Privacy policy

Adopted by the Board of Directors on 2.12.2024.

Content

1.Background and purpose

The purpose of this policy is to establish adequate standards for the protection of personal data in Inission (556747– 1890) that will meet the requirements set by the General Data Protection Regulation EU 2016:679 (GDPR) and other national laws that require adequate data protection standards.

This policy is in addition to the provisions of applicable law and any regulatory requirements.
This policy shall be made available to third parties such as customers, suppliers and stakeholders upon request.

2. Policy

1) Processing: Any operation or set of operations performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
2) Personal data: any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
3) "Controller" means a natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of

personal data.

4) "Data processor" means a natural or legal person, public authority, agency or other body that processes personal data on behalf of the controller.

5) Cross-border transfers: Personal data processed in an EU or EEA country is made available in a country outside the EU. EU/EEA.

2.1 Processing of personal data

1) Personal data (as defined in 2.2) may only be collected and processed for specified, explicit and legitimate purposes to the extent permitted by applicable law. Personal data may only be processed for the purposes for which it was originally collected or for business purposes that are compatible with the original business purposes.

2) When processing personal data, the data shall be processed in a lawful, correct and transparent manner. In other words, the data must not be processed in a way that is contrary to the Regulation. The information must be accurate and up-to-date. Furthermore, the processing should be open and transparent, it should be clear what data is processed, how it is processed and why it is processed. Information about the processing must be provided to the data subject in a clear and transparent manner.

3) The processing of personal data requires a legal basis for the processing. This is regulated by Article 6 of the GDPR and stipulates that one or more of the legitimate conditions must be met for personal data to be processed:

   a) Agreements
   b) Legitima intressen
   c) Legal obligation
   d) Consent
   e) Fundamental interest
   f) Exercise of public authority and public interest

4) Inission mainly bases its processing of personal data on agreements with data subjects, legal obligations and, in some cases, through the data subject's consent to processing. Furthermore, personal data may be processed on the basis of legitimate interest for internal customer analyses, business development and marketing.

5) If the processing is based on the data subject's consent, the controller must be able to demonstrate that the data subject has consented to the processing of personal data. Before consent is given, the data subject must be informed of the right to withdraw consent at any time.

6) Inission processes personal data provided to the company in connection with the data subject's use of the company's services. In general, the information stored and processed by the company comes from agreements or expressions of interest. Such information may include name, telephone number, e-mail address and customer number. Communication via e-mail, via the company's website or received phone calls may also be saved or recorded. The purpose of the process is to maintain a high standard of the company's services and meet obligations regulated by laws or regulations.

7) Inission is the data controller for the personal data provided by the data subject.

8) Personal data is not stored for longer than is necessary in relation to the purpose of the processing. The data is stored for as long as the contractual relationship persists, and after the relationship has been dissolved, the data is deleted when it is no longer necessary to fulfil the purpose of the processing. In some cases, the data may be stored for longer or shorter periods of time according to superior laws (e.g. limitation period of ten years, accounting seven years or money laundering five years).

3. Target audience

The privacy policy applies to all companies within Inission, including third parties such as consultants and suppliers.

4. Roles and responsibilities

- The CDO is responsible, the CEO is ultimately responsible, for compliance with this policy.
- The CDO is responsible for the company's IT environment and must create the conditions necessary for the content of this policy to be complied with. Sales managers act as a point of contact between the business and third parties.
- Process/system/information owners must be present for all business-critical systems and are responsible for ensuring regulatory compliance for personal data processing and settings in the systems and processes.
- All employees are responsible for complying with Inission's adopted privacy policy.

5. Exclusions

Exceptions to the Privacy Policy must be approved by the Board of Directors.

6. Proof of compliance

- In order for the principle to be considered compatible, the following criteria must be met:
- Privacy policies and user consent mechanisms.
- Proof of consent in CRM systems
- Data storage and deletion protocols.

7. Associated documents

- Guidelines for handling personal data