

# PRIVACY POLICY

## 1. Introduction

VASS PRODUCTIONS AB, org.nr 556857-9766, and VASS PR AS org.nr 917 554 609 (jointly referred to as "VASS" or "We") protect your personal integrity and want to ensure you that we process your personal data in accordance with the GDPR (the EU General Data Protection Regulation nr. 2016/679).

This Privacy Policy sets out how we may collect, process and store your personal data. This policy applies where we are acting as a data controller with respect to your personal data; in other words, where we determine the purposes and means of the processing of that personal data.

## 2. What is personal data?

Personal data means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier such as IP-address, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

## 3. What personal data does VASS collect?

Vass collects personal data that you have provided, such as:

- Name
- E-mail
- Phone number
- Address
- Identification number (sv. Personnummer)
- Bank account number
- CV
- Photos/Film
- Social Channel Statistics
- Geographic statistics

## 4. How does VASS collect personal data?

We may collect personal data that you give us, for example:

- By filling in a form on our website or sending us an e-mail
- If you apply for a job at VASS
- If you participate in competitions and other promotional activities that we organize
- If you visit or communicate with us through our social media accounts (ie third party platforms such as Facebook and Instagram), VASS may receive information about your profile and your third party platform interactions from its provider.

This information may be personal, financial, educational or related to your employment history. Information we may collect from you

## 5. Why does VASS collect personal data?

The personal data collected about you will be processed by VASS, or its subcontractors, for the following purposes:

- a. To fulfill our agreement with you;
- b. To provide our services and to process your payment;
- c. To place orders and make payments;
- d. To communicate with you by email, website forms and in our social media accounts;
- e. For recruitment purposes;



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- f. To administer marketing activities like competitions and to announce winners etc.
- g. For marketing purposes, including mail, email and sms / mms marketing (which you can choose to unsubscribe from via a link in each mail or email / text message);
- h. To get statistics about the use of our website and other Social Media;
- i. To maintain, develop, test and improve our website and the technology platforms on which they are provided; and
- j. To comply with applicable laws, for example accounting laws.
- k. Digital Marketing profiles

#### 6. Legal ground for processing of personal data

Vass always processes your personal data in accordance with applicable law. We process your personal data when it is necessary to fulfill an agreement with you and when we have another legal and legitimate interest in processing your personal data. If VASS were to process your personal data for any purpose that, according to applicable law, requires your consent, we will obtain your prior consent.

#### 7. Protection of personal data

VASS protects your personal data with high security and takes appropriate technical and organizational security measures to protect your personal data from unauthorized access, modification, dissemination or destruction.

#### 8. Restriction on disclosure of personal data

VASS may collaborate with external partners (subcontractors) to perform tasks for VASS' account, for example, to provide IT services, delivery, accounting, payment solutions or help with marketing, analysis or statistics. The execution of these services may mean that VASS partners, both within the EU / EEA and outside the EU / EEA, will have access to your personal data. Companies that handle personal data on Vass behalf always sign a data processor agreement with Vass to ensure a high level of protection for your personal data.

If your personal data is transferred to any country outside the EU / EEA, Vass will take steps to ensure that your personal data remains protected and also take the necessary steps to legally transfer personal data to non-EU / EEA countries.

#### 9. How long will we store your personal data?

VASS will not retain your personal data for longer than what is necessary.

We will keep your personal information:

- For as long as required by law
- Until we no longer have a valid reason for keeping it
- Until you request us to stop using it.

We may keep just enough of your personal data to ensure that we comply with your requests not to use your personal information or comply with your right to erasure. For example, we must keep your request to be erased even if it includes your personal data until such time as you are no longer our customer.

#### 10. Your rights

VASS will, at your request or on its own initiative, rectify, disassociate, delete or supplement information that is found to be incorrect, incomplete or misleading.

You are entitled to object to personal data processing performed on the legal basis of a balance of interest. If you object to such processing, we will only continue to process your personal data if there are legitimate reasons for treatment that weigh heavier than your interests.

If you do not want us to process your personal data for direct marketing, you are always entitled to object to such processing by contacting us, see contact information below. Once we have received your objection, we will cease processing your personal data for such marketing purposes.



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You are also entitled to request:

- a. Access to your personal data: This means that you are entitled to request a registry outline of the personal data being processed about you. You are also entitled to receive a copy of the personal data being processed. You are entitled to once a calendar year, by written application, receive a transcript of what personal data is registered about you, the purpose of the processing and information about who we have disclosed your information to.
- b. Correction of your personal data: We will correct any incorrect or incomplete information we have stored about you as soon as possible upon your request.
- c. Deletion of your personal data: This means that you are entitled to request that your personal data be removed if it is no longer necessary for the purpose for which it was collected. However, this right is limited by the fact that there may be legal requirements preventing us from immediately deleting your personal data, for example, accounting and tax laws. In that case, we will stop processing your personal data for any purposes other than complying with applicable legislation.
- d. Limitation of data processing: This means that your personal data may only be used for specific purposes that you have agreed to. For example, you may request a limitation when you consider your information to be incorrect and you have requested a correction according to section 11.b of this Privacy Policy. Meanwhile, the accuracy of the data is investigated, the processing will be limited.
- e. Data portability: This means that you have the the right to, under certain conditions, extract and transfer your personal data in a structured, widely used, and machine-readable format to another data controller.

## 11. Contact information

VASS PRODUCTIONS AB, org.nr 556857-9766 and VASS PR AS org.nr 917 554 609, is the responsible data controller for the processing of your personal data. If you have any questions about our processing of your personal data, what information we have stored or if you would like to exercise any of your rights as stated above please contact:

Kristin Bohman, [Kristin@vasspr.com](mailto:Kristin@vasspr.com)

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## 12. Changes to this Privacy Policy

Vass may, from time to time, make changes to this Privacy Policy. The latest version of the Privacy Policy is always available on VASS website.



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