



PRIVACY POLICY

DSTNY, UPDATED MARCH 2024

1. Introduction

According to the General Data Protection Regulation (EU) 2016/679 (GDPR), a company is the controller of personal data when the company determines the purpose for which and the means by which personal data is processed. It is Destiny Sweden AB's, org.nr 556377-2317 ("**Dstny**") responsibility to ensure that all personal data which is handled in our operations is processed correctly and in accordance with applicable data protection legislation.

This Privacy Policy describes Dstny's processing of your personal data and your rights according to the GDPR.

Personal Data means all types of information which can, directly or indirectly, be attributed to a living natural person. Within Dstny's business activities, Personal Data such as given names and surnames, social security numbers, telephone numbers, address, postal codes, e-mail addresses etc. may be processed.

If you have questions about our processing of your Personal Data or would like to exercise any of your data protection rights, please get in touch with us. You will find information about how to contact us under the heading "Contact Information" at the bottom of this policy.

Dstny's Responsibility as Data Processor

Dstny provides the services to the Customer, where Dstny acts as data processor and the Customer as Data Controller. A Personal Data Processing Agreement is signed between the Customer and Dstny to ensure secure, correct and legal processing of Personal Data in each individual case. The Customer is the controller of Personal Data for the end user that are processed within the service and Dstny only process such data in accordance with instructions from the Customer. Dstny's processing of Personal Data on behalf of the Customer is not subject to this Privacy Policy.

Dstny's Responsibility as Data Controller

Dstny processes Personal Data in capacity as Data Controller in accordance with the information below.

2. The personal data we collect

We refer to the personal data we collect as "Customer Data", "Traffic Data" and "Recorded Media". What personal data we may collect about you is described below.

"Customer Data"

- Name of contact persons for billing reference
- Email address to contact persons & phone number
- On specified invoices (upon request from customer): name, employees phone number and data usage

"Traffic Data"

- On specified invoices
 - name,
 - employees
 - phone number
 - aggregated data usage
 - aggregated sms usage
 - aggregated phone calls per destination



- In self-service portal
 - Specification on aggregated information
- Incoming calls to answering services and call recording services
 - Calling and responding identity
 - Statistics related to response service including in-calling numbers

“Recorded Media”

- (Upon request from customer) recorded real time communication

2. Processing of Personal Data

2.1. Customers

Purpose and type of processing	Categories of data subjects	Categories of personal data	Legal basis for processing	Retention period
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<p>We collect contact information about Potential Customers (leads) and keep these contact details when leads become Customers. We use this data for the purpose to offer and sell our products and services and to administer the customer relationship. This is also done by entrusted Dstny partners.</p>	<p>Customers Potential Customers (leads)</p>	<p>• Customer Data</p>	<p>Legitimate interest (when you are a Potential Customer) Agreement (when you are a Customer)</p>	<p>As long as you are a customer and for 24 months after you have ended your contractual relationship with Dstny.</p>
<p>Purpose and type of processing</p>	<p>Categories of data subjects</p>	<p>Categories of personal data</p>	<p>Legal basis for processing</p>	<p>Retention period</p>

<p>We collect contact information about our Customers for billing purposes and charging for our services by managing invoices, payments and conduct credit disclosures. We also process traffic data to enable specified invoices for our Customers.</p>	<p>Customers</p>	<ul style="list-style-type: none"> • Customer Data • Traffic Data 	<p>Legitimate interest to secure correct invoicing</p>	<p>As long as you are a customer and for 24 months after you have ended your contractual relationship with Dstny.</p>
<p>Purpose and type of processing</p>	<p>Categories of data subjects</p>	<p>Categories of personal data</p>	<p>Legal basis for processing</p>	<p>Retention period</p>
<p>We retain personal data related to invoices for accounting purposes.</p>	<p>Customers</p>	<ul style="list-style-type: none"> • Customer Data • Traffic Data 	<p>Legal obligation</p>	<p>We retain some personal data for accounting purposes which under law must be kept for a period up to 7 years in accordance with the Swedish Book-keeping Act.</p>
<p>Purpose and type of processing</p>	<p>Categories of data subjects</p>	<p>Categories of personal data</p>	<p>Legal basis for processing</p>	<p>Retention period</p>

<p>We collect personal data when we communicate with you to provide service information and updates. When you call our customer service, the call can be recorded. When you chat with our customer service, the written texts can be analysed. We do this to educate our employees, improve our customer service and our way of working in order to always help you in the best possible way.</p> <p>Purpose and type of processing</p>	<p>Customers</p> <p>Categories of data subjects</p>	<ul style="list-style-type: none"> • Customer Data • Traffic Data • Recorded Media <p>Categories of personal data</p>	<p>Legitimate interest</p> <p>Legal basis for processing</p>	<p>Customer Data: As long as you are a customer at Dstny and for 24 months after you have ended your contractual relationship with us.</p> <p>Traffic Data: We save Traffic Data to help you if you experience issues with the services we deliver. This data is saved for 6-24 months.</p> <p>Retention period</p>
<p>We process personal data to evaluate, develop and manage our operations and services as well as our processes. For this purpose, we may also compile statistics and reports for analytical needs.</p> <p>Purpose and type of processing</p>	<p>Customers</p> <p>Categories of data subjects</p>	<ul style="list-style-type: none"> • Customer Data • Traffic Data <p>Categories of personal data</p>	<p>Legitimate interest</p> <p>Legal basis for processing</p>	<p>Customer Data: As long as you are a customer at Dstny and for 24 months after you have ended your contractual relationship with Dstny.</p> <p>Traffic Data: In order for us to continuously offer better services, we also save statistics based on this information. This data is saved for 6-24 months.</p> <p>Retention period</p>
<p>We process personal data to perform campaigns and advertisements of our services and products.</p> <p>Purpose and type of processing</p>	<p>Customers Potential customers (leads)</p> <p>Categories of data subjects</p>	<ul style="list-style-type: none"> • Customer Data <p>Categories of personal data</p>	<p>We require your consent for direct marketing.</p> <p>Legal basis for processing</p>	<p>As long as you are a customer at Dstny and for 24 months after you have ended your contractual relationship with Dstny. If you object to direct marketing, we will not process Customer data for this purpose.</p> <p>We process Customer data based on consent until you withdraw your consent. You can withdraw your consent in every e-mail send out.</p> <p>Retention period</p>



Purpose and type of processing	Categories of data subjects	Categories of personal data	Legal basis for processing	Retention period
We process personal data to send you news and updates about your Dstny product or service.	Customers	<ul style="list-style-type: none"> • Customer Data 	Agreement	As long as you are a customer at Dstny and for 24 months after you have ended your contractual relationship with Dstny.
Purpose and type of processing	Categories of data subjects	Categories of personal data	Legal basis for processing	Retention period
We have an interest in making our websites operate efficiently, providing account related functionalities, understanding how you interact with our website and what services or products you are interested in. You can read more about how we use cookies in our cookie policy .	Visitors of our website	Cookies, web beacons, clear GIF, pixels, tags and other similar online identifiers to analyze how you interact with our website.	Consent	Depending on the purpose of the cookie, different types of cookies will be stored for different periods of time. You can read more about the retention periods for cookies in our cookie policy .
Purpose and type of processing	Categories of data subjects	Categories of personal data	Legal basis for processing	Retention period
To ensure data security and to avoid misuse of the Service. We may process personal data in order to meet the security of all our services and communications networks, to detect or prevent various types of illegal use or use that otherwise violate the terms of service. We also process personal data to prevent network and service abuse, and to detect and prevent fraud, virus attacks, etc.	Customers	<ul style="list-style-type: none"> • Customer Data • Traffic Data 	Legitimate interest	<p>Customer Data: As long as you are a customer at Dstny and for 24 months after you have ended your contractual relationship with Dstny.</p> <p>Traffic Data: In order to comply with statutory obligation we may process your Traffic Data for 24 months after you have ended your contractual relationship with Dstny.</p>



2.3. Automated decision-making

We do not perform any data processing activities that result in automated decision-making.

3. Recipients of Personal Data and transfers to third countries outside the EU/EEC

In our capacity as Data Controller, we may assign the processing described above to a partner or supplier. Such processing will not be made for other purposes than as described above. Some partners and suppliers have parts of their businesses in countries outside the EU/EEC (so-called Third Countries). Transfer is only made to such countries that offer an adequate level of data protection according to the EU Commission, or if the supplier has a legally binding and enforceable instrument that guarantees the safety of the Personal Data.

Personal Data may also be shared with third parties such as authorities or attorneys in the event of suspected criminality or misconduct or with authorities, legal advisers or other actors, if we are required by law or the authority's decision.

4. Your rights as Data Subject

You have the right to:

- Request information on what type of Personal Data we process and you may request a copy thereof (record extract);
- Have incorrect Personal Data rectified and, in certain cases, request to have your Personal Data deleted;
- Object against the processing of certain Personal Data and request that the processing of your Personal Data is restricted;
- Withdraw your consent to Personal Data processing, if our processing is based on consent;
- Have the Personal Data you've provided us transferred to another Data Controller (right to data portability)

Please notice that if we restrict the processing of or erase your Personal Data we might not be able to provide the Service to you.

In order to withdraw your consent or exercise any other of your rights, you are welcome to contact our Data Protection Officer at dpo@dstny.se

If you are unhappy with how we process your Personal Data, you may also file a complaint with the Swedish Authority for Privacy Protection by [visiting www.imy.se](http://www.imy.se)

5. Protection of the Personal Data

Dstny has undertaken appropriate technical and organisational measures in order to protect Personal Data against loss, abuse, unauthorized access, disclosure, alteration and destruction. In order to ensure that the Personal Data is processed in a secure and confidential manner, Dstny uses firewalls and other security measures to protect networks against breach, authentication methods pursuant to industry standards. OWASP 2017 guidelines are followed for http interfaces. In order to secure the integrity of the Personal Data Dstny use encryption techniques when Dstny transfers such Personal Data to Dstny's servers.

Company employees and suppliers are bound by confidentiality agreements and are obligated to follow Dstny's rules for information and IT security and other internal policies that further regulates Personal Data processing.

6. Amendments to the Privacy Policy

Dstny reserves the right to amend this Privacy Policy at any time. The date for the latest revision is stated at the end of the Privacy Policy. If Dstny makes any changes to the Privacy Policy Dstny will notify this through our newsletters and notice on this web site. You are therefore recommended to regularly review this Privacy Policy in order to note any changes.



If this Privacy Policy is substantially revised compared to when Dstny obtained your consent, Dstny will notify you regarding these changes and, if necessary, obtain a new consent to Dstny's processing of your Personal Data.

7. Contact information

If you have any questions regarding the Privacy Policy or any other question regarding our processing, please feel free to contact us:

Destiny Sweden AB, reg. no. 556377-2317

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010-410 50 00

dpo@dstny.se

This Privacy Policy was last updated on 2024-02