

Data Protection Policy

Tahoe Solutions AB

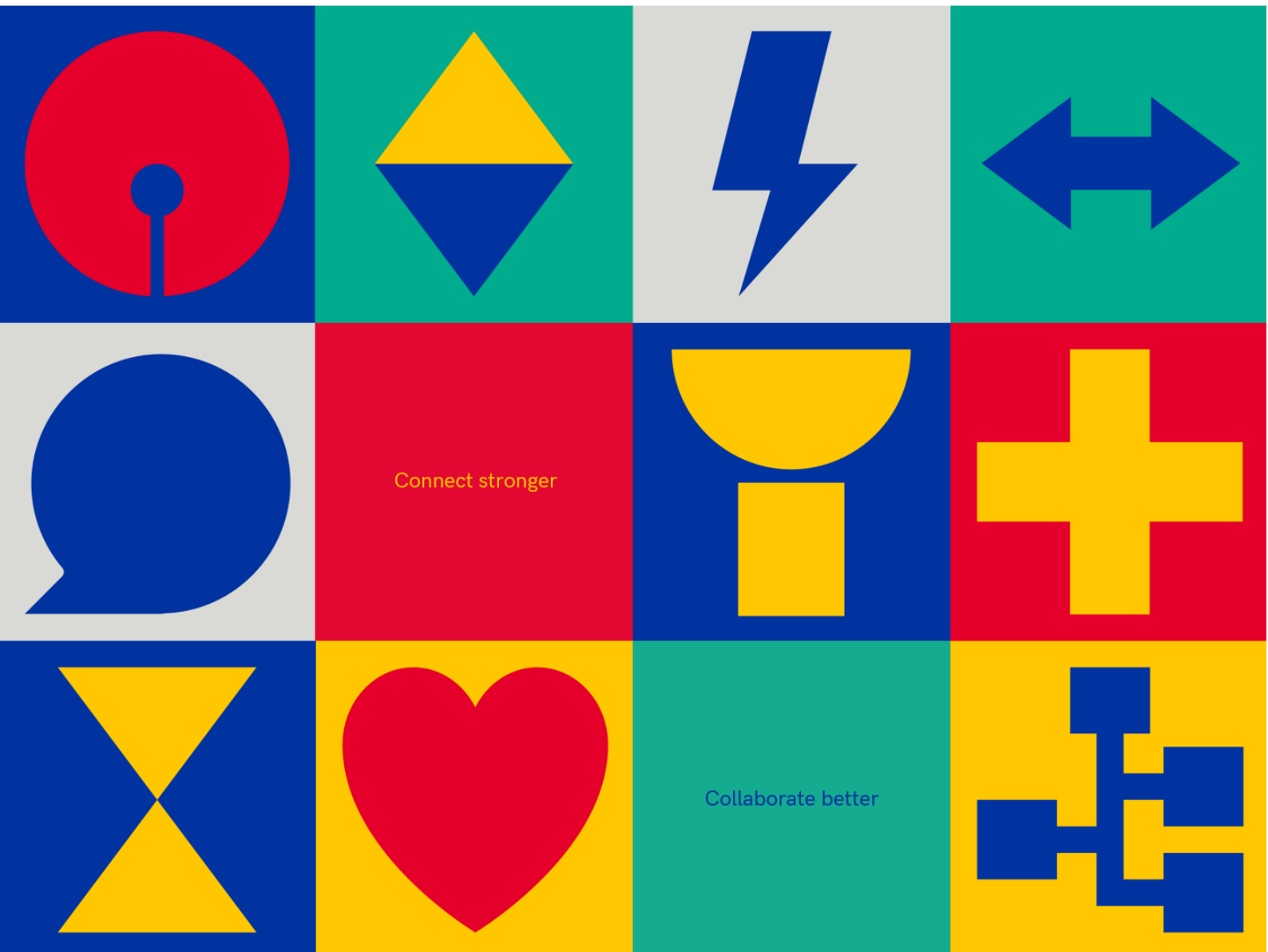


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1 Introduction

At Tahoe Solutions AB, personal privacy is important to us. It is important that you feel confident about how your personal data is processed by us. We therefore always strive to maintain a high level of protection for your personal data.

This Data Protection Policy explains how we collect and use your personal data. It also describes your rights and how you can exercise them.

You are always welcome to contact us if you have any questions about how we process your personal data.

2 Definitions

Personal data refers to information that can be directly or indirectly linked to a living natural person. Examples include names, personal email addresses, telephone numbers, and similar information. Encrypted data may also constitute personal data if it can be linked to a natural person.

Processing means any operation or set of operations performed on personal data, such as collection, storage, modification, or deletion.

Data controller means the natural or legal person, public authority, agency, or other body which alone or jointly determines the purposes and means of the processing of personal data. For all processing carried out under this policy, **Andreas Levin** is the data controller.

3 What personal data we collect about you and when

3.1 Personal data you provide to us

We process the name, email address, and telephone number of a contact person that you provide when registering and purchasing a service from us.

We also process your name, email address, and case details when you submit a support request to us.

3.2 Personal data from other sources

In our products, we collect information about which unique users have used our products. We process a unique user GUID, which is a digital identifier. This GUID is encrypted in our system. No individual at Tahoe Solutions AB has access to the encryption keys. The information is stored in a table in Tahoe's Azure Storage.

4 Why do we process your personal data?

4.1 Personal data under section 3.1

We process personal data under section 2.1 in order to provide the services you have requested. We also process the personal data to manage and administer our relationship with you and, where applicable, to administer the agreement with you.

4.2 Personal data under section 3.2

We collect unique user GUIDs under section 2.2 in order to calculate the number of unique users who use and have access to our products and services.

5 What is the legal basis for our processing of your personal data?

We always process your personal data in accordance with applicable legislation. We process your personal data when it is necessary to perform a contract with you or to respond to your request for services, or when we have another legitimate and justified interest in processing your personal data.

We also process personal data when the processing is necessary to comply with a legal obligation.

In addition, we process personal data based on our legitimate interest in knowing how many unique users are using our service.

6 Who may we share your personal data with?

We do not share your personal data with any third parties.

7 Where do we process your personal data?

Your personal data is processed only within the EU/EEA.

8 How long do we retain your personal data?

We never retain your personal data longer than is necessary for the respective purposes. We have established retention and deletion routines to ensure that personal data is not stored longer than required for the specific purpose.

The retention period varies depending on the purpose of the processing and how long the data is necessary for that purpose. After this period, the data will be securely deleted.

Certain accounting data must, due to legislation, be retained for at least seven years. Data processed under section 2.2 is automatically deleted after one year. Data processed under section 2.1 is deleted when the individual concerned terminates our services.

9 Your rights as a data subject

As a data subject, you have a number of rights under applicable data protection legislation. These rights are listed below.

9.1 Right of access

If you wish to know which personal data we process about you, you may request access to that data. When you submit such a request, we may ask certain questions to ensure efficient handling and to verify that the data is requested by and disclosed to the correct person.

9.2 Right to rectification

If you discover that any personal data we process about you is incorrect, you have the right to request that it be corrected. You also have the right to complete incomplete personal data. In some cases, you may be able to make corrections yourself, in which case we will inform you accordingly.

9.3 Right to erasure

You may request that we erase your personal data, for example if:

- the data is no longer necessary for the purposes for which it was processed

- you object to processing based on our legitimate interest and your objection outweighs our legitimate interest
- the personal data has been processed unlawfully
- the personal data has been collected in relation to a child (under 13 years of age) for whom you have parental responsibility
- the data was processed based on your consent and you withdraw that consent

However, we may have the right to refuse your request if there are legal obligations that prevent us from immediately deleting certain personal data. Processing may also be necessary to establish, exercise, or defend legal claims.

9.4 Right to restriction of processing

You have the right to request restriction of our processing of your personal data. For example, if you request rectification because you believe the personal data is incorrect, you may request restricted processing during the time we need to verify the accuracy of the data.

If, and when, we no longer need your personal data for the established purposes, our normal routine is to delete the data. However, if you require the personal data in order to establish, exercise, or defend legal claims, you may request restricted processing instead of deletion.

If you have objected to processing based on legitimate interest, you may request restricted processing while we assess whether our legitimate interests override your interests.

When processing has been restricted, we may only process the data (other than storage) to establish, exercise, or defend legal claims, to protect the rights of another person, or with your consent.

9.5 Right to object to certain types of processing

You always have the right to object to processing of personal data that is based on legitimate interest. You also always have the right to object to direct marketing.

9.6 Right to data portability

You have the right to data portability (transfer of personal data) if our right to process your personal data is based on your consent or on the performance of a contract with you. Data portability is subject to the condition that the transfer is technically feasible and can be carried out in an automated manner.

9.7 Exercising your rights

Requests for access to personal data or the exercise of any of your other rights must be submitted in writing and personally signed by the data subject. We will respond to your request without undue delay and no later than within 30 days.

Please send your request by email to the address below. Where possible, the email should be sent from the email address registered with us.

10 How is your personal data protected?

We actively work to ensure that personal data is handled securely, using both technical and organisational security measures. Such measures include access restrictions, two-factor authentication, and password protection.

User data processed under section 2.2 is encrypted, and no natural person has access to the encryption keys.

11 Supervisory authority

The Swedish Authority for Privacy Protection (Integritetsskyddsmyndigheten) is the supervisory authority responsible for monitoring the application of data protection legislation. If you believe that we are acting incorrectly, you may contact the authority via [imy.se](https://www.integritetsskyddsmyndigheten.se).

12 Our contact details

If you have any questions about how we process personal data, or if you wish to submit a request in accordance with the rights described above, you are welcome to contact us:

Tahoe Solutions AB

Company registration number: 556970-5196

Visiting adress: Torggatan 4, 211 40 Malmö

Email: Andreas.levin@tahoerolutions.se

Telephone: 0701 872 8880

13 Changes to this Data Protection Policy

We reserve the right to make changes to this Data Protection Policy. The most recent version is always available on our website. Any changes that are of material importance to our processing of personal data will be communicated to you.