet our obligations in relation to you as a user. Your personal data will be hosted by a third party in accordance with this Privacy Policy.

Where a third party processes personal data on our behalf, it is subject to security and confidentiality obligations consistent with this Privacy Policy and applicable data protection legislation.

We may also share your personal data with third parties, if we would sell or buy any business or assets.

We may also disclose your personal data to authorities or other officials in order to comply with regulations, laws or any authority requests. We may also need to disclose your data if it is necessary to exercise, establish or monitor our legal claims.

#### **4. On what legal basis do we process your personal data?**

We only process such personal data that we need to enable us to perform and deliver our Services to you, i.e. when you enter into an agreement with us, i.e. when you accept our Terms of Service. To the extent that we process further personal data, we will obtain your consent or ensure that processing is authorised on a different legal basis.

#### **5. Your rights**

When we process personal data about you, you as registered have a number of rights. You have the right to contact us at any time with respect to these, and if you wish to exercise any of the rights described below, you can reach us most easily at [support@speaser.com](mailto:support@speaser.com).

We reserve the right to take appropriate protective and security measures in order to ensure that you are the person you claim to be when you contact us. If you cannot satisfactorily demonstrate your identity, we may not be able to respond to your request.

##### *Access to personal data*

You have the right to know what personal data we process about you. If you wish to know, you can get a compiled register extract from us that contains all the personal data we process about you.

##### *Correction and deletion*

If we process your personal data incorrectly or if we no longer need the data, you are entitled to have it deleted. If the data is incomplete, you have the right to have it supplemented. Please keep in mind that we may not be able to provide you with our Services if you request to have your personal data deleted.

##### *Data portability*

You have the right to receive the data that we process about you in a general, written, machine-readable and structured format. You have the right to do so for the personal data that you have provided to us and which we process with your consent or when the personal data is required to enter into or complete an agreement.

##### *Restrictions to processing*

Under certain conditions, you have the right to request that we restrict our processing of your data. This means that we mark the data so that in future we only process it for certain specific purposes. We may not be able to provide you with our Services if we restrict the processing of your personal data.

##### *Right to make objections*

You have the right to object to the processing of personal data that is carried out to perform a task in the public interest, as part of an exercise by a public authority or after a balance of interests. We do not process your personal data for any of these purposes or on any of these grounds. Therefore, you cannot direct any objections towards our processing on this basis.

##### *Right to lodge a complaint*

You have the right to lodge a complaint with the Swedish Data Protection Authority if you believe that we are processing your personal data in an inappropriate manner. You can read more about this on the Swedish Data Protection Authority's website [www.datainspektionen.se](http://www.datainspektionen.se).

*Additional comments:*

Please notice that it could be situations where we cannot delete or correct all personal data at your request if we need to retain some or all of such personal data for other legal purposes such as maintaining financial records, protecting or enforcing legal rights, or for technical reasons such as maintaining our database integrity.

Withdrawal of consent: If you have consented to receive direct marketing communications from us, and you want to stop receiving such communication, you can click on the opt out link in the marketing communication sent or contact us at [support@speaser.com](mailto:support@speaser.com).

## **6. Security**

The safety and security of your personal data is important to us, but please remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. We will use commercially reasonable efforts to safeguard the confidentiality of your personal data. However, we can not be held liable for any loss of or disclosure of data or any losses or damages incurred due to errors in transmission or unauthorized or unlawful acts of third parties or your decision to disclose your personal data.

## **7. For how long do we process your personal data?**

We process and retain personal data about you as a user for the duration of your use of any of our Services and for twelve (12) months after your last use of any Service. Thereafter we delete all your personal data after asking you if you want to close your account. If you do not want us to close your account, we will let it remain undeleted for another twelve (12) months.

Please note that we may be forced to continue to process your personal data for a longer period of time. This applies, for example, when required by law or when the data may be needed to establish, exercise and monitor legal claims.

## **8. Cookies**

By using the Services you agree to our use of cookies on the Services. Cookies are small text files that websites send to your computer to uniquely identify your browser or to store data or settings in your browser.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. Please note, however, that without cookies you may not be able to use all of the features of the Services.

We also use Google Analytics to collect visitor statistics.

## **9. Amendments to this Privacy Policy**

This Privacy Policy is effective as of 1 September 2019 and will remain in effect except with respect to any amendments in its provisions in the future, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgement of the modifications and your consent to abide and be bound by the modified Privacy Policy.

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us with, or by placing a prominent notice on our website.

## **10. Contact us**

If you want to contact us about any of the matters in relation to this Privacy Policy, please email [support@speaser.com](mailto:support@speaser.com).