Privacy Policy

Infonomy AB

Last updated: October 20, 2022

Infonomy AB is committed to respecting and protecting your privacy. We aim to do this in compliance with data protection principles. This Privacy Policy describes Infonomy AB's (the "**Company**") policies and procedures on the collection, use and disclosure of your information when you use our devices and/or services.

Collecting Your Personal Information

Types of Data Collected

While using our devices and/or services, we may ask you to provide us with, or we may obtain, certain Personal information that can be used to contact or identify you. Personal information may include, but is not limited to:

Data Provided by You

While using our devices and/or services, we may ask you to provide us with certain information that can be used to contact or identify you. This information may include, but is not limited to your Email address.

Usage Data

Usage Data is collected automatically when using our devices and/or services.

Usage Data may include information such as your device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our services that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access the services by or through a mobile device, we may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

We may also collect information that your browser sends whenever you visit our services or when you access the devices and/or services by or through a mobile device.

Information Collected while Using the Infonomy service

In order to provide the functionality offered by the Infonomy service, we may collect – with your prior permission – information, which includes but is not limited to:

- Mac-addresses of the Wearables and Gateways
- Bluetooth signal strengths
- Timezone
- IP addresses
- Internet quality measurements such as latency, packet loss, etc.
- WiFi signal strength
- Hardware performance statistics
- Battery charge levels

Use and Sharing of Your Personal Information

We may use Personal information for the following purposes:

- **To provide and maintain our Services**, including to monitor the usage of our Services.
- **To manage your account:** to manage your registration as a user of the services. The Personal information you provide can give you access to different functionalities of the services that are available to you as a registered user.
- **For the performance of a contract:** the development, compliance and undertaking of the purchase contract for the products, items or services you have purchased or of any other contract with us through the services.
- **To contact you:** to contact you by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- **To manage your requests:** to attend and manage your requests to us.
- **For other purposes**: we may use your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our products, services, marketing and your experience.

We may share your personal information in the following situations:

- **With service providers:** we may share your personal information with service providers to monitor and analyze the use of our Services, for payment processing, or to contact you.
- **With your consent**: We may disclose your personal information for any other purpose with your consent.

Retention of Your Personal Information

The Company will retain your Personal information only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain usage data for internal analysis purposes. Usage data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Services, or we are legally obligated to retain this data for longer time periods.

Transfer of Your Personal Information

Your information, including Personal information, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located.

The Company will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal information will take place to an organization or a country unless there are adequate controls in place including the security of your data.

Disclosure of Your Personal Information

Business Transactions

If the Company is involved in a merger, acquisition or asset sale, your Personal information may be transferred. We will provide notice before your Personal information is transferred and becomes subject to a different Privacy Policy.

Law Enforcement

Under certain circumstances, the Company may be required to disclose your Personal information if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Other Legal Requirements

The Company may disclose your Personal information in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

Security of Your Personal Information

The security of your Personal information is important to us, but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal information, we cannot guarantee its absolute security.

GDPR Privacy

Legal Basis for Processing Personal information under GDPR

We may process any of the Personal information we collect using one of the following lawful bases:

- **Consent:** you have given your consent for processing Personal information for one or more specific purposes.
- **Performance of a contract:** provision of Personal information is necessary for the performance of an agreement with you and/or for any pre-contractual obligations thereof.
- **Legal obligations:** processing Personal information is necessary for compliance with a legal obligation to which the Company is subject.
- **Vital interests:** processing Personal information is necessary in order to protect your vital interests or of another natural person.
- **Public interests:** processing Personal information is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Company.
- **Legitimate interests:** processing Personal information is necessary for the purposes of the legitimate interests pursued by the Company.

In any case, the Company will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal information is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Your Rights under the GDPR

The Company undertakes to respect the confidentiality of your Personal information and to guarantee you can exercise your rights.

You have the right under this Privacy Policy, and by law if you are within the EU, to:

- **Request access to your Personal information.** The right to access, update or delete the information we have on you. Whenever made possible, you can access, update or request deletion of your Personal information directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you. This also enables you to receive a copy of the Personal information we hold about you.
- **Request correction of the Personal information that we hold about you.** You have the right to have any incomplete or inaccurate information we hold about you corrected.
- **Object to processing of your Personal information.** This right exists where we are relying on a legitimate interest as the legal basis for our processing and there is something about your particular situation, which makes you want to object to our processing of your Personal information on this ground. You also have the right to object where we are processing your Personal information for direct marketing purposes.
- **Request erasure of your Personal information.** You have the right to ask us to delete or remove Personal information when there is no good reason for us to continue processing it.
- **Request the transfer of your Personal information.** We will provide to you, or to a third-party you have chosen, your Personal information. Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw your consent.** You have the right to withdraw your consent on using your Personal information. If you withdraw your consent, we may not be able to provide you with access to certain specific functionalities of the Services.

Exercising Your GDPR Data Protection Rights

You may exercise your rights of access, rectification, cancellation and opposition by contacting us. Please note that we may ask you to verify your identity before responding to such requests. If you make a request, we will try our best to respond to you as soon as possible.

Changes to this Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new privacy policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the “Last updated” date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Making a Request to Exercise Your Rights

Contact

Please contact us if you have questions or wish to take any action with respect to information to which this privacy policy applies.

Email: info@infonomy.com

Telephone: +46 (0) 708774807

Submitting requests

You may submit a request to exercise your rights by making a request using the contact information above.