

PRIVACY POLICY

Policy concerning privacy, marketing and processing of personal data

This policy sets out how ALO Center AB, Corporate Registration Number 556610-7099, Industrivägen 10, 792 32 Mora, email: info@alocenter.se, ("ALO Center ", "we") gather, use, disclose and store your personal data.

Contents

- Purpose of our Privacy Policy
- Why do we process your personal data?
- What personal data do we process?
- For how long do we retain your information?
- How do we gain access to your personal data?
- Legal basis for processing your personal data
- Profiling
- Your rights
- Is your personal data being processed in a safe manner?
- When do we disclose your personal data?
- Cookies
- Personal Data Controller
- Questions?

Purpose of our Privacy Policy

We have drawn up this policy because we care about your privacy. It is based on current personal data protection legislation and clarifies how we work to protect your rights and your privacy.

The purpose of the Policy is for you to know how we process your personal data, what we use it for, who it may be disclosed to and under what circumstances, and how you can protect your rights.

Why do we process your personal data?

We process your personal data primarily to fulfil our obligations in your respect, for example delivering products and/or services that you have ordered. Our basic premise is to not process more personal data than is necessary. For the most part we process your personal data for the purposes of:

- Fulfilling our obligations towards you as a customer, such as carrying through purchases, invoicing and the provision of service and support
- Enabling general customer care and customer service, such as responding to questions
- Marketing ourselves and our products via e-mail, post, telephone and SMS/MMS
- Providing you with relevant information and customized offers in newsletters and on the internet
- Enabling communication with you via e-mail, post, telephone and SMS/MMS.
- Enabling personal offers, marketing and event invitations via e-mail, post, telephone and SMS/MMS
- Providing special offers
- Deciding which means of payment we can offer you, for example through credit appraisal
- Improving our website, customer service and customer support through statistics
- Following legal instruments, for example accounting laws

The data is also used to an extent for marketing analyses, marketing surveys, statistics and business feedback.

What personal data do we process?

We only process personal data when we have legal grounds to do so. We do not process personal data in cases other than when it is needed to fulfil legal and contractual obligations. We process no sensitive personal data without your consent. Here are some examples of the personal data we process:

- Name
- Address
- E-mail address
- Telephone number
- User name
- Title
- Photograph
- Information that you have voluntarily supplied and registered in, for example, e-mail conversations
- Content that you publish yourself or share, so-called user-generated content
- IP address
- Customer number
- Information about products, offers and newsletters that you have been interested in, or have interacted with
- Which of our events you have responded to and/or participated in

For how long do we retain your information?

We save your personal data for up to seven years after your most recent purchase, or latest contact with us. We do this to fulfil our obligations under the Accounting Act and to provide you with service and support for the products you purchased from us. We do not, however, automatically remove you from our newsletters, as you yourself have the opportunity to unsubscribe at any time (via a link at the bottom of the page in every transmission) if you so wish.

How do we gain access to your personal data?

To the greatest extent possible we try to gain your consent before we process your personal data. We do this by allowing you to complete explicit consent clauses in cases where processing of personal data is based on consent. Additionally we gain access to your personal data in the following ways:

- Data that you supply us with directly
- Data registered when you visit our website (read more about cookies lower down)
- Data we receive from public registries
- Data we receive when you use the services of one of our partners
- Data we receive when you apply for one of our courses or seminars
- Data we receive when you sign up for our newsletters and other publications
- Data we receive when you respond to surveys and questionnaires
- Data we receive when you contact us, apply for employment with us, visit us or otherwise contact us

Legal basis for processing your personal data

ALO Center bases the processing of your personal data on a number of legal foundations:

- To the greatest extent possible we try to gain your consent before we process your personal data. We do this by allowing you to complete explicit consent clauses in cases where processing of personal data is based on consent
- In order to be able to fulfil our contractual obligations to you as a customer, for example delivering products you have ordered and contacting you with important product updates. Based on this legal foundation we also process data concerning your purchases, your behaviour on our website and your interest in different products, in order to be able to provide personal offers
- An amount of the processing of personal data that we do is based on an assumption of your interests This may, for example, imply that the processing we do in order to send you offers on our goods and services and to make a limited segmentation of customers, based on purchases in specific categories
- We also process your personal data due to legal obligations. This means, for example, data we need in order to fulfil the requirements of the Accounting Act

Profiling

ALO Center can process your personal data through profiling if you are a newsletter subscriber. We can analyse information about how you use our website, the products and offers that you have expressed an interest in or have purchased, and which newsletters you have interacted with. We do so in order to send you information that we believe is of particular interest to you. This may, for example, involve special offers, new products and product updates.

You may at any time raise objections to processing of personal data by contacting us at info@alocenter.se.

Your rights

You have the right to withdraw your consent at any time. We will subsequently no longer process your personal data or gather new data, on the condition that it is not required to fulfil our legal or contractual obligations. Keep in mind that withdrawal of consent may imply that we cannot fulfil any obligations we may have in respect of you. When erasing your personal data we cannot verify purchases from us made by you, and this means that we can no longer offer product support or remind you to update your software subscription.

You have the right to:

- Request a register abstract of the personal data we have about you.
- Request correction of your personal data.
- Request that we erase your personal data. This is only possible if the data is no longer necessary for the purposes it was gathered for. There may be legal requirements preventing us from immediately erasing your personal data, for example due to accounting legislation. In such cases we will ensure that your personal data is only processed for the purpose(s) required.

Please contact us at info@alocenter.se in order to request a register abstract, a correction or erasure of your personal data.

Is your personal data being processed in a safe manner?

We establish procedures and working methods for your personal data to be processed in a safe and secure manner. The basis is that only employees and those individuals within our organisation who need the personal data in order to carry out their work tasks shall have access to it.

Our security systems are developed with focus on privacy and afford a very high level of protection against intrusion, erasure and other alterations that may imply a risk to your privacy.

We do not transfer personal data in cases other than those expressly stated in this Policy.

When do we disclose your personal data?

Our premise is not to disclose your personal data to third parties unless you have consented to it, or if it is not necessary in order to fulfil our legal or contractual obligations. In cases where we do disclose personal data to third parties, we establish personal data privacy agreements, and ensure that personal data is processed in a safe manner.

In certain cases, we need to disclose your data to third parties, such as to our suppliers of the products we offer in our range, as well as to payment and communications services. For example, this is often required when ordering digital software in order for us to deliver the license to you.

In certain cases we need to disclose your personal data to a third country outside the EU/EES, if our supplier of a product you have ordered is located there.

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

Cookies

We use cookies on our website. We do this primarily to be able to provide functionality on the website, such as placing a product in the shopping basket. We also use cookies for statistical purposes and adapted advertising.

Personal Data Controller

ALO Center AB is the Personal Data Controller, which implies that we are responsible for how your personal data is processed and how your rights are maintained.

Questions?

Please contact us at info@alocenter.se if you have any questions concerning our processing of your personal data.