

# Greater Than's Privacy Policy for customers in the app

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 as a customer and user of GT's products and services (hereinafter "Product", "Products"). 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 Products.

## 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 Products 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 Customer

- 3.1.1 GT will collect, process and store the following Personal Data of you as GT's customer and user of GT:s Products:

For some of GT's Products, GT collects only part of the following Personal Data:

- Name, address, post code, city, country
- E-mail address and telephone number
- Social security number
- Civil status
- Gender
- The price of your car insurance
- Name of your insurance company where your car is insured
- IP-address
- Registration number of your car
- Your driving pattern (acceleration, speed, breaks, turns and G-forces)
- Your carbon dioxide emissions
- Your driving log
- Your core score for each trip
- Your GPS location and start and end points of your journey
- Annual driven kilometers
- Annual premium of your car insurance
- A credit check of you
- Your bank account and financial information

3.1.2 For what purposes do GT collect, process, and store your Personal Data as a customer of GT?

- To fulfil the agreement GT entered with you as a customer
- For fulfilling GT´s obligation under law or other statute
- To provide and administer the Product GT is offering to you as a customer (e.g. to calculate the price of your car insurance, to analyse your driving during each trip, to reward you for safe and eco driving, to ensure driving safety, to analyse customer driving safety patterns, to send notifications on your smart driving performance)
- To provide services and Products
- To meet your requests as a customer
- For your payment and accounting purposes
- For invoicing
- For work on quality
- To check if you have any payment defaults and make a credit check
- To ensure customer recognition
- For risk calculation, risk management, analyses, business-, operational- and method development
- For auditing, marketing (e.g. create business card for the employee) and accounting purposes
- For claims and insurance matters
- To personalize and improve your user experience of the Product
- To send notifications and messages through e-mail, phone and electronic communication (such as SMS or e-mail)
- To market our Products
- To inform you regarding updates of the Products and our policies
- Improve and develop the Products
- To develop new services and products

- Analyse your usage of the Product and ensure the technical functionality of the Product
- Prevent usage of the Product in violation of the terms of the agreement of the Product
- Forestall and investigate misuse of the Product and fulfil obligations in accordance with the law
- For confidentiality, administrative and education issues,
- For quality works
- For statistical purposes and trends
- For security reasons
- For payment defaults by making a credit check
- For handling complaints
- For market analyses
- For making automate decisions to determine whether you have a smart driving pattern.
- GT need to collect your social security number and registration number of your car to be able to calculate the price of your car insurance by request over the internet.
- By using your social security number and the registration number of your car GT collect information regarding where you live (country and municipality), phone number,, whether you are above 18 years age and currently have a driver's license, a car and car inspection data.

### 3.1.3 How do GT gain access to your Personal Data as GT's customer?

Most of the Personal Data that GT process about you is collected directly from you as a customer, which includes the types of Personal Data that is generated through your use of our Products. GT can from time to time also collect and process Personal Data from other sources such as register from governmental agencies or other private and public register such as partners, advertising networks, network providers or other partners which help us understand user activities, your preferences or to improve and personalize the Product. GT only ask you for the Personal Data that GT need to perform our contractual and statutory obligations towards you and the company you represent.

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. In the event that 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.

### 3.1.4 On what legal basis do GT process your Personal Data as a customer?

GT process your Personal Data in order to perform our obligations to you as our customer. The legal bases on which GT process your Personal Data are therefore part of the contract you entered with GT and also for GT's fulfilment of legal obligations according to law (e.g. The Credit Information Act).

### 3.2 Information about your use of the Products etc

In addition to the information you provide to GT, we may also collect information about your use of the Products on your device in other ways. GT may, for example, collect:

- Log information:

These Personal Data we register for GT's and our customers' 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:

- logging when you are using a customer portal or any other of our services
- logging your e-mail
- logging when you as a customer are connecting to a network of GT

GT also collect data for statistical purposes through the Google Analytics service or similar systems we have created by ourselves or through other companies (by AppFlyer, Microsoft etc), when and for how long you use the Products, search terms you enter by the Products.

- 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 Products, such as the programs and services you use, and how you interact with content offered through a GT Product for the purpose of developing our Products and to determine how we will further develop and prioritise our Products internally.

### 3.3 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. Automated decision making

Automated decisions in accordance with GDPR mean that the decisions are determined without any manual human impact. GT makes decisions about you based on automated decision-making when you are using GT's products. GT determines for example when using the app the distance of your driving and driving behaviour with automated processes through AI. This information might be the foundation of the deciding of your insurance premium. You have the right to contact us in case you are not satisfied with such an automatic decision.

## 5. 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 Products 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](mailto:info@greaterthan.eu).

## 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 and Products your Personal Data may be collected, processed, stored and transferred by GT to the following authorities, partners and suppliers:

- Insurance companies and other partners: GT may need to share your information with insurance companies and other partners to GT in order to provide our Services and Products to you.
- Social Media: Such as Facebook, Instagram, LinkedIn or Twitter etc. If you contact GT via social media your personal information will also be collected and processed by these companies, in accordance with their data protection information.
- 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.

- Analytics Services: When you use Analytics Services, your personal information will be shared with Google.
- Other partner sharing: We may share personal data with partners within different areas to help us understand and improve the performance of our business, products and partnerships.
- Academic researchers: For activities such as statistical analysis and academic study, but only in a pseudonymised format. Pseudonymised data is where your data is identified by a code rather than your name or other information that directly identifies you.
- Companies within GT Group. GT has subsidiaries and offices in other countries such as UK, Singapore, USA, Japan etc. GT may disclose personal data to these subsidiaries and vice versa.
- Authorities and financial institutions: GT may provide necessary information to authorities such as the banks, IMY, the Tax Authority or other authorities.
- 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.
- Purchasers of GT:s business: Where GT sell or negotiate to sell its business to a buyer or a possible buyer. In this situation, GT will 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 Products may be accessed through third party services and platforms such as Facebook, Twitter, Google 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 Products may also contain links to third party services or websites. If you use such links, you leave GT's Products. 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.

## **9. Your right to withdraw your consent**

- 9.1** 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](mailto:info@greatherthan.eu)
- 9.2** Once you have withdrawn your consent, GT will only use the information that have to be processed to provide the Products and we will refrain from any other processing.
- 9.3** 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.

## **10. 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 applicable law changes or if we change our Products in a way that affects our

processing of your Personal Data. Information about any changes and/or additions will be notified to you via our website; [www.greaterthan.eu](http://www.greaterthan.eu).

## 11. 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
  - the Personal Data are no longer necessary for the purposes for which they are processed,
  - you withdraw your consent for certain processing and thereafter there is no legal basis for GT to process your Personal Data,
  - your Personal Data has been processed illegally, or
  - 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](mailto:info@greatherthan.eu).

## 12. 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](mailto:info@greatherthan.eu)