

PRIVACY POLICY FOR EPICENTER

1. GENERAL INFORMATION

- 1.1 EP Center Management AB, company registration number 556919-8657, having its registered address at Mäster Samuelsgatan 36, 111 57 Stockholm ("**Epicenter**", "**we**" or "**us**") acts as the personal data controller for the personal data processed under this Privacy Policy. We understand that your personal data is important to you and therefore we want to make it clear to you how we work with your privacy and process your personal data.
- 1.2 This Privacy Policy describes the information we collect, the purpose for which they are collected, the legal basis for our processing, the way in which you can exercise your rights and how to contact us. This Privacy Policy applies when you register as a member of us or when using our services provided through our guest portal, member portal, using our IT network or our website and other services provided to you at our address such as visiting us as a guest (hereinafter referred to as our "**Services**"). It is important that you read and understand our Privacy Policy before using the Service.
- 1.3 All definitions in this Privacy Policy shall be interpreted in accordance with applicable data protection laws which refers the General Data Protection Regulation (Regulation no. 2016/679) and the Directive on Privacy and Electronic Communications (Directive 2002/58/EC), as well as the national implementations and related national legislation.

2. PROCESSED DATA

2.1 Members

We will process the following personal data for the purpose of providing our Services to you as a member and to fulfil requirements by law:

- (a) Name;
- (b) Address;
- (c) Phone number;
- (d) E-mail address;
- (e) Profession; Company name including organization number or personal identification numbers;
- (f) Billing address; and
- (g) IP address and MAC address when using our network.

If you choose to create a user account, we will also process the following for the purpose of creation and administration of your user account:

- (i) Username; and
- (ii) Password.

Our processing of your personal data as a member is based on the legal basis of performance of the contract with you as a natural person or on the legal basis of legitimate interest if you act as your company's or organization's representative. Epicenter also has a legitimate interest in maintaining a good customer relationship with you, providing you with information relevant to your use of the Services, improving and further developing the Service. Epicenter further has a legitimate interest in conducting and managing our business to enable us to provide you with the best possible service and a good and safe user experience.

Epicenter needs the above information in order to fulfil our commitments and provide the Services to you as a member. We only process the personal data that we consider necessary. If we do not get access to the above information, we will also not be able to provide the Services to you or your company/organization.

2.2 Guests

We will process the following personal data for the purpose of providing our Services to you as a guest, to be able to search for a member or meeting referred to and to fulfil requirements by law:

- (a) Name;
- (b) E-mail address;
- (c) Phone number (optional);
- (d) IP address, MAC address and other technical data about you when accessing the Services and using our network; and

Epicenter also has a legitimate interest in maintaining a good relationship with you as a guest, providing you with information relevant to your use of the Services, improving and further developing the Service. Epicenter further has a legitimate interest in conducting and managing our business to enable us to provide you with the best possible service and a good and safe user experience.

Epicenter needs the above information in order to fulfil our commitments and provide the Services to you as a guest. We only process the personal data that we consider necessary. If we do not get access to the above information, we will also not be able to provide the Services to you or your company/organization.

2.3 Marketing and newsletters

In order for us to send newsletters by e-mail to you, send invitations regarding our events, lectures and joint member activities, or to market relevant products and Services according to your interests. We will process the following personal data:

- (i) Name; and
- (ii) E-mail addresses.

Epicenter will only process the personal data above with your consent. You can at any time withdraw your consent for the processing by unsubscribing to our newsletter.

2.4 Feedback and security maintenance

Beside the above purposes of processing we might process your personal data for the following purposes:

- (i) To ask for your feedback and opinion regarding our Services from time to time;
- (ii) To check, prevent, investigate or take other actions in connection with abuse of our Services or in connection with the use of the Services in violation of the Terms of Service or Membership Terms or legal procedures, suspected fraud or potential threats against Epicenter or rights of others.

Our legal ground for the above-mentioned purposes is our legitimate interest to provide a well-functioning platform and to constantly provide better Services for our users. In that we also have a responsibility to check, prevent and investigate any actions in connection with the use of the Services and in violation of Terms of Service, Membership Terms or in violation of the law.

In order to improve and develop our Services, ensure the technical functionality of our Services and improve the security of our networks and information systems, we regularly analyse our users' use of the Services, such as which device or equipment is being used most frequently amongst our users. However, this is done on an aggregate level and in an anonymous manner.

3. DISCLOSURE OF PERSONAL DATA

3.1 Transfer of personal data within Epicenter's group company.

Your personal information may be disclosed to other companies within the Epicenter Group, in order for them to independently process your personal information for the purpose of presenting information and enhancing your user experience in marketing or visits to other local Epicenter buildings. Examples of such information may be member information containing contact information, personal identification number and company membership. The aim is that you as a member should be free to visit other Epicenter buildings without re-registering. Should you be contacted by any of these companies, they will inform you about the personal data policy that applies to the proper processing of data within that company.

3.2 Transfer of personal data to third parties

We will not divulge, sell, transfer or otherwise disclose personal data beyond the terms of this Privacy Policy, unless we are required to do so by law or as a result of a court order or authority decision or if we have received your consent to such disclosure.

Epicenter can hire external providers to perform tasks on behalf of Epicenter, e.g. to provide IT services, update address information or help with marketing and analysis. The execution of these services may mean that Epicenter's suppliers, both within the EU/EEA and outside the EU/EEA, have access to your personal information. These suppliers process personal data

on our behalf in accordance with a data processing agreement and in accordance with our instructions.

3.3 Transfer of personal data to third countries

Epicenter only collaborates with partners processing personal data within the EU/EEA. In case Epicenter chooses to hire suppliers outside the EU/EEA, Epicenter will undertake appropriate safeguards for the processing such as Privacy Shield or EU Model Clauses. You can acquire further information regarding the transfer by contacting us.

3.4 Links to other websites

When using the Services, you may be directed to other websites or materials belonging to a third party 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.

4. RETENTION OF PERSONAL DATA

4.1 Personal data is processed only for as long as it is necessary for the purposes above or to the extent otherwise required by law.

4.2 For personal information relating to the membership, we will process your personal data starting from when you become a member and then up to 12 months after you terminate your membership. This is for administrative and accounting purposes, such as any missed payments and the opportunity for you to recreate your account.

4.3 For personal information relating to when you use the Services as a guest, we will process your personal data for 12 months after the visit. This is retained for administrative purposes.

4.4 For accounting information that may constitute personal data, we have an accounting obligation according to the Bookkeeping Act to archive the information for 7 years after the end of the financial year.

4.5 If you subscribe to our newsletter, your contact information will be retained for as long as you choose to continue receiving the newsletter. You may withdraw your consent for the newsletters at any time with the unsubscription link at the bottom of each newsletter we send out.

4.6 The same personal data can be stored in several different locations for different purposes. This may mean that a task that has been deleted from a system because it is no longer necessary may remain in another system where it is stored on the basis of another legal basis or for another purpose where the personal data is still needed.

5. YOUR RIGHTS

You have a wide range of rights regarding the information we collect about you. Below we describe these. You may exercise these rights by contacting us by using our contact information below, see the section of "CONTACT INFORMATION".

5.1 Right to information

You have the right to request access and further information concerning the processing of your personal data. You also have the right to obtain a copy of the personal data that we

process relating to you free of charge. For any additional copies requested by you, we may charge a reasonable fee based on administrative costs.

5.2 Right to rectification

You have the right to request that we correct, complete or rectify the processing of your personal data.

5.3 Right to erasure

You may, in some cases, have the right to have your personal information deleted:

- (i) If personal data is no longer necessary for the purposes for which they were collected;
- (ii) If the processing is based on your consent, you have the right to withdraw your consent at any time which means that we will delete your personal data; or
- (iii) If personal data has been processed illegally or they must be deleted due to legal obligation;

However, the right to erasure is not applicable in some cases, for example, if the processing is necessary in order for Epicenter to comply with a legal obligation or in order for Epicenter to be able to determine, claim or defend legal claims.

5.4 Right to restriction

In some cases, you may request that Epicenter limit the processing of your personal data, such as:

- (a) if you do not believe that your personal information is accurate for which Epicenter shall have time to check this;
- (b) if the processing is illegal and you do not want us to delete the data;
- (c) if Epicenter no longer needs the information but you need them for legal claims or if you object to Epicenter's processing based on our legitimate interest and it is pending verification regarding if the legitimate reasons of Epicenter or a third party override your rights and freedoms.

5.5 Right to object

You have the right to object to the processing of your personal data based on our legitimate interest at any time. Epicenter may not continue to process such personal data unless Epicenter cannot provide compelling legitimate reasons for such processing that overrides your interests, rights and freedoms. However, Epicenter may continue processing such personal data for the determination, exercise or defence of legal claims.

You have an absolute right to object to the processing of your personal data for direct marketing, which means that if you object to such processing Epicenter may no longer process your personal information for direct marketing purposes. You can at any time opt-out from receiving marketing communications from us by clicking "unsubscribe" in the email we send you at the time of collection and any subsequent e-mail thereafter.

5.6 Right to data portability

If the processing is based on the legal grounds of consent or fulfilment of contract you have the right to data portability. Data portability means that you can receive the personal data that you have provided to us, in a structured, commonly used and machine-readable format, and have the right to transfer such data to another data controllers.

6. COOKIES

6.1 When you visit our website, we use cookies and similar tracking techniques to collect information about you. Learn more about our use of cookies and similar tracking techniques in our Cookie Policy available [here](#).

7. CONTACT INFORMATION

7.1 To exercise your rights, or if you have any questions regarding our processing of your personal data, feel free to contact us by sending an e-mail to: hello@epicenterstockholm.com or mail us by sending a request to the address EP Center Management AB, Mäster Samuelsgatan 36, 111 57 Stockholm. In your letter/email please state your full name and contact information. Note that you should sign the request to receive information of the processing of your personal data yourself.

8. LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

8.1 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.

9. NOTICE OF CHANGES TO THE PRIVACY POLICY

9.1 If we make changes to this Privacy Policy we will notify you on our website. If material changes are made to the Privacy Policy, we will within reasonable time notify you about this through your e-mail.

COOKIE POLICY FOR EPICENTER

This cookie policy describes how EP Center Management AB, company registration number 556919-8657, having its registered address at Mäster Samuelsgatan 36, 111 57 Stockholm (“Epicenter”, “we” or “us”) uses cookies at <https://weareepicenter.com/stockholm> (the “Website”).

WHAT IS A COOKIE?

A cookie is a small piece of data sent from a Website and stored in a user's web browser, mobile phone, or other device while the user is browsing that Website. A cookie can help the Website provider to recognize your device and/or browser the next time you visit that Website, provide you with access to certain functions on the Website and/or register your surf patterns. There are other technologies such as pixel tags, web bugs, web storage and other similar files and technologies that may carry the same functions as cookies. In this cookie policy, we use the term “cookies” for cookies and all such similar technologies.

WHICH TYPES OF COOKIES DO WE USE?

We use the following cookies:

Strictly necessary cookies – These cookies are strictly necessary in order to enable you to move around the website and use its features. The Website cannot function without these cookies. Strictly necessary cookies do not require your consent as they enable services you have specifically asked for and which cannot be provided otherwise.

Functionality cookies – These cookies enable the Website to save details that you have provided in order to offer a better experience, such as, e.g. allow the Website to remember choices you make such as your username, language or the region you are in. Some parts of the Website may not function properly without these cookies. These cookies may be automatically enabled and can be managed to your preferences through your browser settings.

Performance cookies – These cookies are used in order for us to analyse the performance and design of the Website and to detect errors. These cookies also enable us to recognise that you have visited the Website before, which sites on the Website that visitors visit most frequently and how much time visitors spend on the Website. These cookies may be automatically enabled and can be managed to your preferences through your browser settings. The purpose of these cookies is solely to improve the performance of the website and your experience.

Advertising cookies – These cookies are used to track your visit across websites to display ads that are relevant and engaging for you as a user. These cookies may be automatically enabled and can be managed to your preferences through your browser settings.

We also use cookies from third parties. This means that third parties have created these cookies and the cookies are set on your device via our Website. We do this to be able to measure and follow performance of advertisements with tools such as Google Analytics.

INFORMATION ABOUT OUR COOKIES

We use the following cookies for the purposes set out below:

Type of cookie	Cookie name	Purpose	Duration
Advertising	_fbp	Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers	3 months.
Performance	_gat_UA-137498122-1	Used by Google to throttle request rate.	When the session ends.
Performance	_gid	Used by Google to distinguish users.	When the session ends.
Performance	_ga		2 years.
Functionality	wordpress_logged_in	Used by Wordpress to indicate when you are logged in, who you are and to keep you logged in.	When the session ends.

INFORMATION ABOUT THIRD-PARTY COOKIES

We allow the use of the following third-party cookies for the purposes set out below:

Type of cookie	Domain name	Cookie name	Purpose	Duration
Functionality	.ads.linkedin.com	lang	Session-based cookie used for Sign-in with LinkedIn and/or for LinkedIn's follow feature and language settings for LinkedIn.	When the session ends.
Advertising	.atdmt.com	ATN	This cookie carries information about how the end user uses the website and any advertising that the end-user may have seen before visiting the said website.	2 years.
Advertising	.atdmt.com	AA003	This cookie carries information about how the end-user uses the website and any advertising that the	3 months.

			end user may have seen before visiting the said website.	
Advertising	.facebook.com	fr	This cookies from Facebook are set for advertisement purposes using the Facebook ID and Browser ID.	3 months.
Functionality	.linkedin.com	bcookie	This cookie is used by LinkedIn to recognize a secure Browser ID. It is set with LinkedIn's share buttons and ad tags.	1 year.
Functionality	.linkedin.com	lang	Session-based cookie used for Sign-in with LinkedIn and/or for LinkedIn follow-feature and language settings for LinkedIn.	When the session ends.
Advertising	.linkedin.com	lidc	Used by LinkedIn for routing from Share buttons and ad tags.	1 day.
Advertising	.linkedin.com	UserMatch History	Used by LinkedIn for statistic regarding LinkedIn ads.	6 months.
Advertising	.twitter.com	personalization_id	Used by Twitter for integration and sharing capabilities for social media.	2 years.
Advertising	.www.linkedin.com	bscookie	Used by LinkedIn for identifying a secure Browser ID.	1 year.

YOUR CONSENT TO COOKIES

By clicking "OK" on our cookie banner on the Website you consent to the use of cookies.

The personal data processing that occurs through cookies is based on your consent as a legal ground for processing. This means that you have a choice to allow or deny some or all of the cookies, except for strictly necessary cookies. Most web browsers also allow you to manage your cookie preferences. You can set your browser to refuse cookies or delete certain cookies. In general, you should also be able to manage similar technologies by using your browser's preferences.

You can review or remove cookies that have already been set through your web browser. The way you can do this usually differs from one web browser to another. Most web browsers have published instructions on how to manage cookies.

Since cookies are always set to the device and browser you use to visit the Website, you will need to separately manage cookies on all the different devices and browsers you use to visit the Website.

Please note that if you choose to block cookies, the functionality of the Website may be affected.

If you want to read more about your rights or how we process your personal data, please read our Privacy Policy [here].

CONTACT US

If you have any questions or comments about our use of cookies, please contact us at hello@epicenterstockholm.com.
