

Data Protection

Data Protection Policy for *Close Talk Conference System* c/o Apodosis AB

Close Talk Conference System c/o Apodosis AB, hereafter referred to as *CTCS*, strives for full confidentiality of all matters involving personal data. The following policy describes how personal data is managed in the daily operation. Note that this policy does not include internal matters such as staff.

What personal data does CTCS collect?

CTCS register information that may contain personal data within the following areas in our operation:

- Marketing of our products and services (customer and contact register)
- Suppliers of material (suppliers register)
- Suppliers of services (suppliers register)

Within all areas the primary purpose is to register contact information to *businesses*. A business contact usually contains one or more *contact persons* where name, role within the company and contact methods (e-mail, telephone, fax, etc.) may be registered. CTCS generally considers all information *actively provided* to us as consent to register. Actively providing includes but is not limited to e-mail signatures, business cards, website contact information or by other means where the contact has provided such information through:

- Transaction, invoicing and/or shipping information through purchasing and/or selling by CTCS or agreements for any of our solutions or services
- Registering an interaction with CTCS such as sending feedback, asking for support, reporting a problem or by any other means contacting us
- Responding to a survey
- Interaction with a sales representative, for example at a trade show counter or in show rooms
- We may also register certain information about the usage of our web services, for example the origin of a web visit, clicked links, products in search results, products ordered and requested information. E-mail messages reception status may also be registered

Under no circumstances will CTCS register any personal data of a private nature such as home address, marital status, private preferences or similar. No personal reviews other than business related may be registered.

How is CTCS using the personal data?

Depending on how our web services are used, the type of interactions with us and the level of consent the personal data is used for:

- To complete purchase orders and/or to supply services agreed upon
- To maintain a business contact
- To manage possible questions and complaints
- To adapt pre- and post market activities based on account information, purchase history and web activity
- To improve and maintain our web services and monitor its usage

- For marketing surveys, we may for example make contact for feedback about products and services
- For marketing purposes within the level of consent
- For security reasons, to investigate possible fraud and when it is necessary to protect our self and third parties
- To follow domestic and foreign laws and regulations

We are basing this policy on the following legal grounds, within the legislation governing data protection, when we manage personal data:

- The management is necessary to complete an agreement or for preparations to complete an agreement
- Because it is a legitimate interest of CTCS and the contact during selling and/or purchasing activities
- Because we have been given consent
- Because it is a legitimate interest of CTCS as a supplier to establish and maintain marketing contacts for our products and as a purchaser to maintain the contact with our suppliers

Who is CTCS sharing personal data with?

CTCS views customer, contact and supplier data as a vital part of our operation and as such, only for use within the same. Under no circumstances will we sell, share or distribute personal data as a product or service of its own.

However, the daily operation may require use to share certain parts of information:

Marketing: From time to time we may share contact information with other contacts, for example as a referral if we are contacted from a region where we already have an established business partner

Service suppliers: Third parties involved in the chain of shipping (for example mail and shipping companies). We may also share information with professional and legal advisors

Governmental authorities: As required by law we may be required to share information with customs and other authorities in both the country of origin and destination country. We may also be required to share information to crime prevention or other authorities to report a possible crime or as a legal requirement

Credit and fraud prevention: We may share information with credit rating agencies and other third parties for the prevention and tracking of fraud

Selling of company or company assets: In the event of selling the company or assets, our personal data registers may be included to a potential customer. In such event we will do everything possible to transfer this policy to the buyer

CTCS may also share information in cases where we consider it necessary to protect CTCS, our customers, employees or the public's rights, property or personal safety or by other means when we have a legal right to do so.

Where and for how long will CTCS store personal data?

All registers are stored internally within the company.

We keep personal data for as long as required according to the terms listed in this policy so the actual time depends on the type of interaction with CTCS. In general, all information and all data with the purpose of preparing for, executing and managing purchases and sales

including aftermarket support are considered legal documents, vital for the daily operation and will be stored for as long as is deemed necessary to protect us from legal action.

As soon as we no longer have a need for certain information we will delete it. Please note that when unsubscribing to our newsletter we will keep a record of the related e-mail address to ensure that the recipient will remain unsubscribed in the future.

How is CTCS protecting the personal data?

CTCS will always strive to deliver service and safety on the highest level to our contacts. To ensure the safety and protection of personal data we only store the information in-house, no third party service providers have access to personal data.

How is CTCS using personal data for marketing?

The suppliers register is only used internally for daily operations, not for marketing.

The customer and contact register is used for:

- Newsletters via e-mail. The newsletter always contains a link to deregister from the newsletter mailing list
- Analyzing contact and marketing reach
- Contact history
- After market support
- References

How do I gain access to, update, correct or remove the personal data?

For any questions regarding the use of personal data, use the contact information below. The data protection law GDPR (General Data Protection Regulation) provides rights to access (including a machine readable format), correct and request removal of personal data. CTCS will follow any requests for these rights according to applicable laws. However, be aware that there are limits to these rights and there may be circumstances preventing us from completing a request.

Contact us

For questions about the policy please use these e-mail addresses:

info@closetalk.se or info@apodosis.se.

For general information about data protection please contact the local Data Protection Authority.

Policy updates

This policy statement may be updated according to changes in regulations or our own policies. In such an event we will publish an updated policy and act accordingly.

This policy was last updated May 2018.