

Last updated: Jan 27, 2020

# **Privacy Policy**

#### Introduction and who we are

This privacy policy will help you understand how we may collect and use your personal information. This policy also describes your rights and how you can use your rights. You can easily contact Medius if you have any questions related to this policy.

References to "Medius" on this site should be considered as references to Medius Sverige AB and all of its subsidiaries and affiliates.

Medius Sverige AB is considered data Controller of your personal data. Medius Sverige AB is a Swedish limited company with registration number 556820-2765, registered office and address at Platensgatan 8, 582 20 Linköping and email info@medius-group.com.

### What personal data do we process and from whom is such data collected?

The type of personal data that Medius processes about you may be:

- your contact details, such as name, address, telephone number, and email address;
- your job title, position including preferences and interests in a professional context and your company's name;
- website traffic information as provided by your web browser such as browser type, language, and the address of the referring website and other traffic information such as IP address:
- website visitor behavior such as which links you click and when;
- any other information that we collect online from you and maintain in association with your account, such as your user name and password;
- any other information that you provide to use when you are communicating with us.

Medius may collect personal data directly from you when you make purchases of products and services, you request support for a product or service, you create a user account, you participate in surveys and evaluations, or when you submit questions or comments to us.

On Medius' websites you can register to access educational content, subscribe to our newsletters, sign up to our events, and fill in a contact request. In general, Medius collects personal data directly from you when you register on our sites or fill out a form. We may also, with your consent, use cookies and other tracking technology when you use our websites to optimise your experience of these.

Cookie policy https://www.medius.com/legal/cookies/

We may also collect information about you from other sources, including publicly available databases or third parties from whom we have purchased data or to whom you have provided your data, and combine this data with information we already have about you. We



may also receive information from other affiliated companies that are a part of our corporate group. This helps us to update, expand, and analyse our records, identify new prospects for marketing, and provide information about our products and services that may be of interest to you.

#### How we use the information we collect and receive

Your personal data may be saved and processed by Medius for the following purposes:

- To answer a contact request or to send you educational content, newsletters, press releases, and similar information or invitations for seminars and similar events to you. Accordingly, if you do not provide the requested personal information, Medius will not be able to respond to a contact request or to send you any newsletters or invitations and information.
- For marketing and market research, as well as basis for Medius' market and customer analyses, business and product development, and statistics
- To personalise your experience (your information helps us to better respond to your individual needs)
- To improve our websites (we continually strive to improve our websites offerings based on the information and feedback we receive from you)
- To allow Medius to provide, maintain, monitor, improve and develop our business and services and to personalise our services for you
- Purpose and lawful basis for the processing
- In accordance with Medius' assessment, the processing is necessary for Medius' legitimate interest to enable our business and in answering a contact request, and administering newsletters, information, and invitations to you in accordance with your wishes to be contacted or to receive requested information, respectively.

In addition, Medius' processing of your personal data for marketing purposes, for market research, for market and customer analysis, business and product development and statistics, is based on a legitimate interest. According to Medius' assessment, the processing is necessary for Medius' legitimate interest to market its products and services, and to analyse and develop its business and operations.

Medius may also use your personal data for the purpose of compliance with applicable laws and protection of our legitimate business interests and legal rights, including but not limited to, use in connection with legal claims, compliance, regulatory, investigative purposes (including disclosure of such information in connection with legal process or litigation).

# How long do we store your personal data?

In general, Medius will only retain your personal data for as long as necessary for the stated purpose, while also taking into account our need to answer queries or resolve problems and to comply with legal requirements under applicable law. This means that we may retain your personal data for a reasonable period after your last interaction with us (normally for three calendar years from your last interaction with us but if you are representing a customer of Medius, we may keep your information for the duration of the contractual relationship and to



the extent permitted also after the end of that relationship for as long as necessary to perform the purpose). When the personal data that we collect is no longer required in this way, we destroy or delete it securely.

Personal data provided in connection with newsletter subscriptions, event registrations, or information requests are stored by Medius until you unsubscribe from the applicable service. However, if you unsubscribe, Medius will continue to process your personal data to the extent necessary to ensure by technical means that no further posting of newsletters, event invitations, educational information, and similar are sent to you. If Medius does not save your personal data in this respect, Medius will not be able to ensure that no further newsletters, invitations, or information will be sent to you. The continued processing of your personal data is, according to Medius' assessment, necessary for the purposes of Medius' legitimate interest in preventing sending of newsletters, information and invitations to you in accordance with your expressed desire.

## **Your rights**

You have the right to request a confirmation from Medius as to whether or not personal data concerning you are being processed and, where that is the case, obtain access to your personal data. You also have the right to request that Medius corrects any inaccuracies in your personal data and that Medius shall erase your personal data or restrict the processing of your personal data. You further have the right, at any time, to object to Medius' processing of your personal data if you believe that Medius has no legitimate interest in processing the personal data or to the use of your personal data for the purposes of direct marketing. You are finally entitled to lodge a complaint regarding Medius' processing of your personal data with a supervisory authority. You can contact Medius for more information about these rights.

## How do we share your personal data?

Ensuring your privacy is important to Medius. We do not share your personal data with third parties except as described in this privacy policy. We may share your personal data with:

- Third-party service providers (for example to email and hosting providers and partners that are administrating webinars or websites or distributing press releases and other information on behalf of Medius and to any other third parties to the extent such disclosure is required to enable products or services to be provided to you and/or our clients);
- Business partners;
- Affiliated companies within our corporate structure; and
- As needed for legal purposes (for example to authorities in accordance with applicable laws and regulations).

Medius may also share your personal data in connection with mergers, acquisitions or divestiture of all or parts of Medius' business, where the acquiring entity, as well as its consultants and Medius' own consultants, may obtain access to data managed by Medius.



When sharing your personal data with third parties we take appropriate technical, organisational and legal measures in accordance with applicable data protection legislation. When required by applicable law, Medius has established Data Processing Addendums with any third party with which your personal data is shared.

#### **Export of personal data**

For personal data collected within EEA, the personal data collected is generally processed within EEA. In cases where Medius exports your personal data outside the EEA, such export is based either on a decision by the EU Commission that the third country in question ensures an adequate level of protection, or on appropriate safeguards to ensure that your rights are protected. Examples of appropriate protection measures are approved code of conduct in the recipient country, standard contract clauses, binding company internal rules, or Privacy Shield.

### Specifics about emails

In cases where an email sent to or from Medius contains personal data, Medius' receipt/dispatch and further processing of such email means that we process personal data. Emails almost always contain personal data because the email address itself is usually considered as personal data. The email may also contain other information that is considered personal data. When Medius sends emails, we either do so to communicate with the recipient (e.g. to reply to an email from him/her or to ask a question), or to inform the recipient of something.

The content of incoming email is usually unknown when the email is received by Medius. When that is the case, the personal data contained in the email is processed by Medius for the purpose of receiving and reading the email to assess if the email shall be deleted or if Medius shall take action. For emails sent from Medius, similar considerations are made in connection with the dispatch of emails.

If Medius, after receipt of an incoming email, or in connection with sending an outgoing email, considers that the email should not be deleted and that further processing is necessary, Medius will on a case-by-case basis decide the legal basis, means, and period for the processing. The legal basis for the processing of emails depends among other things on the content of the email and whether Medius has any relationship with the recipient/sender.

If an email received by Medius contains personal data about a third-party individual, Medius will inform such individual that Medius processes personal data about him/her, provided (i) the identity of the individual is clear and (ii) the provision of such information proves impossible or would involve a disproportionate effort for Medius.

If Medius upon receipt/dispatch of an email, determines that the email shall be deleted, deletion will be made within a reasonable time after receipt/dispatch. If Medius determines that further actions will be taken, it depends on the content of the email, as well as the continued processing and purpose of the same, how long the email, including the personal data, will be kept by Medius.



# **Security**

Medius takes security seriously. We take various steps to protect information you provide to us from loss, misuse, and unauthorised access or disclosure. These steps take into account the sensitivity of the information we collect, process, and store, and the current state of technology.

## Changes to this privacy policy

We may change this policy from time to time and if we do we will post any changes on this page. If you continue to interact with us after those changes are in effect, you are agreeing to the revised policy. You can see previous versions of our privacy policy here

