

# PRIVACY POLICY FOR EPICENTER

## 1. GENERAL INFORMATION

- 1.1 EP Center Holding AB, company registration number 556919-8665, having its registered address at Malmskillnadsgatan 44a, 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

- Purpose: To provide our services to you as a member.
- Lawful basis: The performance of a contract.
- Categories of personal data processed: Name, address, phone number, E-mail address, profession company, including organization number or personal identification numbers, billing address, IP address and MAC address when using our network.

If you choose to create a user account, we will also process your username and password.

We process personal identification numbers on the basis of the importance of a secure identification.

- Retention period: 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.

## 2.2 **Members**

- Purpose: To maintain the customer relationship with you.
- Lawful basis: Legitimate interest. Our legitimate interest is maintaining a good customer relationship with you, providing you with information relevant to your use of the Services, improving and further developing the Service.
- Categories of personal data processed: Name, address, phone number, E-mail address, profession company, including organization number or personal identification numbers, billing address, IP address and MAC address when using our network.

If you choose to create a user account, we will also process your username and password.

We process personal identification numbers on the basis of the importance of a secure identification.

- Retention period: 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.

2.3 Epicenter needs the above information in order to fulfill 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.

## 2.4 **Members**

- Purpose: To fulfil our obligations under the Bookkeeping Act (1999:1078)
- Lawful basis: The performance of a contract.
- Categories of personal data processed: Name, address, phone number, E-mail address, profession company.

If you choose to create a user account, we will also process your username and password.

- Retention period: For accounting information that 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.

## 2.5 **Guests**

- Purpose: To provide our Services to you as a guest, and to be able to search for a member or meeting referred to.
- Lawful basis: The performance of a contract.
- Categories of personal data processed: Name, e-mail address, phone number (optional), IP address, MAC address and other technical data about you when accessing the Services and using our network.
- Retention period: 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.

2.6 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.

## 2.7 **Guests**

- Purpose: To maintain the relationship with you as a guest.
- Lawful basis: Legitimate interest. Our legitimate interest is 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.
- Categories of personal data processed: Name, e-mail address, phone number (optional), IP address, MAC address and other technical data about you when accessing the Services and using our network.
- Retention period: 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.

## 2.8 **Guests**

- Purpose: To fulfil our obligations under the Bookkeeping Act (1999:1078)
- Lawful basis: To fulfil a legal obligation.
- Categories of personal data processed: Name, address, phone number, E-mail address, profession company.
- Retention period: For accounting information that 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.

## 2.9 Handling requests

- Purpose: Handling requests via our website or e-mail.
- Lawful basis: Legitimate interest. Our legitimate interest is to handle requests from possible customers and others via the contact form on our website, as well as via e-mail.
- Categories of personal data processed: Name, phone number, E-mail address, profession company, message.
- Retention period: 12 months after the request.

## 2.10 Marketing and newsletters

- Purpose: 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.
- Lawful basis: Consent. You can at any time withdraw your consent for the processing by unsubscribing to our newsletter.
- Categories of personal data processed: Name and e-mail address.
- Retention period: 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.

## 2.11 Feedback and security maintenance

- Purpose: To ask for your feedback and opinion regarding our Services from time to time, and 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.
- Lawful basis: Legitimate interest. Our legitimate interest is 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.
- Categories of personal data processed: Name and e-mail address.
- Retention period: For members, we will process your personal data starting from when you become a member and then up to 12 months after you

terminate your membership. For guests, we will process your personal data for 12 months after the visit.

### **3. DISCLOSURE OF PERSONAL DATA**

#### **3.1 Transfer of personal data within Epicenter's group company**

3.2 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.

3.3 The aim is that you as a member should be free to visit other Epicenter buildings without reregistering. 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.

#### **3.4 Transfer of personal data to third parties**

3.5 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 4 on our behalf in accordance with a data processing agreement and in accordance with our instructions.

3.6 Our data processors are:

- Netsuite, providing a cloud-based ERP-system.
- Nexodus, providing software for managing co-working.
- Pipedrive, providing a CRM-system.
- HubSpot, providing an AI-powered customer platform.
- Confetti, providing a service for managing events.
- Get accept, providing a digital sales room platform.

#### **3.7 Transfer of personal data to third countries**

3.8 In case Epicenter chooses to hire suppliers outside the EU/EEA, there is either a Commission decision that the third country in question ensures an adequate level of protection, or appropriate safeguards, such as standard contractual clauses. You can acquire further information regarding the transfer by contacting us.

3.9 We transfer personal data to third countries outside the EU/EEA in the following cases:

- Via Netsuite (Oracle), to the United States. The transfer is based on an adequacy decision since Oracle is certified to the Data Privacy Framework.
- Via Nexodus, to the United Kingdom. The transfer is based on an adequacy decision between the UK and EU.
- Via Pipedrive, to the United States. The transfer is based on an adequacy decision since Pipedrive is certified to the Data Privacy Framework.
- Via HubSpot, to the United States. The transfer is based on an adequacy decision since HubSpot is certified to the Data Privacy Framework.

3.10 **Links to other websites**

3.11 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. YOUR RIGHTS

4.1 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".

### 4.2 **Right to withdraw consent (Article 7.3 GDPR)**

4.2.1 If you have given your consent to us for a specific processing operation, you may withdraw all or part of the consent you have given at any time, with effect from the date of withdrawal.

### 4.3 **Right to access (Article 15 GDPR)**

4.3.1 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. The right to obtain a copy of your personal data does not mean that you always have the right to obtain *the document* containing your personal data. For any additional copies requested by you, we may charge a reasonable fee based on administrative costs.

#### 4.4 **Right to rectification (Article 16 GDPR)**

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

#### 4.5 **Right to erasure (Article 17 GDPR)**

4.5.1 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;

4.5.2 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.

#### 4.6 **Right to restriction (Article 18 GDPR)**

4.6.1 In some cases, you may request that Epicenter limit the processing of your personal data, for example if you do not believe that your personal information processed by us is accurate.

#### 4.7 **Right to data portability (Article 20 GDPR)**

4.7.1 If the processing is based on the legal grounds of consent or fulfillment 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.

#### 4.8 **Right to object**

4.8.1 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 defense of legal claims.

4.8.2 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 optout 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.

#### **4.9 Right to lodge a complaint (Article 77 GDPR)**

4.9.1 If you have any complaints about our processing of your personal data, you have the right to lodge a complaint with the Swedish Authority for Privacy Protection ([www.imy.se](http://www.imy.se)).

### **5. COOKIES**

5.1 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](#).

### **6. CONTACT INFORMATION**

6.1 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](mailto: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 about the processing of your personal data yourself.

### **7. LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY**

7.1 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/dataprotection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/dataprotection/bodies/authorities/index_en.htm).

### **8. NOTICE OF CHANGES TO THE PRIVACY POLICY**

8.1 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.

### **CONTACT US**

If you have any questions or comments about our use of cookies, please contact us at [hello@epicenterstockholm.com](mailto:hello@epicenterstockholm.com).