

Greater Than's Privacy Policy for visitors, subscribers of newsletters, job seekers etc.

Greater Than AB with business registration no: 556965-2885, at Karlavägen 60, 114 49 Stockholm and its subsidiaries (hereinafter referred to as "GT", "we" or "us"), takes personal privacy seriously and therefore provides this privacy policy (hereinafter "Privacy Policy") to inform you on how GT in its capacity as a personal data controller process your personal data when you are visiting and register your personal data on GT's website, when you become a subscriber of our newsletter, when you are sending a message to GT (on SLACK, e-mail etc), when you become a shareholder of GT and when you're applying for a job at GT (collectively referred to as "Service" or "Services"). Please note that this Privacy Policy applies regardless of whether you are using a computer, mobile phone, tablet or other device to access GT's Services.

1. Who collects your Personal Data?

- 1.1 GT is the personal data controller responsible for the personal data processed under this Privacy Policy.

2. What is Personal Data?

The personal data covered by this Privacy Policy is such personal data that you provide to GT in connection with the use of the Services and the products GT is offering as described in this Privacy Policy, such as, for example; your name, address, email address, phone number, your payment information, car registration number etc which may be linked to you as a natural person ("Personal Data"). Information which cannot direct or indirectly be associated with you is not Personal Data.

3. What type of Personal Data does GT collect, process and store, and for what purpose?

GT collects, processes, and stores the following Personal Data in structured material (for example in databases, customer management systems, IT-systems etc) and in unstructured material (for example on web pages, in documents, in e-mails, social media, articles) and in electronic form and in paper form for the situations described below:

3.1 Register on GT:s website

- 3.1.1 GT will collect, process and store the following Personal Data of you when you register yourself on GT: s website www.greaterthan.eu to contact us, to download content etc:

Your name, title, address, employer, e-mail address, telephone number, country, IP-address.

3.1.2 For what purposes do GT collect, process and store your Personal Data when you as a visitor register yourself on GT's website?

- a) To provide you with the Service that you request or the function you wish to make use of on the website.
- b) For statistical purposes
- c) For administrative issues
- d) For marketing purposes
- e) Improve and develop the Service and products GT is offering.
- f) To develop new services and products
- g) For sales purposes

3.1.3 How do GT gain access to your Personal Data as a visitor registering on GT's website?

The Personal Data that GT processes about you is collected from you when you register your name, e-mail address etc on our website. We can also from time to time collect, complete and process Personal Data from other sources, for example register from governmental agencies or other private and public register such as partners, advertising networks, network providers or other partners which helps us understand user activities, your preferences or to improve and personalize the Services.

3.1.4 On what legal basis do GT process your Personal Data as a visitor on our website?

GT's legal basis for processing Personal Data described in point 3.1.2 d) is based on your consent. GT needs your consent to be able to contact and send you marketing material. You have the right to withdraw your consent regarding this situation at any time. Please see point 10.1- 10.3 in the Privacy Policy regarding how to withdraw your consent.

GT's legal basis for processing Personal Data described in point 3.1.2 a-c), e-g) is based on legitimate interest, our interest in informing you and provide you with the Services and functions on our website, to create statistical material, for doing administrative issues, to Improve and develop the Service and products GT is offering, for sales purpose and to develop new services and products outweighs the interest of you in not having your Personal Data processed for these purposes.

3.2 **Subscriber of GT's newsletter**

3.2.1 GT will collect, process, and store the following Personal Data of you when you subscribe to our newsletter:

- Name (first name and last name)

- Company email-address

3.2.2 For what purposes do GT collect, process and store your Personal Data when you become a subscriber of GT's newsletter?

- a) To be able to give you the latest updates and news
- b) For marketing purposes
- c) For statistical purposes
- d) For administrative issues
- e) For sales purposes

3.2.3 How do GT gain access to your Personal Data as a subscriber of GT's newsletter?

The Personal Data that GT processes about you is collected when you register your name, e-mail address etc on our website.

3.2.4 On what legal basis do GT process your Personal Data as a subscriber of GT's newsletter?

GT's legal basis for processing Personal Data described in point 3.2.2 b) is based on your consent. GT needs your consent to be able to contact and send you, our newsletter. You have the right to withdraw your consent regarding this situation at any time. Please see point 10.1- 10.3 regarding how to withdraw your consent.

GT's legal basis for processing Personal Data described in point 3.2.2 a, c-e) is based on legitimate interest, our interest as a supplier in informing you and provide you with news and updates to GT's products, Services in a newsletter to create statistical material and for doing administrative issues and for sales purposes outweighs the interest of you in not having your Personal Data processed for these purposes.

3.3 Sending messages

3.3.1 GT will collect, process and store for example the following Personal Data of you when you are sending a message to GT (e.g. an e-mail, a SLACK message).

Depending on the purpose of the message and who the sender is, GT will in certain cases only collect parts of the following Personal Data of the sender.

- Name, address, postal code, city, country
- Title
- E-mail address & telephone number
- Website
- Employer's name, registration number,
- A score related to your driving
- Payments, invoices, annual reports,

- CV
- Other Personal Data related to you as using GT:s products and Services etc.
- Etc.

3.3.2 For what purposes do GT collect, process and store your Personal Data when you are sending a message to GT?

Depending on who the sender is and the purpose of the message, GT will in some cases only collect Personal Data for parts of the following purposes:

- a) To fulfil the agreement GT entered with you
- b) For fulfilling GT´ s obligation under law or other statute
- c) To provide and administer the function you as a visitor wants to use on our website
- d) For payment and accounting purposes
- e) For invoicing you as a customer
- f) To check if you as a customer have any payment defaults and make a credit check
- g) To ensure customer recognition
- h) For risk calculation, risk management, analyses, business- and method development
- i) For auditing, and accounting purposes
- j) For claim matters
- k) To personalize and improve your experience of the product and/or Service.
- l) To marketing and sales of our products
- m) To inform you as a customer regarding updates of the products and Services and our policies.
- n) Improve and develop the existing products and/or Services.
- o) To develop new services and products
- p) Analyse your usage of our products and Services and ensure the technical functionality of the product and Service.
- q) Prevent usage of the product in violation of the terms of the customer agreement
- r) Forestall and investigate misuse of the product and fulfil obligations in accordance with the law
- s) For confidentiality, administrative, information and education issues,
- t) For quality works, statistical purposes, security reasons
- u) for business developments, for market analyses
- v) handling complaints
- x) For payment defaults by making a credit check
- y) For making automate decisions to determine whether you as a driver have a smart driving pattern.
- z) For recruitment purposes
- å) For dispute resolution

3.3.3 How do GT gain access to your Personal Data?

The Personal Data that GT process about you is collected when you are communicating with GT.

3.3.4 On what legal basis do GT process your Personal Data when you are sending a message to us?

GT's legal basis for processing Personal Data described in point 3.3.2 a), c)-k), m)-n), p)-q), s), v)-y), å) is based on our **contract** we entered with you.

GT's legal basis for processing Personal Data described in point 3.1.2 b), i), r), x) is based on **the law** (e.g. The Credit Information Act, the Accounting Act etc).

GT's legal basis for processing Personal Data described in point 3.1.2 c), l), o), t), u), z is based on our **legitimate interest** which outweighs the interest of you in not having your Personal Data processed for these purposes.

3.4 Shareholders of GT

3.4.1 GT will collect, process and store the following Personal Data of you when you become a shareholder of GT:

- Name,
- Address,
- Postal code, city, country
- E-mail address
- Company name, registration number
- Trading venue,
- Name of acquired financial instruments, transaction date, volume, price, currency,
- Any close relative to the shareholder,
- Number of shares in GT,
- Share of capital & votes

3.4.2 For what purposes do GT collect, process and store your Personal Data when you are a shareholder of GT?

- To give you shares in GT in accordance with our agreement.
- To fulfil the law (MAR & ABL, Svensk kod för bolagsstyrning, etc)

3.4.3 How do GT gain access to your Personal Data?

The Personal Data that GT process about you is collected when you buy a financial instrument in GT.

3.4.4 On what legal basis do GT process your Personal Data when you are a shareholder of GT?

GT process Personal Data in incoming with the legal base; law (MAR, ABL and Svensk kod för bolagsstyrning) and to fulfil the agreement between us.

3.5 Jobseekers

3.5.1 The following Personal Data of you as a jobseeker will GT collect, process and store:

- Name, address, postcode, city, country
- Title & role
- Application documents (such as your CV, personal letter, grades, references etc)
- Grades and references
- E-mail address and telephone number
- Salary, eventual bonus and pension expectations
- Social security number
- A picture of you
- A videotaping of you if you're visiting our office
- Information/judgements about you from your references
- Eventual test results from personality test
- Other information which GT need from you as a jobseeker

3.5.2 For what purposes do GT collect, process and store your Personal Data as a jobseeker to GT?

- a) To be able to complete the recruitment process and hire you. GT process the Personal Data you share with us, such as your application and your references, and GT evaluate and select candidates in the process. Furthermore, in some cases GT collect health information, background checks and references. Sometimes health checks need to be done before employment and continuous health checks throughout the employment may occur in certain positions.
- b) Saving your Personal Data after the application process is completed
- c) To make you participate in a personality test
- d) Processing and search for you in a competence database
- e) Collecting information of the jobseeker in social media
- f) Collecting information about the jobseeker from references
- g) For recruitment administrative purposes
- h) For security and confidentiality issues,
- i) For quality works and for statistical purposes.
- j) For possible recruitment of you in the future (which require your consent)

3.5.3 How do GT gain access to your Personal Data as a jobseeker?

Most of the Personal Data that GT process about you is collected when you are applying for a job at GT and when we contact your references. GT only ask for your Personal Data that GT needs to have in order to fulfil the recruitment process. Personal Data that you provide GT and that GT do not need for any of the purposes that we process personal information for is deleted promptly. If we tend to keep your Personal Data during a longer time we will ask for your permission. If

GT process such information about you to any other extent than described in this Privacy Policy, GT will ensure that we are entitled to do so by law and that you are informed of the processing.

3.5.4 On what legal basis do GT process your Personal Data as a jobseeker?

GT's legal basis for processing Personal Data described in point 3.6.2 b-d), j) is based on your consent. You have the right to withdraw your consent regarding these situations at any time. Please see point 10.1- 10.3 regarding how to withdraw your consent. If you unsubscribe to our marketing communication, we will not process your personal data for this purpose anymore.

GT's legal basis for processing Personal Data described in point 3.6.2 a) is based on the contract GT will entering with you.

GT's legal basis for processing Personal Data described in point 3.6.2 e-i) is based on our legitimate interest to handle you job application which outweighs the interest of you in not having your Personal Data processed for these purposes.

3.6 Information about your use of the Services

In addition to the information you provide to GT, we may also collect information about your use of the Services. GT may, for example, collect:

- Log information:

These Personal Data we register for GT's and our visitors, shareholders and job seekers safety. This information is used only to detect and counter irregularities and sabotage as well as in case of serious suspicion of unfair or criminal behaviour or a serious suspicion of using the IT equipment in violation of the GT's rules.

GT is logging in the following situations for security reasons:

- k) logging when you are using our Service
- l) logging your e-mail
- m) logging when you as a user of our Services are connecting to a network
- n) video surveillance of the office (when you're visiting our office)

GT also collect data for statistical purposes through the Google Analytics service or similar systems (system created by ourselves or by other such as AppFlyer, Microsoft etc) such as when and for how long you use the Products, search terms you enter by the Products, and all information stored in cookies that we have installed on your device for the purpose of facilitating the functionality of the web pages.

- Geographical information

When using the Google Analytics service or similar system, the region and country of the IP address are retrieved for statistical purposes.

- Other information

Other information about your use of the Services, such as the programs and services you use, and how you interact with content offered by GT for the purpose of developing our Services and products.

3.7 Information from third party sources

GT can receive information about you from public and private actors (in accordance with laws and regulations) which we can combine with other data we receive from or about you. GT may also receive information about you from third party social networking services when you choose to connect to such services.

4. For how long time does GT store your Personal Data?

GT will only store your Personal Data for as long as we need to provide our Services and to you and no longer than permitted under GDPR regarding the storage and screening of Personal Data or as evident from any statutory obligation to store the information for a longer period of time. GT continuously evaluates the length of time required for different types of data. When Personal Data is no longer needed, GT will delete or anonymize your data. You withhold the right to contact us if you don't want your Personal Data to be used for direct marketing by contacting us on info@greaterthan.eu.

5. What are "cookies" and how does GT use them?

A cookie is a small text file containing a unique identification number that is transferred from a website to the hard drive of your computer. This unique number identifies your web browser to GT's computers whenever you visit GT's websites.

The use of cookies is an industry standard, and cookies are currently used on most major websites. Most web browsers are initially set up to accept cookies. If you prefer, you can reset your browser to notify you when you have received a cookie. You can also set your browser to refuse to accept cookies altogether.

While GT does not require you to use cookies, keep in mind that certain services will not function properly if you set your browser to refuse all cookies. To help serve you better, GT generally uses cookies to identify return visitors. Cookies let us remember your web browser so we can provide personalized Services. Cookies also allow us to identify GT members who are returning to the site.

For more information about how we use cookies on the GT's websites, please see our Cookie Policy.

6. Is there any transfer of your Personal Data to third parties?

6.1 GT will not sell, exchange or license any Personal Data about you beyond what is being stated in this Privacy Policy, if we are not obliged by law due to a demand by a

governmental agency, court decision or if we received your consent to do so. Companies belonging to the GT Group may process Personal Data in accordance with General Data Protection legislation and for the purposes stated in this Privacy Policy. Your Personal Data will be handled by authorized personnel within the GT Group to the extent required for the processing. The Personal Data will never be available to all employees of GT, but only to a limited number of authorized persons who need access to the Personal Data to perform their tasks. GT also use external parties to help us process your Personal Data on our behalf (Personal Data processor). When GT hire Personal Data processors, we always ensure by agreement that your Personal Data is protected in an appropriate manner and processed in accordance with current data protection legislation.

6.2 By using the Services your Personal Data may be collected, processed, stored and transferred by GT to the following authorities, partners and suppliers:

- a) Partners: GT may need to share your information with partners to GT in order to provide our Services to you.
- b) Social Media: Such as Facebook, Instagram, LinkedIn, Twitter etc. If you contact GT via social media your Personal Data will also be collected and processed by these companies, in accordance with their data protection information.
- c) Service providers and subcontractors: GT have a number of service providers in order for our activity to function. Suppliers and subcontractors of GT are companies that only have the right to process the Personal Data they receive from GT on behalf of GT, so-called personal data processors. Examples of such suppliers and subcontractors are cloud service companies within Europe (Microsoft), suppliers of financial systems, accounting and bookkeeping companies, software and data storage providers, payment service providers, companies protecting our systems and services and business consultants.
- d) Banks and payment service providers: Payment service providers and banks provide services to you and GT to carry out and administer electronic payments through a variety of payment methods, such as credit cards and bank-based payment methods such as direct debit and bank transfer.
- e) Analytics Services: When you use Analytics Services, your personal information will be shared with Google, HubSpot etc.
- f) Debt collection companies: GT may need to share Personal Data when we sell, or give orders to collect, overdue unpaid debts with a debt collection company.
- g) Advertising partners: For example, our ad partners which help us facilitate tailored advertising: This is when we use third party information to tailor ads to be more relevant to you (also known as interest based advertising).
- h) Marketing Partners: To promote GT with our partners. GT share some Personal Data with these partners where necessary to enable you to participate in GT promotions, including trials or other bundled offers, to promote GT in media and advertising

published on other online services, to help us and our partners to measure the effectiveness of GT promotions such as marketing or sponsorship partners.

- i) Other partner sharing: GT may share personal data with partners within different areas to help us understand and improve the performance of our business, products and partnerships.
- j) Recruitment companies: When you apply for a work at GT we may share your Personal Data with recruitment companies.
- k) Academic researchers: For activities such as statistical analysis and academic study, but only in a pseudonymised format. Pseudonymised data is where your Personal Data is identified by a code rather than your name or other information that directly identifies you.
- l) Authorities and financial institutions: GT may provide necessary information to authorities such as the stock market, banks, IMY, the Swedish Tax Authority or other authorities.
- m) Law enforcement and other authorities: GT may need to share Personal Data with courts and other authorities to comply with a legal obligation, to respond to a valid legal process (such as a search warrant, court order, or subpoena) for our own or a third party's justifiable interest, relating to: national security, law enforcement, litigation (a court case), criminal investigation, protecting someone's safety, preventing death or imminent bodily harm.
- n) Purchasers of GT's business: Where GT sell or negotiate to sell its business to a buyer or possible buyer. In this situation, GT will continue to ensure that your Personal Data is kept confidential. We'll give you notice before your personal data is transferred to the buyer or a different privacy policy starts to apply.

6.3 GT ensures that an adequate level of protection as per the applicable Personal Data legislation is fulfilled upon such transfer of Personal Data to another country and/or organisation. To the extent that GT transfers Personal Data to a non-EU country which, according to the European Commission, does not achieve an adequate level of protection, GT will ensure that the transfer is subject to applicable model clauses or standard safeguards regulations adopted by the European Commission. This also applies, where applicable, to transfer to any Personal Data processor, who processes Personal Data for the purposes stated in this Privacy Policy on behalf of GT.

6.4 Except as provided in this Privacy Policy, GT will not transfer your Personal Data to other third parties.

6.5 GT maintains strict physical, electronic and administrative security measures to protect your Personal Data in accordance with applicable rules. This means that GT regularly review their security and screening policies for the processing of the Personal Data.

7. How does GT protects your Personal Data?

GT takes the necessary and appropriate technical and organizational measures to protect your Personal Data and ensure that General Data Protection regulation are complied with in the handling of your Personal Data. The security measures GT use may include access control, logging, physical security in datahalls, use of firewalls, pseudonymization, encryption, detailed instructions and training for personnel concerning the protection of Personal Data and careful consideration when choosing service providers who process the Personal Data on our behalf. Your information is stored in our protected IT systems and networks. Access is restricted to authorized personnel only.

8. Who is responsible for the information you provide to third parties, the use of social media etc?

8.1 The information you choose to disclose to third parties is not covered by GT's Privacy Policy. You are responsible for the information that you provide to third parties such as on LinkedIn, Facebook and Twitter.

8.2 Some of GT's Services may be accessed through third party services and platforms such as Facebook, Twitter, Google, HubSpot and LinkedIn. You should be aware that GT has no control over, nor is responsible for, the processing of Personal Data by such third parties. GT's Services may also contain links to third party services or websites. If you use such links, you leave GT's Services. GT has no control over such third party services or websites (nor their content), nor is it in any way responsible for these.

8.3 GT can provide features that allow you to share information in your social networks and interact with us.

10. Your right to withdraw your consent

10.1 If you have given your consent for GT's Personal Data processing, you have the right to withdraw your consent (but not retroactively) at any time for the processing of your Personal Data. To this end, it is sufficient to send an email to: info@greatherthan.eu

10.2 Once you have withdrawn your consent, GT will only use the information that have to be processed to provide the Services to you and we will refrain from any other processing.

10.3 You also have the right to request that we remove any Personal Data that may be linked to you as a natural person by destroying or disidentifying them.

11. Changes to this Privacy Policy

GT reserves the right to make changes and/or additions to this Privacy Policy from time to time. For example if there are applicable law changes or if we change our Products in a way that

affects our processing of your Personal Data. You always find the latest version on our website <https://greaterthan.eu/about-us/legal/>.

12. Your rights

- Right of access - You have the right of access to your Personal Data, which means that you have the right to receive confirmation from GT of whether your Personal Data is processed and if so you also have the right to access to your Personal Data at GT by so-called register extracts.
- Right to correction - You have the right to get your Personal Data corrected or supplemented by GT.
- Right to delete - You have the right to have your Personal Data deleted, if
 - o) the Personal Data are no longer necessary for the purposes for which they are processed,
 - p) you withdraw your consent for certain processing and thereafter there is no legal basis for GT to process your Personal Data,
 - q) your Personal Data has been processed illegally, or
 - r) the processing of your Personal Data is not necessary to meet applicable legal requirements, to be able to establish, assert or defend legal claims and / or permitted for archival, research or statistical purposes.
- Right to withdraw your consent - If you have given special consent to GT of processing your Personal Data, you always have the right to withdraw your consent.
- Right to object regarding balancing of interests - When processing of your Personal Data takes place with the support of the legal ground; balancing of interests, you have the right to object to the treatment of your Personal Data at any time. GT will then make a new balance of interests and will only continue the treatment, despite your objection, if we can demonstrate compelling legitimate interests that outweigh your interests.
- Right to object to direct marketing - You have the right to object at any time to the processing of your Personal Data for direct marketing. Then GT will no longer process the Personal Data for such purposes.
- Right to restriction - You have the right to have the processing of your Personal Data restricted if you, among other things, disputes the accuracy of the information, or if you have objected to processing as above, in both cases during the time GT are investigating and checking your request.
- Right not to be subject to an automated decision - If GT have made a decision about you that is based entirely on an automated process with no physical persons involved and the decision has legal consequences or otherwise significantly affects you, you can request that the decision be reconsidered by GT through renewed and individual assessment. This

applies if we cannot demonstrate that an automated decision is necessary to enter into or implement an agreement between you and GT.

- Right to Personal Data portability - You have the right to Personal Data portability, which means that under certain circumstances you have the right to receive such Personal Data about you that you have provided to GT, in order for you to be able to transfer the Personal Data to another personal data controller.
- Right to complain to the supervisory authority - You have the right to complain to the Swedish Authority for Privacy Protection, <https://www.imy.se/kontakta-oss> or other competent supervisory authority in the country in question if you believe that GT process your Personal Data in violation of applicable data protection legislation.

If you wish to exercise any of your rights above, please contact us via info@greatherthan.eu.

13. Contact information

If you have questions about GT's processing of your Personal Data, or if you want to exercise your statutory rights as described above in this Privacy Policy, you are welcome to contact us at the following address and e-mail address:

Greater Than AB
Karlavägen 60
11449 Stockholm
E-mail: info@greatherthan.eu

