

PRIVACY POLICY

FOR

REFERANZA.COM AND THE REFERANZA SERVICE

Last Updated: 2018-05-24

Please read this privacy policy (the "**Privacy Policy**") carefully before using the Referanza services (the "**Services**") and the site www.referanza.com (the "**Site**") as operated by Referanza AB ("**Referanza**", "**Us**", "**We**" or "**Our**").

We are committed to protecting the privacy of the users of the Services and the Site. We are subject to the Swedish Data Protection Act (2018:218), General Data Protection Regulation (Regulation no. 2016/679) and the Swedish implementations of the Directive on Privacy and Electronic Communications (Directive 2002/58/EC). This Privacy Policy informs you about Our Personal Data privacy practices in the capacity of data controller for the processing of personal data connected to the Site and the Services. This Privacy Policy applies when you are using the Services or visiting our Site. "**Personal Data**" means any information relating to an identified or identifiable person under applicable data protection laws.

If you have questions or concerns regarding this Privacy Policy, you should contact Referanza by e-mail at info@referanza.com.

1 OUR USE OF YOUR PERSONAL DATA

We process the following Personal Data for **Site visitors** for the following purposes:

- To customize content displayed on the Site
 - your activity on Our Site including user-specific and aggregate information on areas of the Site accessed
 - a list of URLs starting with a referring site and the site you exit to;
- To customize the layout of the Site
 - domain name, Internet Protocol (IP) address and operating system
- To notify visitors of the Site about updates to and activities on the Site and about goods and services that We feel may be of interest to Site visitors:
 - contact information (including, name, address, zip code, country, phone number and job title)
- To improve the content of the Site
 - your activity on Our Site including user-specific and aggregate information on areas of the Site accessed
- To analyse data and patterns regarding usage of the Site
 - domain name, Internet Protocol (IP) address and operating system
 - your activity on Our Site including user-specific and aggregate information on areas of the Site accessed
 - a list of URLs starting with a referring site and the site you exit to
- To contact visitors of the Site for marketing purposes
 - contact information (including, name, email, address, zip code, country, phone number and job title)

- gender
- To contact visitors of the Site for information verification purposes:
 - contact information (including, name, email, address, zip code, country, phone number and job title)

We process the Personal Data for **Services users** for the following purposes:

- To provide the Services
 - financial information, such as account or credit card numbers
 - username and password information for the Services
- To customize content displayed through the Services
 - your activity on Our Site including user-specific and aggregate information on areas of the Site accessed
 - a list of URLs starting with a referring site and the site you exit to
- To customize the layout of the Services
 - domain name, Internet Protocol (IP) address and operating system
- To notify users of the Services about updates to and activities on the Services and about goods and services that We feel may be of interest to you
 - contact information (including, name, email, address, zip code, country, phone number and job title)
- To improve the content of the Services
 - your activity on Our Site including user-specific and aggregate information on areas of the Site accessed
- To analyse data and patterns regarding usage of the Services
 - domain name, Internet Protocol (IP) address and operating system
 - your activity on Our Site including user-specific and aggregate information on areas of the Site accessed
 - a list of URLs starting with a referring site and the site you exit to
- To contact users of the Services for marketing purposes
 - contact information (including, name, address, zip code, country, phone number and job title)
 - gender
- To contact users of the Services for information verification purposes
 - contact information (including, name, address, zip code, country, phone number and job title)

We will not share Personal Data We collect through the Site or Services with third party companies for their marketing purposes. We will not sell, share, transfer, or process the Personal Data We collect from users or receive from Our customers or other third parties regarding Site visitors and Service users other than as stated in this Privacy Policy.

We do not knowingly solicit or collect, and you should not provide, any Personal Data other than the Personal Data listed above.

You should not provide Us with any Personal Data unless you would like that information to be used in accordance with this Privacy Policy.

2 LEGAL GROUNDS

We process the Personal Data of Our Site visitors and Services users based on the legal ground of legitimate interest.

Site visitors: To ensure that the legal ground of legitimate interest is applicable We carefully assessed if Our business interest to identify new customers and to get in contact with them to offer them Our Services does not disproportionately take away your right to privacy. The same balancing assessment was applied to Our interest to provide you with the best user experience on Our Site and to show you the things you might be interested in. In both cases it was concluded that Our interest is legitimate and that the safeguards are in place to protect your right to privacy.

Services users: To ensure that the legal ground of legitimate interest is applicable We carefully assessed if Our business interest to keep in touch with you is legitimate and that adequate safeguards are in place to protect your right to privacy. The same balancing test was conducted for the processing done for the purpose of providing you with the Services in the best way possible. In both cases it was concluded that Our Interest is legitimate and that your right to privacy is outweighed by it without posing a disproportional threat to it.

3 RETENTION OF PERSONAL DATA

If you are a Site visitor We store your Personal Data for a up to a year after you have visited Our Site so you can pick up where you left (e.g. to ensure that the Site is immediately displayed in the same language you chose the previous time and you do not have to accept the cookie banner each time you visit).

If you are a Services user We store your Personal Data for as long as the company you belong to is a Services customer. Financial data will be stored for as long as required by applicable bookkeeping laws.

4 NON-PERSONAL DATA

Our systems may automatically recognize and collect non-personal data regarding your use of the Site and Services. This information allows Us to improve the Site and Services, facilitate research and analysis of the Site and Services, and develop and refine Our Services. Sometimes, We utilize the services of a third party to help Us understand this information better, although the information that is disclosed to these entities remains at all times in anonymous and non-personally identifiable form. We may also provide this information to Our customers in anonymous and non-personally identifiable form.

5 DISCLOSURE OF PERSONAL DATA

We may share and disclose your Personal Data to sub-processors that enable us to deliver the site and service. A complete list of current sub-contractors is available [here](#).

Referanza will not transfer information to any of the processors unless it first ascertains that the processor is subject to adequate Personal Data protection requiring that the processor provide at least the same level of privacy protection as is required under applicable data protection legislation.

Though We make every reasonable effort to preserve user privacy, We may need to disclose Personal Data of certain users of the Site or Services when We have a reasonable and good-faith belief that the disclosure is necessary to enforce the terms and conditions for the Site or Services, comply with a judicial proceeding, court order or other legal process, or to otherwise enforce or protect Referanza’s rights under applicable law, including, without limitation, Referanza’s intellectual property rights. In this situation We will use reasonable efforts to provide notice of this disclosure to all affected users, to the extent reasonably possible under the circumstances.

When visiting Our Site or using the Services you may be directed to other websites where the Personal Data collected is not in Our control. The privacy policy of the other website will govern the Personal Data obtained from you on that website.

6 COOKIES

We collect information by using technology such as cookies, pixels and tags. These are commonly used pieces of information in the form of small files that are placed on an individual’s computer hard drive to enable the individual to more easily communicate and interact with the Site and Services. We may use cookies on the Site or in communications sent through the Services for various purposes, including by way of example:

- saving user preferences;
- customizing content of the Site for individual users;
- recording session information;
- saving certain information about users of the Site and others who visit the Site; and
- facilitating and enhancing interaction with the Site.

Referanza does not use these technologies to retrieve information from a computer that is unrelated to Referanza or the Site or Services.

Most browsers will allow you to erase cookies from your computer hard drive, block acceptance of cookies, or receive a warning before a cookie is stored. You may also be able to refuse certain web beacons by adjusting the settings on your browser or email software. Please refer to your browser or email software instructions or help screen to learn more about these functions.

You specifically consent to and accept Our use of cookies as described in this Privacy Policy.

Type	Name of Cookie	Domain	Retention Purpose	Retention period
Functionality cookie	apicsrftoken, apisessionid, messages, beta django_language	.referanza.com	Site settings	1 year
Analytics cookie	__hstc, __hssrc, __hssc, __hs_opt_out	Hubspot.com	https://legal.hubspot.com/cookie-policy	1 month – 10 years

Analytics cookie	_ga, _gat, _gid	Google.com	https://policies.google.com/privacy	1 month – 2 years
Analytics cookie	_hjIncludedInSample etc	Hotjar.com	https://www.hotjar.com/legal/policies/cookie-information	1 year
Analytics cookie	mp_.....	Mixpanel.com	https://mixpanel.com/legal/privacy-policy/	1 year

7 CHILDREN

The Services are not directed at persons under the age of 13. If you are a parent or guardian of a person under the age of 13 and you become aware of that the child has provided Personal Data to Us without your consent, please contact info@referanza.com to exercise your access, rectification, erasure, limiting of processing and objection rights.

8 YOUR RIGHTS

You have an absolute right to object to the processing of your Personal Data for direct marketing. You can exercise this right at all times by clicking the unsubscribe button in the footer of the marketing emails.

You also have the right to recall your prior given consent. The withdrawal of your consent does not affect the lawfulness of the processing based on the consent before its withdrawal, and We may continue processing your Personal Data based on other legal grounds, except for direct marketing.

You have the right to request access and further information concerning the processing of your Personal Data.

If the processing is based on the legal ground fulfilment of contract you have the right to data portability. To the extent you do not have the ability to correct, amend, block or delete Personal Data directly through the Services, Referanza shall comply with any reasonable request by You to facilitate such actions to the extent Referanza is legally permitted to do so. To the extent legally permitted, You shall be responsible for any costs arising from Referanza’s provision of such assistance.

In order to control that We process up-to-date and accurate Personal Data, you have the right to, free of charge and once per year, obtain an excerpt of the Personal Data that We process about you. Such request must be undersigned by you personally and sent by regular mail to the address below.

Referanza takes reasonable steps to ensure the data We collect is reliable for its intended use, accurate, complete and current. The users of the Site or Services should email Us at info@referanza.com to review, delete, deactivate, update or change any personal information that was previously provided to or collected by Referanza.

9 NOTIFICATION OF CHANGES

We will notify users of any changes to this Privacy Policy. Notification will be made by way of an e-mail or by posting of the changes on the Site. Changes to this Privacy Policy will be effective 30 days following notice. Your continued use of the Site or Services after any change has become effective will constitute your acceptance of that change.

Unless We seek and receive consent from a user, We will use information We collect from users in accordance with the version of the Privacy Policy effective when the information was last collected. Users may contact Us regarding any change to this Privacy Policy, including to prevent their information from being used pursuant to any change to this Privacy Policy, by emailing Us at info@referanza.com.

10 SECURITY

We will use industry standard security measures on the Site to protect the loss, misuse and alteration of the information under Our control. While there is no such thing as “perfect security” on the internet, We will take reasonable steps to ensure the safety of your personal information. For example, Our policy is that only those individuals who need your Personal Data to perform a specific job are granted access to that Personal Data. Likewise, all employees and contractors are kept up-to-date on Our security and privacy practices. Finally, the servers that We store Personal Data on are kept in a secure environment.

11 VERIFICATION

Referanza utilizes a self-assessment approach to ensure its compliance with this Privacy Policy. We regularly verify that this Privacy Policy is accurate, comprehensive, prominently displayed, completely implemented and in conformity with the applicable data protection legislation and conduct Our self-assessment on an annual basis. We appropriately train Our employees and have internal procedures for conducting objective compliance reviews.

12 TRANSFER OF INFORMATION

If Referanza elects, in its reasonable discretion, to transfer ownership or control of the Site or Services to a third party, whether or not in the context of an acquisition, merger, or reorganization, We will ask for your consent to the transfer of your Personal Data and non-Personal Data by Referanza to that third party, provided that all use of your information by that third party remains subject to the terms of this Privacy Policy and any applicable requirements of the applicable data protection legislation.

13 CONTACT INFORMATION

All inquiries concerning this Privacy Policy and the Site or Services in general may be sent to Us on the contact details set out below.

Referanza AB
P.O. Box 3230
103 64 Stockholm
Sweden

info@referanza.com

www.referanza.com

If you have any complaints regarding Our processing of your Personal Data, you may file a complaint to the competent data protection authority. You can find out more about the local data protection authorities under the following link http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.