PRIVACY POLICY

Effective from 2026-10-01

1. About this Privacy Policy

1.1 Data controller

Hartic AB, company registration no. 559480-6217, Teknikvägen 3, 961 50 Boden, Sweden ("Hartic", "we" or "us"), is committed to protecting your privacy. This Privacy Policy describes how Hartic processes personal data when Hartic itself determines the purposes and means of the processing and is therefore the data controller.

You can contact us regarding personal data matters at info@hartic.se.

1.2 When this policy applies

This policy applies, for example, when you visit www.hartic.se, communicate with Hartic, are a contact person at a customer, supplier or partner, participate in a meeting or event, receive marketing from us, or otherwise have a business relationship with Hartic.

This policy also covers processing of account, support, security and administration data where Hartic itself determines the purpose of the processing.

1.3 When Hartic is a data processor

When a customer uses Hartic's platform to process personal data relating to its employees, participants or other individuals, it is normally the customer that determines why and how the data is to be processed. The customer is then the data controller and Hartic processes the data as a data processor on the customer's behalf.

Such processing is governed by the Data Processing Agreement (DPA) in force between Hartic and the customer. The data subject should primarily contact the relevant customer, for example their employer, for information about the processing for which the customer is responsible and to exercise their rights. Hartic assists the customer in accordance with the DPA and applicable data protection legislation.

This Privacy Policy does not replace the information that the customer itself is required to provide to data subjects.

2. Personal data processed by Hartic

The data we process depends on how you come into contact with Hartic and the relationship you have with us. Hartic only processes personal data that is relevant to the purpose in question.

2.1 Contact and identification data

Examples include name, work-related email address, telephone number, job title, employer or organisation, and other information needed to identify and communicate with you in a business relationship.

2.2 Customer, contract and administration data

Examples include information about the organisation you represent, contact persons, contract and order history, subscription and invoicing information, and information needed to administer the customer relationship. Hartic does not normally process payment card details as part of its ordinary B2B invoicing.

2.3 Account and security data

Where necessary for administration and security, Hartic may process, for example, user identity, access and authorisation data, login events, IP address, technical logs, device and browser information, and information about suspected security incidents. Data processed solely on the customer's behalf is instead covered by the DPA.

2.4 Communications and support

When you contact us, we may process the content of emails, support cases, meeting notes, forms, feedback and other communications needed to handle your request or our relationship with you.

2.5 Website, marketing and business development

We may process contact details, subscription information and marketing preferences, information about interactions with our communications, and technical information about use of our website. The use of cookies and

similar technologies is governed in more detail by Hartic's Cookie Policy and by the choices made through our cookie management solution.

2.6 Information you provide yourself

We may also process other personal data that you voluntarily provide to us, for example in a message, form or meeting. We ask that you do not provide more personal data than is necessary for the matter in question.

3. Sources of personal data

Hartic obtains personal data primarily directly from you or from the organisation you represent. Data may also be obtained from Hartic's own systems and logs, from publicly available business and contact sources, from partners where there is a lawful basis for doing so, and from our website and digital communications in accordance with applicable rules and your choices.

When personal data is processed on behalf of a customer, Hartic receives the data from the customer, users or through use of the Service in accordance with the customer's instructions and the DPA.

4. Purposes and legal bases

Hartic processes personal data only where there is a clear purpose and a legal basis. The legal basis used depends on the processing in question.

4.1 Customer, partner and supplier relationships

We process contact and administration data to establish, administer and follow up business relationships, communicate with contact persons, manage orders and provide relevant information about our services. The processing is normally based on Hartic's legitimate interest in conducting and administering its business and contractual relationships. If you are personally a party to a contract, processing may also be necessary for the performance of a contract with you.

4.2 Invoicing, accounting and other legal obligations

We process the information required for invoicing, bookkeeping, accounting and other obligations arising from law or decisions by public authorities. The processing is based on compliance with a legal obligation and, where relevant, on our legitimate interest in establishing, exercising or defending legal claims.

4.3 Support, operations and security

We process personal data to answer questions, provide support, administer our relationship, prevent misuse, protect our systems and users, troubleshoot, and maintain a secure and stable technical environment. The processing is normally based on our legitimate interest in providing a secure and functioning service and business operation.

4.4 Development and improvement

We may process feedback, statistics and technical usage information to understand how our own services and channels function and to develop and improve them. The processing is normally based on our legitimate interest in product and business development. Customer Data that Hartic processes as a data processor is not used for Hartic's own purposes except to the extent permitted by the DPA, the customer's instructions, or after the information has been anonymised so that it no longer constitutes personal data or can be attributed to the customer.

4.5 Marketing and newsletters

We may use contact details to provide information about Hartic, our services, events and relevant content. The processing is based on legitimate interest or consent, depending on the circumstances and what is required under applicable law. You may object to direct marketing at any time or use the unsubscribe link in a communication.

4.6 Consent

Where processing is based on your consent, providing consent is voluntary and you may withdraw it at any time. Withdrawal of consent does not affect the lawfulness of processing carried out before the consent was withdrawn.

5. Personal data in Hartic's platform

Hartic's platform is used by customers for, among other things, work environment management, surveys, pulse surveys, analyses and other functions. As part of a customer's use, Hartic may, as a data processor, process, for example, user data, organisational affiliation, roles, responses, free-text responses, results and other information that the customer chooses to process in the Service.

Depending on how the customer uses the Service, the data may also include special categories of personal data, for example health data. As data controller, the customer is responsible for ensuring that there is a legal basis and, where required, an applicable exception for processing special categories of personal data. Hartic processes the data in accordance with the customer's documented instructions and the DPA.

Hartic seeks to apply data minimisation and provide functions that support a privacy-protective way of working. Anonymised information that can no longer be linked to an identified or identifiable natural person is not subject to the GDPR.

6. Special categories of personal data

When Hartic itself is the data controller, we do not normally request special categories of personal data. If such data is nevertheless provided to us, for example in a support case or other communication, we process it only where there is a lawful basis and where the processing is necessary for the purpose in question.

Special categories of personal data that Hartic processes on behalf of a customer are handled in accordance with the DPA, the customer's instructions and applicable data protection legislation.

7. Recipients and service providers

Hartic only discloses personal data where this is necessary for a legitimate and lawful purpose. Hartic uses external service providers for certain parts of its business and technical infrastructure. This may include, for example, operations, hosting, security, communications, email delivery, support, finance and other support services. Personal data may therefore be shared with:

- providers of IT, hosting, security, communications, email and support services;
- providers of finance, invoicing and administration services;
- providers of analytics and marketing services where such processing is permitted and, where required, subject to consent;
- professional advisers, auditors and insurers where necessary; and
- public authorities, courts or other recipients where Hartic is required to disclose data by law or a binding decision.

Service providers that process personal data on Hartic's behalf may only process the data in accordance with agreements, documented instructions and applicable data protection legislation. They may not use the personal data for their own purposes unless they themselves have an independent legal basis and responsibility for such processing.

Hartic's principal platform and customer data, including data stored in Hartic's Service, is stored on servers in Sweden. Certain external support services may, however, involve limited personal data, such as contact details, email addresses, communication data or technical logs, being processed by a service provider within or outside the EU/EEA. Sub-processors that process personal data on behalf of a customer are specifically governed by the DPA, and information about current sub-processors is provided in accordance with that agreement.

Hartic does not sell personal data.

8. Transfers outside the EU/EEA

Hartic's starting point is to store the principal platform and customer data in Sweden and otherwise to process personal data within Sweden or the EU/EEA where possible. The use of certain global service providers or their sub-processors may, however, result in limited personal data being transferred to, processed in, or made accessible from a country outside the EU/EEA.

Where such a transfer to a third country takes place, Hartic ensures that there is a valid legal transfer mechanism and that applicable GDPR requirements are met. The transfer may, for example, be based on an adequacy decision by the European Commission, the EU-U.S. Data Privacy Framework for recipients in the United States covered by the framework, or the European Commission's Standard Contractual Clauses together with any additional safeguards that may be required.

For personal data that Hartic processes as a data processor, transfers to third countries, the use of sub-processors and applicable safeguards are also governed by the DPA. Information about the applicable transfer mechanism is provided upon request to the extent required by law.

9. How long personal data is retained

As a general rule, the following criteria apply:

- contact and business relationship data is retained for as long as the relationship is active and thereafter for as long as the data remains relevant for follow-up, legal claims or other legitimate needs;
- invoice and accounting records are retained for the period required by applicable law;
- data used for direct marketing is retained for as long as it is relevant for the purpose or until you object or withdraw consent, unless limited information needs to be retained in order to respect your choice;
- support and communication data is retained for as long as needed to handle the matter, document the relationship, or establish, exercise or defend legal claims; and
- technical and security-related logs are retained in accordance with documented retention periods adapted to security, troubleshooting and audit needs.

Personal data that Hartic processes on behalf of a customer is retained and deleted in accordance with the customer's instructions, the agreement and the DPA.

10. Security

Hartic implements appropriate technical and organisational measures to protect personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage. The measures are adapted to the nature, scope and risks of the processing and are reviewed as necessary. Hartic's architecture and choice of service providers are designed with the aim of limiting access to personal data and ensuring that the principal storage of platform and customer data takes place in Sweden.

Access to personal data is limited to persons and service providers who need the data for their duties and who are subject to appropriate confidentiality and security requirements.

11. Automated decision-making and profiling

When Hartic is the data controller, Hartic does not use automated decision-making based solely on automated processing that produces legal effects concerning you or similarly significantly affects you, unless we expressly inform you otherwise and have a lawful basis for the processing.

Certain analysis or segmentation may occur, for example for statistics or relevant marketing, but such processing does not in itself constitute automated decision-making of the kind described above.

12. Your rights

When Hartic is the data controller, you have, depending on the circumstances and the legal basis, the following rights under the GDPR:

- the right to receive information about how your personal data is processed;
- the right to access the personal data that Hartic processes about you;
- the right to request rectification of inaccurate or incomplete data;
- the right, in certain cases, to request erasure of personal data;
- the right, in certain cases, to request restriction of processing;
- the right to object to processing based on legitimate interest and the right at all times to object to direct marketing;
- the right to data portability where the conditions under the GDPR are met; and

- the right to withdraw consent where the processing is based on consent.

These rights are not absolute and may in certain cases be restricted by law or other legitimate grounds. We may need to verify your identity before handling a request.

To exercise your rights when Hartic is the data controller, contact info@hartic.se. Where Hartic processes personal data as a processor for a customer, you should normally contact that customer. Hartic assists the customer in handling data subjects' rights in accordance with the DPA.

You also have the right to lodge a complaint with the Swedish Authority for Privacy Protection (Integritetsskyddsmyndigheten, IMY) if you believe that the processing of your personal data infringes applicable data protection rules.

13. Cookies and similar technologies

Information about the cookies and similar technologies Hartic uses on its websites, their purposes, retention periods, providers, and how you can give or withdraw consent is available in Hartic's separate Cookie Policy and in the cookie management solution displayed on the website.

14. Links and external services

Hartic's websites and communications may contain links to external websites and services. When you leave Hartic's environment, the external party is responsible for its own processing of personal data in accordance with its terms and privacy policies.

15. Changes to this Privacy Policy

Hartic may update this Privacy Policy when our processing, our services or applicable rules change. The version in force from time to time is published at www.hartic.se. In the event of material changes that significantly affect data subjects, we will provide information in an appropriate manner before the change takes effect where required by law.

16. Contact

If you have questions about this Privacy Policy, Hartic's processing of personal data, or wish to exercise a right, you can contact us:

Hartic AB | Company registration no. 559480-6217 | Teknikvägen 3, 961 50 Boden, Sweden | info@hartic.se | www.hartic.se