

# Privacy Policy

Updated 2020-09-17

## 1 - Introduction

This policy regarding the processing of personal data ("Privacy Policy") describes how Inre styrka Sverige AB, (in this privacy policy also called "Inre styrka", "we" "our", "us") org.nr 556803-6718, Stora Gatan 19 A, 193 35 Sigtuna, Sweden, e-mail: birgitta@inrestyrka.se, collects, uses, discloses and stores your personal data and shows how Inre styrka ensures that your data is processed following current data legislation.

### 1.1 By you, mean as

- participants in and users of the websites inrestyrka.se or birgittasjostrand.se,
- consultant,
- contact person at suppliers, partners, customers, etc. or
- contact us spontaneously as a private person or representative of an organization.

**1.2** Inre styrka is responsible for data for Inre Styrka's handling of your personal data and is responsible for the handling taking place following applicable legislation.

**1.3** If you are in any way not satisfied with how we process your personal data, you have the right to submit any complaints to the Data Inspectorate. If you have a complaint, we would be very grateful if you first contact us so that we can try to resolve it for you.

**1.4** The information we have about you must be correct and up to date. Please let us know if your personal information needs to be updated or changed by sending an e-mail to birgitta@inrestyrka.se

## 2 - What do we do with your personal information?

**2.1** With the support of your consent, we will send you marketing via e-mail about our services and products. It is both free material and premium material (e.g. blogs, videos, workbooks, white papers, etc.) but also information about various events (e.g. webinars, breakfast seminars, etc.).

**2.2** When you purchase something from our website, as part of the buying and selling process, we collect the personal information you provide us to enable you to enter into agreements with Inre styrka and for us to deliver the services and products that you bought. The personal information is also used so that we can offer you support. We also collect information about you while you are a customer with us, such as your purchase history, how you interact with our website and which offers and events you have been interested in by reading an email from us or clicking on a link in email from us. We do this to be able to send you relevant information about our services and offers.,.

**2.3** When you, as another interested party (e.g. consultant, the contact person at customers, suppliers, partners, etc. and persons/organizations who contact us spontaneously), we process your data to maintain and administer the business relationship with you and answer your contact.

## 3 - How do we process your data?

**3.1** Data includes all data that allows us to identify a person. It does not include anonymized data. We may process different types of personal data, such as:

- Identity information that can include your first name, last name, job title.
- Contact information that may include your billing address, shipping address, email address, telephone number
- Payment information that may include bank and credit card information.
- Transaction information that may include information about payments between us and other information about purchases you have made with us.
- Technical information that may include your login information, IP address, browser, a plug-in for your browser, time zone and location information, operating systems and other technology that you use through your devices on our website.

- Profile information that may include username and password, purchases you have made, your interests, preferences and feedback you have given us.
- User information that may include how you use our website and our products and services.
- Marketing and communication information may include how you want to receive marketing from us and our third-party services.

**3.2** We may also use aggregated information from your personal information that does not identify who you are. The collected information does not count as personal data until we can link it with you. For example. We can analyze how many of the visitors to our site use a particular feature by using aggregated data. If we can link this collected data to your data and thereby identify you, the collected data also becomes personal data and is processed accordingly.

**3.3** We do not collect or process any sensitive personal information about you. Sensitive personal data includes, i.e. details of your ethnicity, religion, sexual preferences, political views or biometric data.

## **4 - How do we collect your personal information?**

**4.1** We collect your personal information using various methods such as:

- Direct contact: You can, for example, give us your personal information by filling out forms on our website or communicating with us by letter, telephone, e-mail or when you:
  - buy our products and services
  - start subscribing to any of our services (e.g. e-mails)
  - request that we send information or marketing to you
  - Participate in a survey, campaign or contest
  - give us feedback
- Automated collection: When you visit our website, we can automatically collect technical information about the device you use, your search history on our website and user patterns. We collect this information by using cookies, server logs and similar technology. We may also collect information if you visit other sites that use our cookies. Please read more about how we process cookies under point 12.
- Third-party services or public sources: We may obtain information about you through various third-party services and available sources such as:
  - Technical information from the following services: Infusionsoft, Kajabi
  - Analysis tools such as Google et al. based outside the EU
  - Advertising tools such as Google and Facebook and others. based outside the EU
  - contact, payment and transaction information from technical, payment and delivery service providers such as Stripe, Kajabi, based outside the EU
  - contact and identity information from suppliers such as Hitta.se and Allabolag.se based within the EU
  - public contact and identity information from authorities such as the Swedish Companies Registration Office based within the EU

## **5 - Why do we process your data?**

**5.1** We only process your data when there is a legal basis for the processing. The most common reasons why we process your personal data are:

- to be able to deliver what has been agreed in connection with your purchase.
- to be able to maintain and administer a business relationship with you or the organization you represent
- to be able to answer you when you or the organization you represent or contact us spontaneously.
- to be able to comply with current legislation, e.g. the Accounting Act
- when there is a legitimate interest in Inre styrka (as long as your interest in protecting your data does not outweigh), so-called balancing of interests too, for example, send marketing to you.

**5.2** You will receive marketing from us if you:

- asked for information from us or has purchased any of our services, or
- if you have given us your data for another reason (e.g. if you start subscribing to any of our e-mails and other marketing) and have given your consent for us to send information to you; and

- in no case marked that you do not want to receive marketing from us.

**5.3** When we ask for your personal information, we also ask you for your consent and ask you to confirm by e-mail that we may send marketing to you. We allow you to revoke your consent at any time by changing settings in our preference centre or clicking on the link "unsubscribe" or "unsubscribe" that is in all e-mails that we send in the form of e-mail marketing to you. You can also contact [birgitta@inrestyrka.se](mailto:birgitta@inrestyrka.se) to withdraw your consent.

**5.4** If you revoke your consent to us sending marketing to you, it will not affect the processing of personal data that applies after the purchase of the service has been completed. However, you should be aware that the services may not work as before or that Inre styrka can no longer keep you updated on changes in services you have purchased or ensure that services work as intended.

## 6 - Summary of how we process your data

Below we have summarized how we intend to use your information and for what purpose. We have also stated what legal grounds we have for processing the data, or balancing interests where appropriate.

### **Purpose**

Provide, administer, develop and maintain services

### **Type of personal information**

- Identity information
- Contact information
- Payment details
- Transaction fees
- Technical information
- Profile information
- User information
- Marketing and communication tasks

### **Legal reason**

Fulfilment of agreements

### **Purpose**

Comply with legal requirements, e.g. the Accounting Act

### **Type of personal information**

- Identity information
- Contact information
- Payment details
- Transaction information

### **Legal reason**

Legal obligation

### **Purpose**

Market Inre styrka and our services in a way that is relevant to you

### **Type of personal information**

- Identity information
- Contact information
- Technical information
- Profile information
- User information
- Marketing and communication tasks

### **Balancing of interests**

- Creates the opportunity to develop our services
- Create the opportunity to communicate with our customers in a relevant way

### **Purpose**

Analysis to improve, e.g. our services, website, marketing and customer relationships

### **Type of personal information**

- Identity information

- Contact information
- Technical information
- Profile information
- User information
- Marketing and communication tasks

#### **Balancing of interests**

- Creates the opportunity to define our target group
- Create the opportunity to keep our website and our services up to date

#### **Purpose**

Maintain and administer the business relationship with customers, suppliers, partners and to be able to answer inquiries from private individuals or organizations that come to us spontaneously.

#### **Type of personal information**

- Identity information
- Contact information

#### **Balancing of interests**

To enable us to administer and maintain business relationships with customers, suppliers, partners, etc. and to be able to answer requests that come to us spontaneously.

## **7 - To whom do we provide your personal information?**

**7.1** We do not sell or rent your personal information to any third party.

**7.2** In general, the third-party services we use are only to collect and process information needed to enable them to deliver the services for which we have hired them. These suppliers are:

- Service providers that provide IT, system and administration services
- Professional advisers in the form of a lawyer, bank, accountant and insurance company
- Authorities where there are applicable legal requirements

**7.3** Many of our third-party suppliers are based outside the EU / EEA. To use their services, we require that you transfer your data outside the EU / EEA. Countries outside the EU / EEA do not always have the corresponding security and current processing of personal data. As a registered person, you are also not insured for the same rights as European data protection legislation stipulates. Therefore, European law has prohibited the transfer of personal data unless the transfer meets certain criteria, see section 7.4.

**7.4** When we transfer your data outside the EU / EEA, we do our best to ensure the same high level of security requirements by ensuring that at least one of the following points is met:

- In some cases, we transfer your data to countries that have the same requirements to provide a high level of security regarding personal data established by the European Commission; or
- In cases where we use specific suppliers, we use particular contracts, ethical standards or certifications approved by the European Commission, which thus provide data with the same protection as within the EU / EEA; or
- When we use suppliers in the USA, we transfer data to the USA, which means that your data is not protected in the same way as it would have been within the EU / EEA. As a registered person, you are also not assured of the rights that follow from European data protection legislation. However, we always strive to take appropriate protection measures in the event of such a transfer, following applicable data protection requirements.

**7.5** If our business and / or website is acquired or merges with another company, your information may be transferred to the new owners so that they can continue to sell and provide support for our products and services.

## **8 - Your safety is important to us**

**8.1** We have taken appropriate precautions to ensure that we do not lose, misuse, access, disclose, alter or destroy your personal information. Besides, your data is only handled by employees, suppliers and third-party services where there is a necessary need. They are bound by a confidentiality agreement and will only hold your personal information following instructions from us.

**8.2** Should, despite our precautions, any form of intrusion occurs that affects your data, we will notify you and the relevant authority when we have a legal obligation to do so.

**8.3** Our website may contain links to third party sites, plug-ins and applications. When you click on links or approve extensions, it may cause you to agree that third-party services collect and share your personal information. We do not control these third-party services and are not responsible for the privacy policies that apply to other sites. Therefore, we encourage you to read privacy policies on other sites that you visit.

## **9 - How long do we store your information?**

**9.1** We only store your data for as long as it is necessary for the purpose for which the personal data was first collected, including what is required by applicable laws and regulations (e.g. the Accounting Act).

**9.2** To determine how long we must save your data, we look at the amount, purpose and risk of unauthorized access and whether we can achieve the intended purpose in other ways as well as for the legal obligations that exist. Thinning of customer data and other stakeholders' data generally takes place when our relationship with you as a customer / other stakeholder has been inactive for one year. According to current accounting laws, we must retain necessary information about our customers (including contact information, identity, financial information and transaction information) for at least seven years after the accounting date.

**9.3** In certain circumstances, you may ask us to delete your personal data. Regarding the deletion of your information, please contact us at [birgitta@inrestyrka.se](mailto:birgitta@inrestyrka.se). In certain circumstances, we may choose to anonymize your personal information (so that it can no longer be linked to you) for statistics and analysis, in which case we have the opportunity to use this information indefinitely without notifying you.

## **10 - Your rights**

**10.1** Following applicable law, you have rights linked to your data. These rights are to:

- request access to and information about your information
- request changes and corrections of your data if they are incorrect
- request deletion of your data
- object to the handling of your data
- request a restriction on how your data is processed
- request an extract from your data
- withdraw consent on how your data is handled
- the right to submit complaints to the Data Inspectorate

You can read more about these rights at

<https://www.datainspektionen.se/dataskyddsreformen/dataskyddsforordningen/de-registrerades-rattigheter/> If you wish to exercise any of these rights, you are welcome to contact us at [birgitta@inrestyrka.se](mailto:birgitta@inrestyrka.se).

**10.2** You will not have to pay a fee to access your personal information (or exercise any of your other rights), but we may charge a fee if your request is unfounded, recurring or excessive. Alternatively, we may deny your request in these circumstances.

**10.3** We may request specific information from you to help us verify your identity and secure your rights to access your personal information (or exercise any of your other rights). It is a security measure to ensure that personal data is not disclosed to anyone who does not have the right to access it. We may also contact you to get more information about your request to speed up the process.

**10.4** We will try to return to all eligible requests within one month. Sometimes it can take us longer than a month if your request is complicated or if you have several requests. In such a case, we will notify you and keep you updated.

## **11 - Changes to this Privacy Policy**

We will regularly update this Privacy Policy to reflect any changes in how we process personal information. Changes take place as soon as we have published the changes on our website.

## **12 - Cookies**

Inre styrka uses cookies to provide a more personalized user experience for our users and customers. You can make settings in your browser that block or notify you when these cookies are used. Blocking these cookies may result in parts of our website not working as intended. You can read about how we process cookies here. This website uses cookies for:

Google Analytics, a web analytics service provided by Google, Inc. Google Analytics, uses cookies (text files placed on your computer/device) to analyze how you use the website. The information generated through your use of the website (including the IP address of your device) may be passed on to and stored by Google on servers in the U.S.A. Google uses this information to evaluate your use of the website, compiling reports on activities on the website of Inre styrka and providing other services related to activities on the website. Google may also transfer this information to third parties if required by law, or in cases where a third party processes the information on Google's behalf.

<https://policies.google.com/privacy?hl=en>

## **13 - Questions and contact information**

If you want access to, change something, submit a complaint, adjust or delete any personal information we have about you or want more information, you can contact us at [birgitta@inrestyrka.se](mailto:birgitta@inrestyrka.se) or send a letter to Inre styrka Sverige AB, Stora Gatan 19 A, 193 35 Sigtuna, Sweden, telephone +4670-4911906.