

Privacy Policy

Applicable to TrueSec AB, organisation number 556676-3073.

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Policy for customer privacy and marketing

1. General

This Privacy Policy outlines how TrueSec AB, org. No. 556676-3073, Box 61 FE 533, 751 75 Uppsala, email: privacy@truesec.com, ("TrueSec", "we") collects, uses, discloses and stores your personal data.

1.1 The Privacy Policy is applicable when TrueSec provides services and products related to purchases, customer service matters, and other contact made with TrueSec, such as visits to its website.

1.2 You should always be able to feel safe when you submit your personal data to us. In this Privacy Policy, we want to demonstrate the ways in which we ensure that your personal data is processed in accordance with applicable privacy laws.

2. Data Controller

TrueSec is the data controller for TrueSec's processing of your personal data. We are responsible for the processing of personal data according to applicable legislation.

3. When do we collect and process your personal data?

3.1 When you visit our website or purchase our services, products, training programmes, event tickets, or contact us for information or services, we may collect personal data about you as outlined below:

3.2 TrueSec collects and processes personal data about you when you visit TrueSec websites, make a purchase on TrueSec websites, use TrueSec support, or attend an event organised by TrueSec. The information collected about you at the time of booking or purchase is required for entering into the agreement with TrueSec and to enable TrueSec to provide its services and offers.

3.3 Information that TrueSec collects about you relates to how you interact with the TrueSec website, your purchase history, what events you attended, and what offers you were interested in through reading an email or clicking on a link.

3.4 The personal data is stored in our CRM, invoice, email, selected database and web analytics systems.

4. What personal data do we process?

4.1 For customers of TrueSec

TrueSec collects and processes personal data about you as a customer who purchases our services, products, events or training programmes, or uses our services and products:

- First and last name
- Email
- Telephone number
- Organisation number
- Invoice address
- Payment details
- Order history
- Professional title
- Allergies (this entry is deleted from the registry no later than 7 days after the event has passed)

4.2 For those who show an interest by filling in our online form

TrueSec collects and processes the following personal data about you:

- First and last name
- Email
- Company
- Professional title
- Invoice address
- Telephone number
- Interest area, i.e. what offers you are interested in and which of our events you signed up for.

4.3 For subscribers of our newsletter

TrueSec collects and processes the following personal data about you:

- First and last name
- Email
- Interest area
- Information about how you interact with our newsletters, what deals you are interested in, and what links you click on.

4.4 For visitors of our website

TrueSec collects and processes your IP address and data regarding your usage of TrueSec websites. To read about how website usage is tracked, please refer to section 13 about Cookies. We collect the following information about visitors to our website:

- Which pages are visited
- Time spent on each page
- Which links you click on
- Which page you leave when you view a new one
- Which browser you use

5. Why do we process your personal data?

We only use personal data in accordance with the original purpose for which it was collected, unless consent has been obtained.

5.1 For customers of TrueSec

TrueSec processes your personal data in order to:

- Comply with our obligations to you as a customer, such as administration, processing and execution of purchase, invoicing and provision of support.
- Managing your customer account for accounting and invoicing purposes.
- Be able to provide customer care and customer service, such as answering questions and correcting erroneous data.
- Be able to communicate with you, provide information, offers, event invitations and targeted marketing via email, sms and telephone regarding TrueSec products and services, and request your participation in voluntary marketing surveys.
- Continually manage customer relationships and provide our services.
- Provide relevant information and customised offers in newsletters, on the internet and social media.
- Improve our customer offering with regards to the development of services, products and features.
- Follow applicable legislation, such as accounting laws.
- Improve our customer offering with regards to the development of services, products and features:
 - to be able to contact you when problems arise in connection with orders or the execution of services

5.2 For you who subscribed to our newsletter and showed an interest by filling in our online form

TrueSec processes your personal data in order to:

- Be able to provide customer care and customer service, such as answering questions and correcting erroneous data.
- Be able to communicate with you regarding special offers, event invitations, and targeted marketing of TrueSec products and services via the internet, email, sms and social media.
- Provide relevant information and customised offers in newsletters, on the internet and social media.
- Troubleshooting and optimising technology.

Data can also provide a basis for market and customer analyses, market research and statistics related to shown interest in TrueSec goods, services and events.

5.3. For visitors of our website

TrueSec processes your personal data in order to:

- Analyse how you behave on our website in order to make improvements in relation to user experience and user friendliness.
- Analyse which of our pages and services/products are most interesting to visitors.

6. Legal basis for TrueSec's processing of your personal data

We process your personal data based on legal grounds as outlined below.

6.1 Fulfilment of contractual obligation: If you are a customer, TrueSec processes your personal data in order to fulfil the agreement with you as a customer, to carry out bookings, purchases, and simplify administration and order history.

6.2 Consent: For information collected via cookies and your email address, we lean on consent as a legal basis. Regarding the email address, consent is obtained through the acceptance of our privacy policy in order to become a subscriber. Regarding cookies, consent is obtained through a pop-up banner that informs visitors about our use of cookies.

6.3 Balance of interests: In order to send you offers about our services, products and events as well as to make limited segmentation of customers according to geography or knowledge area (for example), for which a limited amount of personal data processing is based on a balance of interests. TrueSec does not process sensitive personal data based on a balance of interests and does not carry out any processing that constitutes profiling based on a balance of interests.

6.4 Legal obligation: In some cases, TrueSec may have a legal obligation to process your personal data. This applies, for example, to the processing of personal data in order to meet the requirements of the [accounting act](#).

7. Profiling

7.1 TrueSec may process your personal data through profiling. If you are a visitor, customer or newsletter subscriber, the following information is analysed:

- how you use TrueSec websites
- which of our goods, services and offers you show an interest in
- which newsletters you interacted with and events you signed up for
- purchase data in order to provide targeted personal offers
- to invite you to events we believe you would be interested in.

7.2 You may at any time oppose the processing of personal data through profiling. You can do this by calling TrueSec on +46 (0)8 10 00 10, by emailing privacy@truesec.com, or by sending your request to TrueSec AB, Box 61 FE 533, 751 75 Uppsala, Sweden. Once we receive your notification, we will cease to process your personal data for this purpose without undue delay.

8. How long do we store your personal data?

8.1 Personal data is stored only as long as necessary for the purposes for which it was collected in accordance with this Privacy Policy. TrueSec may store the data longer if necessary in order to comply with legal requirements such as [the accounting law](#).

8.2 Disposal policy

Your personal data is stored in our CRM and invoicing tools, as well as data analysis tools as long as you have purchased, interacted or show an interest in TrueSec or until we receive a withdrawal of consent or objection to processing from a customer. See point 12.

In our selected email system, we store data about our customers for a maximum of 24 months after the customer last completed a purchase or otherwise interacted with TrueSec. The data is then deleted from the system.

9. Who do we disclose personal data to?

9.1 Third parties

TrueSec may disclose personal data to third parties, such as TrueSec Group companies, partners and providers of communication services. TrueSec never sells personal data to third parties.

Third parties to whom TrueSec provides customer data may only use the data in order to:

- sell and market TrueSec and Group companies' services and products
- deliver services related to TrueSec's agreement with you as a customer

These third parties include:

- Financial system (Visma) for invoices and payment
- Our advertising agency (Pineberry)
- Other systems: Handling of sales contacts in the Trello collaboration tool, and event registrations on Eventbrite
- Our selected web analytics system (Google Analytics)
- Our selected data analysis system (APSYS)
- Our web host (Pigment)

9.2 To comply with applicable legal or governmental requirements, to safeguard TrueSec's legal interests, or to detect, prevent or be attentive to fraud and other security or technical issues, TrueSec may disclose personal data if necessary.

9.3 Countries outside the EU/EEA

TrueSec may transfer data to countries outside the EU/EEA if its suppliers are located there. If data is transferred outside the EU/EEA, TrueSec takes the

necessary measures to ensure that the data is protected and lawfully transferred to the non-EU/EEA country.

10. Changes to TrueSec's Privacy Policy

TrueSec has the right to make changes to the Privacy Policy at any time and will thereafter make the new version available on its website. If the changes require your consent, it will be obtained before the changes come into effect.

11. Your rights regarding the storage of personal data at TrueSec

11.1 TrueSec is responsible for processing your personal data in accordance with applicable laws.

11.2 At your request or on its own initiative, TrueSec may correct, anonymise, delete or supplement personal data that is incorrect, incomplete or misleading.

11.3 You have the right to request:

- Access to your personal data, such as registry extracts or copies of your personal data.
- Once per calendar year, you have the right to obtain a registry extract which shows the personal data registered about you, the purpose of the processing, and to whom the data has been or will be disclosed. Also, information regarding the source of the data retrieval, the occurrence of profiling, and the predicted period for data storage. You also have the right to obtain data that appears in the registry extract in accordance with your rights listed in this paragraph.
- Correction of your personal data at your request.
- Deleting your personal data. If it is no longer necessary for the purpose it was collected, for example legal requirements that prevent us from immediately deleting your personal data in accordance with, for example, accounting and tax laws.
- Restrictions on processing if you believe your data is incorrect and you have requested a correction.

11.4 Data Portability. You may, under certain conditions, extract and transfer your personal data in a structured, widely used and machine-readable format to another personal data controller.

11.5 You have the right to object to the processing of personal data carried out on the basis of a balance of interests. In such cases, TrueSec will only continue the processing if there are legitimate reasons that weigh heavier than your interests.

11.6 If you do not wish TrueSec to process your personal data for direct marketing purposes, you have the right to object to the processing by sending an email to

privacy@truesec.com. When we receive your objection, we will cease to process your personal data for marketing purposes.

11.8 You have the right to file a complaint regarding the processing of your personal data to the Swedish Data Protection Authority.

11.9 You are entitled to revoke your consent to the processing of personal data at any time, with immediate effect and without cost. You can do this by calling TrueSec on +46 (0)8 10 00 10 or by sending an email to privacy@truesec.com.

12. Cookies

12.1 What are cookies?

A cookie is a small text file that a website requests to store on your device or computer in order to recognise you the next time you visit the website. The cookie is used to enhance user experience. Information in the cookie is used to follow a user's browsing activities.

There are two types of cookies:

- **Permanent cookies** store a file on your device and enable you to use the site and access different features.
- **Session cookies** are used when you visit a website. A session cookie is sent between your computer and our web server to facilitate navigation. The cookie is erased when you leave the website.

For more information about cookies, [please visit the Swedish Post and Telecom Authority website](#).

12.2 Our use of cookies on our website

12.2.1 We use permanent cookies and session cookies on our website in order to:

- Measure and analyse visitor flow and navigation on the website to see what visitors appreciate and how they use our web services
- Allow the system to recognise returning users in order to make the user experience as pleasurable as possible.
- Retain the visitor's choice of text size on the website and automatically fill in different form fields so as to facilitate the accessibility of services for the user and his/her visits to our websites.

12.2.2 If you accept session cookies, you can fully appreciate our website.

12.2.3 If you do not accept any cookies, you will not be able to fully appreciate our website; you will only be able to read information and view services, see prices and related information.

12.3 Website analysis tools

We use Google Analytics to understand how you, the visitor, use our website. The following cookies are created when you visit the website:

Permanent cookies:

- `__utma`, differentiates between users and sessions/visits. It is updated at each pageview and expires two years after it is added or last updated.
- `__utmz`, measures traffic sources and navigation on the site (such as the search engine used to enter the site). It expires six months after it is added or last updated.

Session cookies:

- `__utmb`, calculates new sessions/visits. It is updated at each pageview and expires 30 minutes after it is added or last updated.
- `__utmc`, used with "`__utmb`" to understand if a new visit is made to the website (30 minutes of inactivity is counted as a new visit). It expires when the browser is closed.
- `__utmt`, calculates the site speed and expires 10 minutes after it is set.

Cookie	Description	Expires
<code>_ga</code>	Used by GA to distinguish visitors	2 years
<code>_gid</code>	Used by GA to distinguish visitors	24 hours
<code>_gat</code>	Used by GA to limit the frequency of inquiries	1 minute

The information created by these cookies is used to evaluate visitor statistics in order to improve content, navigation and website structure. [Read about Google's privacy policy here.](#)

12.4 Disable the storage of cookies

If you do not want cookies to be stored on your computer, you can turn off the feature in your browser settings. Thus, no cookies will be stored, but note that your personal settings will disappear. Learn how to [remove cookies from web browsers](#).

If you do not want your visits to our website to appear in Google Analytics statistics, you can use an add-on in your browser. See [Google Analytics Opt-out Browser Add-on](#).

[Legal information: The Electronic Communications Act 2003:389 \(Sweden\)](#)

13. Email address management policy

We handle your email address in accordance with our Privacy Policy.

- Your email address will not be sold, distributed or otherwise made available to another company that is not part of TrueSec AB and Group.
- All mailouts are done using technologies that do not show email addresses to other subscribers.
- When subscribing to mailouts such as newsletters, you agree that your personal data (email, company, first name, last name, address, mobile telephone and professional title) may be stored and used by TrueSec for ongoing and targeted direct marketing.
- Data that is submitted through the use of TrueSec's digital services and offers, along with data collected through data analysis tools Google Analytics and APSIS Profile Cloud, can be used to customise content and services, and in direct marketing and advertising.
- In connection with each email, you, the subscriber, have the possibility to unsubscribe from future mailings and erase your personal data from the email system.
- Consent is valid until you, the subscriber, withdraw it. To withdraw your consent, please contact TrueSec by emailing privacy@truesec.com or by calling +46 (0)8 10 00 10.

14. Contact details for TrueSec

Please contact us if you have any questions regarding our Privacy Policy or the processing of your personal data, or to request a registry extract. Our contact details can be found below.

TrueSec AB

Telephone: +46 (0)8 10 00 10

Email: privacy@truesec.com

Address: Oxtorgsgränd 2, 111 57 Stockholm, Sweden