

# Combify's Privacy Policy

Combify cares about privacy and protecting the Personal Data handled by us. All Personal Data is Processed in accordance with Applicable Law. In this Policy we describe how and the purposes for which we use your personal information as well as what lawful basis we use and what measures we take to protect Personal data. We also provide information on how you exercise the rights you have linked to our Processing of Personal data.

## Why and who?

Combify AB Reg. No. (559122-6922) ("**Combify**", "**we**", "**us**", "**our**") is the Controller of all Personal Data listed in this Privacy Policy (the "**Policy**"). In order to be fully transparent regarding where your Personal Data is stored and Processed, we will also provide a list of all our data Processors. This Policy provides information on how we handle Personal Data when you communicate with us, use the Services or visit our website [www.combify.se](http://www.combify.se), [www.map.combify.com](http://www.map.combify.com) (together the "**Functions**").

## The intended recipient of the information provided in this Policy is:

- Users of the Services
- Visitors of our website

## Definitions

"**Applicable Law**" refers to the legislation applicable to the processing of Personal Data, including the GDPR, supplementary national legislation, as well as practices, guidelines and recommendations issued by a national or EU supervisory authority.

"**Controller**" is the company/organisation that decides for what purposes and in what way personal data is to be processed and is responsible for the Processing of Personal Data in accordance with Applicable Law.

"**Data Subject**" is the living, natural person whose Personal Data is being processed.

"**Personal Data**" is all information relating, directly or indirectly, to an identifiable natural person.

"**Processing**" means any operation or set of operations which is performed on Personal data, e.g. storage, modification, reading, handover and similar.

"**Processor**" is the company/organisation that processes personal data on behalf of the Controller and can therefore only process the Personal Data according to the instructions of the Controller and the Applicable Law.

"**The Services**" Combify Construction Map is a digital platform that visualises data connected to planned and ongoing construction projects..

The definitions above shall apply in the Policy regardless if they are capitalised or not.

## Combify's role as a Controller

The information in this Policy covers Personal Data Processing for which Combify is the Controller. As a Controller we are responsible for the Processing for which we decide the purpose of ("the why") and the means for the Processing (what methods, what personal data and for how long it is stored). The Policy does not describe how we Process Personal Data in the role of a Processor - i.e. when we process Personal Data on behalf of our customers.

Combify Construction map is a digital platform that provides visual and text information on planned and on-going construction projects in an area, city or a country. We need to process your information for you to be able to visit the platform, create a user account and to subscribe to one of our payment plans including the free trial, in order to follow the development of one or more construction projects.

## Combify's processing of personal data

We have a responsibility to describe and demonstrate how we fulfill the requirements that are imposed on us when we Process your Personal Data. This section aims to describe:

- That Processing of Personal Data is necessary is for the purpose
- That we have identified the lawful basis for the Processing

## Lawful basis

**Consent** - Combify may process your personal data after you have given your consent to the Processing. Information regarding the processing is always provided in connection to the request of consent.

**Legitimate interest** - Combify may process Personal Data if we have assessed that a legitimate interest overrides the interest of fundamental rights and freedoms of the Data Subject, and if the processing is necessary for the purpose in question.

## For how long do we store your personal data?

We will keep your personal data as long as it is necessary for the purpose for which it was collected. Depending on the lawful basis on which we support the Processing, this may **a)** be regulated in a contract, **b)** be dependent on valid consent, **c)** be stated in legislation or **d)** followed by an internal assessment based on a legitimate interest assessment (LIA). In the list below, we indicate, where possible, the period during which the Personal Data will be stored and the criteria used to determine the storage period.

## Processings

1. **Processing and purpose of Processing:** To register a user account to make it possible for a user to log in and use the Service  
**Personal Data:** Name and email.  
**Source:** Directly from the registered.  
**Lawful basis:** Consent  
**Storage period:** As long as there is a valid consent. Information on how long the consent is valid is provided in connection with obtaining the consent
2. **Processing and purpose of processing:** Communicate in order to effectively help customers with any problems (customer support) and provide relevant information about the Service.  
**Personal data:** Name and email.  
**Source:** Directly from the registered.  
**Lawful basis:** Consent  
**Storage period:** As long as there is a valid consent. Information on how long the consent is valid is provided in connection with obtaining the consent.
3. **Processing and purpose of processing:** Marketing and information initiatives with the aim of maintaining potential customers' interest in the Service.  
**Personal data:** Name and email.  
**Source:** Directly from the registered.  
**Lawful basis:** Consent  
**Storage period:** As long as there is a valid consent. Information on how long the consent is valid is provided in connection with obtaining the consent.
4. **Processing and purpose of processing:** Save information about the Registered who have unsubscribed from information mailings to avoid sending similar unwanted emails in the future.  
**Personal data:** E-mail.  
**Source:** Directly from the registered.

**Lawful basis:** The legitimate interest of complying with applicable law and meeting the wishes of the data subject.

**Storage period:** Two years.

## Your rights

You are the one in control of your Personal data and we always strive to ensure that you can exercise your rights as efficiently and smoothly as possible.

**Access** - You always have the right to receive information about the Processing of data that concerns you. We only provide information if we have been able to verify that it is you that are requesting the information.

**Rectification** - If you find that the Personal Data we process about you is incorrect, let us know and we will fix it!

**Erasure** - Do you want us to completely forget about you? You have the right to be forgotten and request deletion of your Personal Data when the Processing is no longer necessary for the purpose for which it was collected. If we are required to retain your information under applicable law or a contract that we have entered with you, we will ensure that it is processed only for the specific purpose set forth in such applicable law or contract. We will thereafter erase the information as soon as possible.

**Objections** - Do you disagree with our assessment that a legitimate interest for Processing your Personal Data overrides your interest in protecting your privacy? Don't worry - in such case, we will review our legitimate interest assessment. Of course, we add your objection to the balance and make a new assessment to see if we can still justify our Processing of your Personal Data. If you object to direct marketing, we will immediately delete your personal information without making an assessment.

**Restriction** - You can also ask us to restrict our Processing of your Personal Data

- Whilst we are Processing a request from you for any of your other rights;
- If, instead of requesting erasure, you want us to limit the Processing of Personal Data for a specific purpose. For example, if you do not want us to send advertising to you in the future, we still need to save your name in order to know that we should not contact you; or
- In cases where we no longer need the information in relation to the purpose for which it was collected, provided that you do not have an interest in retaining it to make a legal claim.

**Data portability** - We may provide you with the data that you have submitted to us or that we have received from you in connection with a contract that we have entered with you. You will receive your information in a commonly used and machine-readable format that you can transfer to another personal data manager.

**Withdraw consent** - If you have given consent to one or several specific processing(s) of your Personal Data, you have the right to withdraw your consent at any time and thus ask us to terminate the Processing immediately. Please note that you can only withdraw your consent for future processing of Personal Data and not for Processing that has already taken place.

## How you use your rights

You are the one in control of your Personal data and we always strive to ensure that you can exercise your rights as efficiently and smoothly as possible.

Send an email to [legal@combify.com](mailto:legal@combify.com) and we will help you take advantage of your rights.

## Transfer of personal data

In order to run our business, we may need help from others who will process Personal Data on our behalf, so-called Processors.

In cases where our Processors transfer Personal Data outside the EU/EEA, we have ensured that the level of protection is adequate, and in compliance with Applicable Law, by controlling that either of the following requirements are fulfilled:

- the EU Commission has determined that the level of protection is adequate in the third country where the data is processed;
- the Processor has signed up to the EU Commission's standard contract clauses (SCCs) for data transfer to non-EU/EEA countries; or
- the Processor has taken other appropriate safeguards prior to the transfer and that such safeguards comply with Applicable law.

We have entered into Data Processing Agreements (DPA) with all our Processors. The DPA sets out, among other things, how the Processor may process the Personal Data and what security measures are required for the Processing.

We may also need to disclose your personal information to certain designated authorities in order to fulfill obligations under applicable law or legally binding judgements.

## Our processors

5. **Processor:** Stripe  
**Personal data being processed:** Name, payment information, address  
**Instructions:** Stripe helps us process your payment online.
6. **Processor:** Google Analytics  
**Personal data being processed:** Name, e-mail, IP-address  
**Instructions:** Google Analytics helps us track how our customers are using our Service.
7. **Processor:** Google Cloud  
**Personal data being processed:** IP-address  
**Instructions:** Google Cloud provides secure certification of all our services.
8. **Processor:** Mailchimp  
**Personal data being processed:** Name, e-mail  
**Instructions:** Mailchimp helps us send updates and promotional codes to the users.
9. **Processor:** Segment  
**Personal data being processed:** IP-address  
**Instructions:** Segment helps us collect data about user behaviour.

## Security measures

Combify has taken technical and organisational measures to ensure that your Personal Data is processed securely and protected from loss, abuse and unauthorised access.

### Our security measures

**Organisational security measures** are measures that are implemented in work methods and routines within the organisation.

- Internal governance documents (policies/instructions)
- Login and password management
- Physical security (premises etc.)

**Technical security measures** are measures implemented through technical solutions.

- Encryption
- Secure network
- Firewall
- Back-up
- Regular security inspection

## If we don't keep our promise

If you think that we are not Processing your Personal Data correctly, even after you have notified us of this, you are always entitled to submit your complaint to the Swedish Authority for Privacy Protection.



More information about our obligations and your rights can be found at <https://www.imy.se/>  
You can contact the authority via e-mail at: [imy@imy.se](mailto:imy@imy.se)

## **Changes to this policy**

We reserve the rights to make changes to this Policy. In the event that the change affects our obligations or your rights, we will inform you about the changes in advance so that you are given the opportunity to take a position on the updated policy.

## **Contact**

Please contact us if you have questions about your rights or if you have any other questions about how we process your personal information:

[policy@combify.com](mailto:policy@combify.com)