

Innovation 360 Group AB – Privacy Policy InnoSurvey™

1. INTRODUCTION

Innovation 360 Group AB, 556990-0904, (“I360” or “We”, “Our” or “Us”) care deeply about privacy and welcomes the European Union’s General Data Protection Regulation (“GDPR”). We are obliged to collect and process personal data in accordance with the GDPR, regardless whether Our customers and users are based within the EU or not. We take Our obligations seriously and always collects personal data responsibly and with Your privacy in mind.

We provide a web-based innovation assessment tool called InnoSurvey™ which can be used by companies and organizations for innovation assessment. InnoSurvey™ is accessed through Our websites; www.innovation360.com and www.inno-survey.com (the “Website”).

This privacy policy explains how We process information that can be used to directly or indirectly identify an individual (“Personal Data”) collected through use of InnoSurvey™.

Personal Data is defined in Article 4 (1) of the GDPR:

'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

In this policy We will make a distinction between:

FREE INNOSURVEY™ POLLS AND I360 INVITE LINKS TO USE INNOSURVEY

- data submitted by You using i) Our free public version of InnoSurvey™ accessed through the Website or ii) InnoSurvey™ through a link/invitation sent to Your mail by I360 (e.g. in connection with an Innovation Circle); and

INVITE LINKS TO USE INNOSURVEY™ SENT BY I360 LICENSED PRACTITIONER OR YOUR EMPLOYER

- data submitted by You after accessing InnoSurvey™ through an invitation/link sent to Your mail by either I360 Licensed Practitioner or Your employer.

In this privacy policy We define the term “Visitor” for any individual that visits Our Website and the term “You” for any Visitor and any individual who uses and/or administrates InnoSurvey™ and/or submits answers to polls in InnoSurvey™ or submits other information through InnoSurvey™.

2. VISITOR DATA

2.1. Collection

We only collect information about a Visitor which is voluntarily submitted by the Visitor.

Information which may be voluntarily submitted by a Visitor when visiting the Website is limited to the Visitor's e-mail address.

2.2. Purpose of and legal basis for processing Visitor Personal Data

We use the Visitor Personal Data to:

- send newsletters and market Our Services
 - o **Legal basis:** Visitor's explicitly given consent

3. **FREE POLLS AND I360 INVITE LINKS**

3.1. Collection

If You use the free version of InnoSurvey™ accessed through Our Website or if You access InnoSurvey™ after having used an invitation/followed a link sent to You by I360 We will collect, and process information entered into InnoSurvey™ such as:

- e-mail address and
- password

In order for InnoSurvey™ to generate an innovation assessment report You will also need to answer several questions in an InnoSurvey™ poll/questionnaire. The information We may collect through the poll/questionnaire consist of information such as:

- Your work title
- Your company's location
- answers regarding Your personal opinion of Your company's/employer's innovation capability

3.1.1. Purpose of and legal basis for processing Your Personal Data

Your Personal Data may be used to:

- identify You, provide You with support, services and updates regarding Your account (sending e-mails and communicating with You in other ways), generating an innovation assessment report based on the answer submitted into an InnoSurvey™ poll, and sending You such innovation assessment report
 - o **Legal basis:** contractual necessity, processing is needed in order to provide Our service and deliver the requested InnoSurvey™ report and Our legitimate interest to be able to identify the user of Our service and communicating with You regarding the service and assessment report
- market Our services and send newsletters
 - o **Legal basis:** Your voluntarily and explicitly given consent

4. **INVITE LINKS SENT BY I360 LICENSED PRACTITIONER OR YOUR EMPLOYER**

If You access InnoSurvey™ and/or create an account after having used an invitation/followed a link sent to You by Your employer or an I360 Licensed Practitioner, then it is such employer's or Licensed Practitioner's responsibility to ensure that the collection and processing of Your Personal Data in InnoSurvey™ is done in accordance with applicable law.

Your Personal Data may, in this situation, be entered into InnoSurvey™ by You, Your employer, an I360 Licensed Practitioner or by Us on behalf of Your employer or an I360 Licensed Practitioner. Your Personal Data may furthermore consist of name, work title, name of employer, e-mail address, answers submitted by You in an InnoSurvey™ poll (including answers regarding Your personal opinion of Your company's/employer's innovation capability).

It is Your employer or the I360 Licensed Practitioner who will be the "controller", as defined in the GDPR for Your Personal Data. The purpose of processing Your data in this situation will consequently be defined by Your employer or the I360 Licensed Practitioner and not by Us.

If You wish to inquire about Your Personal Data that may have been collected through the use of InnoSurvey™ in this situation, We recommend that You contact Your employer or the I360 Licensed Practitioner, whomever sent You the invitation/link to use InnoSurvey™.

Our interaction with You may consist of that We, on behalf of Your employer or the I360 Licensed Practitioner, will send You auto generated follow up e-mails with information and updates regarding Your InnoSurvey™ poll.

As We, in this situation, are a "processor", as defined in the GDPR, of Your Personal Data, except for what is stated below (marketing and newsletter), We do not control Your Personal Data, We processes it on behalf of Your employer or the I360 Licensed Practitioner whomever sent You the invitation/link to use InnoSurvey™.

Marketing and newsletter

We may collect, if You give Your explicit consent, Your e-mail address after You have completed an InnoSurvey™ poll, and We will use it to send You newsletters and market Our services by e-mail to You.

- **Legal basis:** Your voluntarily and explicitly given consent

5. SHARING AND TRANSFER OF PERSONAL DATA

We may only disclose Personal Data insofar as reasonably necessary for the purposes set out above in this Privacy Policy and in order to provide You with Our services, to:

- Our employees, agents, suppliers or subcontractors and to any member of its group of companies (this means Our subsidiaries)
- third-party hosting suppliers (servers placed within the EU)

We do NOT sell Personal Data to any third party without Your prior consent.

6. HOW LONG DO WE KEEP PERSONAL DATA?

6.1. Personal Data for which We are controller

We will not retain Personal Data longer than is necessary to fulfill the purposes for which it was collected or as required by applicable laws or regulations.

6.1.1. Contractual obligations or to provide service

Personal Data needed in order to fulfill Our contractual obligations or to provide service towards You will be kept for the duration of a valid agreement between Us and You, or the entity You represent, or for as long as needed to provide You or the entity You represent, with requested service, and for a period of ten (10) years thereafter.

At the expiry of the above time limit all Your Personal Data will be deleted or anonymized (answers to InnoSurvey™ polls for instance), as required by applicable law.

6.1.2. Marketing and newsletter

We will hold Your data for marketing purposes for a period of six (6) years.

You have the opportunity to opt out from receiving newsletters and marketing e-mails from Us.

6.2. *Personal Data for which We are processor*

For Your Personal Data, for which Your employer or the I360 Licensed Practitioner have control of the purpose for collecting Personal Data, and the duration for which the Personal Data may be kept. It is the controller who have the responsibility to delete Personal Data when required. When and if Your account is terminated or expired, all Your Personal Data collected through the InnoSurvey™ will be deleted or anonymized (answers to InnoSurvey™ polls will be anonymized for instance), as required by applicable law.

7. RECTIFICATION, ACCESS AND ERASURE OF PERSONAL DATA

7.1. *Personal Data for which We are controller*

You may request access to and a copy of the personal data that We process in relation to You if You would like to know and verify the information We have on You.

You have the right to correct inaccurate and/or incomplete information about Yourself. You have the right to be forgotten, which means You may request the deletion of Your Personal Data insofar as this Personal Data is no longer necessary for the purpose it was collected, or We have a legitimate interest to hold it. At Your request all Your Personal Data collected through the InnoSurvey™ will be deleted, or anonymized (answers to InnoSurvey™ polls will be anonymized for instance), as required by applicable law.

You also have a right to withdraw any consent You have given, as well as ask Us to cease Our marketing efforts towards You.

7.2. *Personal Data for which We are processor*

For Personal Data for which We are processors We do not have control of the Personal Data and do not set the routines regarding rectification, access and erasure of Your Personal Data. Please contact Your employer or the I360 Licensed Practitioner, whomever sent You the invitation/link to use InnoSurvey™.

8. DATA PORTABILITY

It is also Your right to receive the Personal Data which You have given to Us, in a structured, commonly used and machine-readable format and You have the right to transmit such Personal Data to another controller.

9. CHANGES TO THIS PRIVACY POLICY

Please note that this Privacy Policy may change from time to time. If We change this Privacy Policy in ways that affect how We use Your personal information, We will advise You of the choices You may have as a result of those changes. We will also inform You of that this Policy Privacy has changed.

10. CONTACT INFORMATION AND COMPLAINTS

If You have any questions regarding this Privacy Policy or if You wish to exercise Your rights, please contact Us at:

Innovation 360 Group AB, 556990-0904
Olofs Palmes gata 13
111 37 Stockholm

info@innovation360.se

If You have any complaints regarding this Privacy Policy or in the way We handle Your personal data You may always contact The Swedish Data Security Authority (*Sw. Datainspektionen*).