



PRIVACY NOTICE FOR CUSTOMERS

1. INTRODUCTION

PURPOSE

At Innit Audio, we take data privacy and protection seriously. We want to inspire trust and confidence in the way we handle all personal data, but especially that of our employees. Therefore, we want to provide you with a clear understanding of how we collect, use, and protect your data in accordance with the General Data Protection Regulation (GDPR) at its UK equivalent, the new Swiss Federal Act on Data Protection (nFADP), and U.S. privacy legislation, including the California Consumer Privacy Act (CCPA).

OVERVIEW OF PRIVACY NOTICE

This table of information describes which of your personal data we process when you are a customer of Innit Audio and use our services and application. More detailed information is found underneath this overview.

<i>Categories of personal data</i>	<i>Purpose of Processing</i>	<i>Legal Ground for Processing</i>	<i>Source of Personal Data</i>	<i>Retention time</i>	<i>Transfer to third parties?</i>
Identifying information	1	Contractual obligation	From you	5 years after deactivation of account	Hubspot Zendesk Firestore Stripe
	2				
	3	Legitimate interest			
	4	Legal obligation			
	5				
	6				
Contact information	1	Contractual obligation	From you	5 years after deactivation of account	Hubspot Zendesk Firestore Stripe
	2				
	3	Legitimate interest			
	4	Legal obligation			
	5				
	6				
Online identifying	1	Legitimate interest	Device collection	5 years after deactivation of account	Cryptlex Firestore
	2				

	6		App collection		
Usage information	1 6	Legitimate interest	Device collection App collection	5 years after deactivation of account	Cryptlex Firestore
Financial Information	1 2 5	Contractual obligation Legal obligation	From you	7 years after end of year payment was made	Stripe Firestore
Personal data included in communications	1 3 6	Legitimate interest	From you	As long as required, depending on topic of communication	Lumoa Zendesk

2. DATA COLLECTION & PROCESSING

PURPOSES OF DATA PROCESSING

We process your personal data for various purposes, including:

1. To provide the Innit Audio services to you.
2. For business administration purposes and in order to administrate your account.
3. To communicate with you.
4. For marketing purposes.
5. To comply with legal obligations we may have, relating to e.g. bookkeeping and taxation.
6. To know how you use our Innit App and service.

WHAT DATA IS COLLECTED

We collect and process the following personal data about you:

- **Identifying information** (e.g. your name, user account information).
- **Contact information** (e.g. your email address).
- **Online identifying information** (e.g. your IP address, language settings, geo location, browser information, device information).
- **Usage information** (e.g. session time, application usage events, Innit App version)
- **Financial information** (e.g. account or payment information).
- **Any personal data included in communications between you and us** (e.g. if you write us a message in a customer support matter which includes personal data).

HOW DATA IS COLLECTED

- **From you:** i.e. collected from you as you provide it when signing up for our service or when you contact us in relation to e.g. customer support matters.

- **Device collection:** i.e. data collected from your device when you use our service or visit our website.
- **App collection:** i.e. data collected from our Innit App and the underlying technology of said app.

LEGAL BASIS FOR PROCESSING DATA

We only process data where there is a legal basis to do so, as described hereinunder.

- **Contractual obligation:** when it is necessary to process personal data in order to perform and administrate our contractual obligations towards you as an Innit Audio customer.

This is the legal basis for:

- our processing of your *identifying information, contact information, and financial information* for purposes no. **1** and **2**, and
- our processing of your *identifying information, contact information, and financial information* for purpose no. **5**.

- **Legitimate interest:** when the processing is necessary to fulfil a legitimate interest of Innit Audio.

This is the legal basis for:

- our processing *identifying information, contact information, and any personal data included in communications* for purposes no. **3** and **4** is based on our legitimate interest of communicating with you in relation to our provision of product or service to you, handling customer service, customer experience, and feedback matters, as well as to promote our service and company; and
- our processing of *online identifying information, usage information and any personal data included in communications* for purpose no. **6** on our legitimate interest of assessing, analyzing, and improving our service, app, and the user experience.

- **Legal obligation:** when the processing is necessary in order to comply with legal obligations which we have.

This is the legal basis for:

- our processing of your *identifying information and financial information* for purpose no. **5**.

3. USE OF DATA

HOW DATA IS USED

We use your personal data in the course of business, to fulfill our obligations to you as a service provider you have bought services from, and to promote and develop our business and service.

SHARING OF DATA WITH THIRD PARTIES

We share information with our suppliers as well as affiliate companies to the extent this is necessary to administrate your account and our business operations. Where there is a transfer of

personal data to such third party, Innit Audio uses Data Processing Agreements and thereto related instructions in order to regulate how that third party may process your data.

When you are a customer of ours, we may share your personal data with the following third parties:

- **Hubspot**
Hubspot is our CRM system, in which we administrate our customer relationships. In these operations, we may share *contact information* and *identifying information* about you for the purposes no. **2**, **3**, and **4** with Hubspot.
- **Zendesk**
Zendesk is our system for administrating customer service. In customer service operations, we may share *contact information*, *identifying information* and *any personal data included in communications* about you for the purposes no. **2**, **3**, and **4** with Zendesk.
- **Lumoa**
Lumoa is our customer feedback system. In relation to administrating customer feedback, we may *any personal data included in communications* about you for the purposes no. **3** and **6** with Lumoa.
- **Firestore**
Firestore is the database we use for the handling, administration, and organization of customer account information. In these operations, we may share *contact information*, *identifying information*, *online identifying information*, *usage information*, and *financial information* about you for the purposes no. **1**, **2**, and **6** with Firestore.
- **Cryptlex**
Cryptlex is the software partner we use for the handling of licenses. We may share *online identifying information* and *usage information* about you for the purposes no. **1**, **2**, and **6** with Cryptlex.
- **Stripe**
Stripe is a payment solution which we use for the organization and administration of payments for customers within the EU. We may share *identifying information*, *contact information*, and *financial information* about you for the purposes no. **1**, **2**, and **5** with Stripe.

INTERNATIONAL DATA TRANSFERS

We are a Swedish company and process your data in European Union. We will only transfer data to third parties outside of the EU where necessary. Where a transfer of personal data outside the European Union or the European Economic Area is needed, this will be done in accordance with data protection legislation and the limits set therein, e.g., by using Standard Contractual Clauses approved by the European Commission and supplemented with additional safeguards as needed. Where data is being transferred outside of the EU/EEA to a country for which there is an adequacy decision made by the European Commission, such decision serves as the lawful basis.

4. SECURITY

MEASURES TAKEN TO PROTECT DATA

We keep and maintain physical, technical, and organizational safeguards to ensure the protection of your personal data.

This includes:

- Keeping, updating, and testing security technology such as firewalls.
- Access controls and permission management.
- Password policies.
- Locked cabinets and rooms.
- Having a designated Data Protection Officer (“DPO”) that is responsible for continuously reviewing and revising the technical and organizational safeguards for the protection of data.
- Restricting access to information to those employees that need to know.
- Aggregating or anonymizing data prior to usage, where appropriate.

RETENTION OF DATA

In general, we will keep your personal data for as long as it is relevant for the purpose it was collected. We will keep your personal data for at least as long as you are subscribing to our service or have an active account.

Further, certain identifying and employment information is kept to fulfill tax, accounting and record-keeping requirements, handle customer complaints, returns, and other administration relating to payments, and for research, development and safety purposes. In addition, the information may be retained for a longer period of time to protect the company's rights, defend against potential claims, and meet legal obligations.

DATA BREACH NOTIFICATION

In case there is a breach of personal data which your personal data is affected, we will notify the personal data breach to the competent supervisory authority (in Sweden, this is *Integritetsskyddsmyndigheten* “IMY”) unless the personal data breach is unlikely to result in a risk to your rights and freedoms.

We will also, where we consider the breach is likely to result in a high risk to your rights and freedoms, inform you of the personal data breach in accordance with GDPR art. 34.

5. RIGHTS OF DATA SUBJECT

As a customer, you have certain rights relating to how we process your data. Which legislation applies to you depends on various factors, such as of which country you are a citizen or where you are a resident. Because we take privacy very seriously, we have modelled our data protection policy to fulfil requirements of some of the strictest data protection legislative acts in the world. This includes the GDPR, UK GDPR, the Swiss nFADP, and the CCAP. According to the aforementioned laws and regulations, you as a customer may have the following rights:

RIGHTS UNDER THE GDPR AND UK GDPR (EU AND UK CITIZENS AND RESIDENTS)

Right to be informed: You have the right to know what personal data is being collected about you, why it is being collected, and how it will be used. This notice is provided partly in order to fulfil our obligation in respect to this right.

Right of access: You have the right to access your personal data and receive a copy of it. If you want a copy of the personal data we process about you, please contact our DPO.

Right to rectification: You have the right to request that any inaccurate personal data about you is corrected. If you want us to rectify any of the personal data we process about you, please contact our DPO.

Right to erasure: You have the right to have your personal data erased under certain circumstances. If you want us to delete any of the personal data we process about you, please contact our DPO and let us know what data and why.

Right to restrict processing: You have the right to request that the processing of your personal data be restricted under certain circumstances. If you want us to restrict the personal data we process about you, please contact our DPO and let us know what data and why.

Right to data portability: You have the right to receive your personal data in a structured, commonly used, and machine-readable format, and to transmit it to another data controller. If you want to receive a copy of the personal data we process about you or have it transferred to another controller, please contact our DPO.

Right to object: You have the right to object to the processing of your personal data under certain circumstances. If you want to object to our processing of your personal data, please contact our DPO.

Rights related to automated decision making and profiling: You have the right to know when automated decision making and profiling is being used, and to object to it under certain circumstances. Please note that we do not use your personal data for any automated decision making or profiling.

RIGHTS UNDER THE CCPA (US RESIDENTS INCLUDING CALIFORNIA RESIDENTS)

Right to know: You have the right to know what personal information is being collected, sold, or disclosed about you, and to whom. This notice is provided partly in order to fulfil our obligation in respect to this right.

Right to delete: You have the right to request the deletion of your personal information. If you want us to delete any of the personal data we process about you, please contact our DPO and let us know what data and why.

Right to opt-out: You have the right to opt-out of the sale or sharing of your personal information for the purpose of behavioral advertising. As a rule, we do not sell personal information behavioral advertising purposes.

Right to non-discrimination: You have the right not to be discriminated against for exercising your CCPA rights. We do not and will not discriminate against any of our customers.

Right to correction: You have the right to correct inaccurate personal information that we have about you. If you want us to rectify any of the personal data we process about you, please contact our DPO.

Right to limitation: You have the right to limit the use and disclosure of sensitive personal information collected about you. We normally do not process any sensitive personal information about you. Should you nevertheless want to exercise this right, please contact our DPO.

RIGHTS UNDER THE NFADP (SWISS CITIZENS)

Right to be informed: You have the right to know what personal data is being processed about you, why it is being processed, and to whom it is being disclosed. This notice is provided partly in order to fulfil our obligation in respect to this right.

Right to access: You have the right to access your personal data and receive a copy of it, as well as other information relating to the processing of your personal data, such as the purpose of processing and where the data was obtained from. If you want a copy of the personal data we process about you, please contact our DPO.

Right to deletion: You have the right to request the deletion of your personal data under certain circumstances. If you want us to delete any of the personal data we process about you, please contact our DPO and let us know what data and why.

Right to correction: You have the right to have any inaccurate personal data about you corrected. If you want us to rectify any of the personal data we process about you, please contact our DPO.

Right to object: You have the right to object to the processing of your personal data under certain circumstances, such as when the processing is for direct marketing purposes. If you want to object to our processing of your personal data, please contact our DPO.

Right to data portability: You have the right, under certain circumstances, to receive a copy of the personal data relating to you in a commonly used format, or to ask that the personal data be transferred from us to another controller. Please contact our DPO if you want to exercise this right.

Right not to be subject to automated decision-making: You have the right to be informed by controllers if automated individual decision-making is used. Additionally, you have the right to be heard in the case of automated individual decision-making. Please note that Innit Audio does not use your personal data for any automated decision making or profiling.

CONFIRMATION OF IDENTITY

If you contact us and we have any doubts regarding your identity, we have an obligation under law to request more information from you in order to establish your identity so that we are able to handle your request. This may for example be an ID or digital identification.

PROCESSING TIMES

We will handle a request in which you exercise your rights without undue delay, but no later than one (1) month from the point when we have received your request. This period can, in some cases, be extended by up to an additional two (2) months depending on the complexity of your request, as well as the number of requests we receive during this time.

REQUEST

If you want to receive information about what personal data we process about you, please contact us, using the details at the bottom of this notice.

You also have the right to file a complaint with the supervisory authority if you believe we are mishandling your request. See contact details to the Swedish IMY hereinunder.

SWEDISH SUPERVISORY AUTHORITY INFORMATION

Integritetsskyddsmyndigheten, Swedish Authority for Privacy Protection (IMY)

Telephone number: +46 8 657 61 00

Address: Box 8114, 104 20 Stockholm, Sweden

Webpage: <https://www.imy.se/>

6. CHANGES TO THIS PRIVACY NOTICE

We may introduce changes or updates to this Privacy Notice from time to time. In such case, we will publish information on the changes or updates on our website. We therefore recommend that you revisit this Notice from time to time to ensure that you are updated with the latest information. If we make changes that are not strictly editorial but have significant effect, we will inform you about this appropriately.



Contact Information

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