

## Privacy Policy

Effective as of 10 September 2019, last updated November 2020.

This “Privacy Policy” describes the privacy practices of Quinyx AB and our subsidiaries and affiliates (collectively, “Quinyx”, “we”, “us”, or “our”) in connection with the [www.quinyx.com](http://www.quinyx.com) website or any other website that we own or control and which posts or links to this Privacy Policy. This Privacy Policy also applies to contact persons at companies who are our customers or potential customers and individuals participating in our events, (collectively, the “Service”), and the rights and choices available to individuals with respect to their information.

Quinyx may provide additional or supplemental privacy policies to individuals for specific products or services that we offer at the time we collect personal data. These supplemental privacy policies will govern how we may process the information in the context of the specific product or service.

### Table of Contents

- [Controller and Data Protection Officer](#)
- [Personal data We Collect](#)
- [How We Use Your Personal data](#)
- [Legal Bases for Processing](#)
- [How We Share your Personal Data](#)
- [Retention](#)
- [Your Rights and Choices](#)
- [Other sites, mobile applications and services](#)
- [Security practices](#)
- [International data transfers](#)
- [Children](#)
- [Your California Privacy Rights](#)
- [Changes to this Privacy Policy](#)
- [How to Contact Us](#)

### Controller and Data Protection Officer

Quinyx AB is the controller of your personal data covered by this Privacy Policy for the purposes of European data protection legislation. This Privacy Statement describes Quinyx in its role as a controller of personal data. Quinyx’s role as a data processor is regulated by applicable data processing agreements with the respective data controller.

Quinyx has appointed a Data Protection Officer, who can be contacted at [dpo@quinyx.com](mailto:dpo@quinyx.com).

### Personal Data We Collect

**Information you provide to us.** Personal data about you that you provide to us through the Service or otherwise includes:

- **Business and personal contact information**, such as your first and last name, email and mailing addresses, phone number, professional title and company name.
- **Profile information**, such as your username and password that you may set to establish an online account with us, your photograph, interests, and preferences.
- **Registration information**, such as information that may be related to a service, an account or an event you register for.
- **Feedback or correspondence**, such as the information you provide when you contact us with questions, feedback, or otherwise correspond with us online.
- **Demographic Information**, such as your city, state, country of residence, postal code, and age.
- **Financial information**, such as your financial account numbers or payment card information.
- **Transaction information**, such as information about payments to and from you and other details of products or services you have purchased from us
- **Usage information**, such as information about how you use the Service and interact with us, including information associated with any content you upload to the websites or otherwise submit to us, and the information you provide when you use any interactive features of the Service
- **Other information** that we may collect which is not specifically listed here, but which we will use in accordance with this Privacy Policy or as otherwise disclosed at the time of collection.

**Information we obtain from social media platforms.** We may maintain pages for our Company on social media platforms, such as Facebook, LinkedIn, Twitter, Google, YouTube, Instagram, and other third party platforms. When you visit or interact with our pages on those platforms, the platform provider's privacy policy will apply to your interactions and their collection, use and processing of your personal data. You or the platforms may provide us with information through the platform, and we will treat such information in accordance with this Privacy Policy.

**Information we obtain from other third parties.** We may receive personal data about you from third-party sources. For example, a business partner may share your contact information with us if you have expressed interest in learning specifically about our products or services, or the types of products or services we offer. We may obtain your personal data from other third parties, such as marketing partners, publicly-available sources and data providers.

#### **Cookies and Other Information Collected by Automated Means**

We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and activity occurring on or through the Service. The information that may be collected automatically includes your computer or mobile device operating system type and version number, manufacturer and model, device identifier (such as the Google Advertising ID or Apple ID for Advertising), browser type, screen resolution, IP address, the website you visited before browsing to our website, general location information such as city, state or geographic area; and information about your use of and actions on the Service, such as pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and length of access. Our service providers and business partners may collect this type of information over time and across third-party websites and mobile applications.

On our webpages, this information is collected using cookies, browser web storage (also known as locally stored objects, or "LSOs"), web beacons, and similar technologies, and our emails may also contain web beacons. See our [Cookies and other technologies Policy](#) for more information.

## How We Use Your Personal Data

We use your personal data for the following purposes and as otherwise described in this Privacy Policy or at the time of collection:

**To operate the Service.** We use your personal data to:

- provide, operate and improve the Service
- provide information about our products and services
- establish and maintain your user profile on the Service
- enable security features of the Service, such as sending you security codes via email or SMS, and remembering devices from which you have previously logged in
- communicate with you about the Service, including by sending you announcements, updates, security alerts, and support and administrative messages
- communicate with you about events or contests in which you participate
- understand your needs and interests, and personalize your experience with the Service and our communications
- provide support and maintenance for the Service
- to respond to your requests, questions and feedback

**For research and development.** We analyze the use of the Service to analyze and improve the Service and to develop new products and services, including by studying user demographics and use of the Service.

**To send you marketing and promotional communications.** We may send you Quinyx-related marketing communications as permitted by law. You will have the ability to opt-out of our marketing and promotional communications as described in the [Opt out of marketing](#) section below.

**To display advertisements.** We work with advertising partners to display advertisements on the Service. These advertisements are delivered by our advertising partners and may be targeted based on your use of the Service or your activity elsewhere online. To learn more about your choices in connection with advertisements, please see the section below titled "Targeted online advertising."

**To comply with law.** We use your personal data as we believe necessary or appropriate to comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities.

**For compliance, fraud prevention, and safety.** We may use your personal data and disclose it to law enforcement, government authorities, and private parties as we believe necessary or appropriate to: (a) protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims); (b) enforce the terms and conditions that govern the Service; and (c) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

**With your consent.** In some cases we may specifically ask for your consent to collect, use or share your personal data, such as when required by law.

**To create anonymous data.** We may create anonymous data from your personal data and other individuals whose personal data we collect. We make personal data into anonymous data by removing information that makes the data personally identifiable to you. We may use this anonymous data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

We use Hotjar in order to better understand our users' needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users' experience (eg

how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behavior and their devices. This includes a device's IP address (processed during your session and stored in a de-identified form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), and the preferred language used to display our website. Hotjar stores this information on our behalf in a pseudonymized user profile. Hotjar is contractually forbidden to sell any of the data collected on our behalf.

For further details, please see the 'about Hotjar' section of Hotjar's [support site](#).

**Automated Decision-Making and Profiling.** We may use automated decision-making in regard to your personal data for some services and products, for example, the Service might make recommendations about scheduling preferences based on your previous selections. You can request a manual review of the accuracy of an automated decision that you are unhappy with or limit or object to such automated decision-making and/or profiling by contacting us at [dpo@quinyx.com](mailto:dpo@quinyx.com).

### Legal Bases for Processing

We use your personal data only as permitted by law. Our legal bases for processing the personal data described in this Privacy Policy are described in the table below.

<a href="#">Processing purpose</a> (click link for details) <i>Details regarding each processing purpose listed below are provided in the section above titled "How we use your personal data".</i>	<b>Legal basis</b>
<b>To operate the Service</b>	Processing is necessary to perform the contract governing our provision of the Service or to take steps that you request prior to signing up for the Service. If we have not entered into a contract with you, we process your personal data based on our legitimate interest in providing the Service you access and request.
<ul style="list-style-type: none"> <li>● To administer events and contests</li> <li>● For research and development</li> <li>● To send you marketing communications</li> <li>● To display advertisements</li> <li>● To manage our recruiting and process employment applications</li> <li>● For compliance, fraud prevention and safety</li> <li>● To create anonymous data</li> </ul>	These activities constitute our legitimate interests. We do not use your personal data for these activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
<b>To comply with law</b>	Processing is necessary to comply with our legal obligations.
<b>With your consent</b>	Processing is based on your consent. Where we rely on your consent, you have the right to withdraw it any time in the manner indicated when you consent or in the Service.

**Use for new purposes.** We may use your personal data for reasons not described in this Privacy Policy where permitted by law and the reason is compatible with the purpose for which we collected it. If we need to use your personal data for an unrelated purpose, we will notify you and explain the applicable legal basis.

**Sensitive personal data.** We ask that you not provide us with any sensitive or special categories of personal data (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Service, or otherwise to us.

If you provide us with any sensitive personal data to us when you use the Service, you must consent to our processing and use of such sensitive personal data in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal data, you must not submit such sensitive personal data through our Service.

## How We Share your Personal data

We do not share your personal data with third parties without your consent, except in the following circumstances or as described in this Privacy Policy:

**Affiliates.** We may share your personal data with our corporate parent, subsidiaries, and affiliates, for purposes consistent with this Privacy Policy.

**Service providers.** We may share your personal data with third party companies and individuals that provide services on our behalf or help us operate the Service (such as customer support, hosting, analytics, email delivery, marketing, and database management services). These third parties may use your personal data only as directed or authorized by us and in a manner consistent with this Privacy Policy, and are prohibited from using or disclosing your information for any other purpose.

**Third-party platforms and social media networks.** If you have enabled features or functionality that connect the Service to a third-party platform or social media network (such as by logging in to the Service using your account with the third-party, providing your API key or similar access token for the Service to a third-party, or otherwise linking your account with the Service to a third-party's services), we may disclose the personal data that you authorized us to share. We do not control the third party's use of your personal data.

**Professional advisors.** We may disclose your personal data to professional advisors, such as lawyers, bankers, auditors and insurers, where necessary in the course of the professional services that they render to us.

**For compliance, fraud prevention and safety.** We may share your personal data for the compliance, fraud prevention and safety purposes [described above](#).

**Business transfers.** We may sell, transfer or otherwise share some or all of our business or assets, including your personal data, in connection with a business transaction (or potential business transaction) such as a corporate divestiture, merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy or dissolution. In such a case, we will make reasonable efforts to require the recipient to honor this Privacy Policy.

## Retention

We retain personal data for as long as necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for fraud prevention purposes.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. Subject to applicable law, we abide by the specific retention periods outlined below for the following categories

- **To operate the Service** - If you are a contact person for one of our customers, we will retain your personal data during the time you are the contact person or for the entire contract period between us and your employer. We only use anonymized and aggregated data for service development.
- **To send you marketing and promotional communications** - If you are a contact person for one of our customers, we will retain your personal data during the time you are the contact person or for the entire contract period between us and your employer. This is on the condition that you have not previously objected to direct marketing. If you are a contact person for a company that has been flagged as a prospective customer and you have not given consent, we will retain your personal data for no longer than 24 months. This is on the condition that you have not previously objected to direct marketing. If you have consented to us processing your personal data for marketing purposes

(e.g., when attending one of our events) we will retain your personal data for as long as you have not withdrawn your consent or objected to direct marketing.

- **For compliance, fraud prevention, and safety** - In case of a dispute regarding for example payment, we retain your personal data as long as necessary for us to defend, establish or exercise any claims.

Some data will be anonymized and used for service development. When you choose to opt out from any type of communication from us, your personal data will no longer be used for that purpose.

## Your Rights and Choices

### Your Rights

You may ask us to take the following actions in relation to your personal data that we hold:

- **Access.** Provide you with information about our processing of your personal data and give you access to your personal data.
- **Correct.** Update or correct inaccuracies in your personal data.
- **Delete.** Delete your personal data.
- **Transfer.** Transfer a machine-readable copy of your personal data to you or a third party of your choice.
- **Restrict.** Restrict the processing of your personal data.
- **Object.** Object to our reliance on our legitimate interests as the basis of our processing of your personal data that impacts your rights.

You may submit these requests by email to [dataprivacy@quinyx.com](mailto:dataprivacy@quinyx.com), contact our Data Protection Officer at [dpo@quinyx.com](mailto:dpo@quinyx.com), or our postal address provided [below](#). We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions.

If you would like to submit a complaint about our use of your personal data or our response to your requests regarding your personal data, you may contact our Data Protection Officer at [dpo@quinyx.com](mailto:dpo@quinyx.com) or at the contact information found [below](#). You can find your data protection regulator [here](#).

### Your Choices

**Opt out of marketing communications.** You may opt out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by contacting us at [dataprivacy@quinyx.com](mailto:dataprivacy@quinyx.com). You may continue to receive service-related and other non-marketing emails.

**Cookies & Browser Web Storage.** We may allow service providers and other third parties to use cookies and similar technologies to track your browsing activity over time and across the Service and third party websites. For more details, see our [Cookies and other technologies Policy](#).

**Targeted online advertising.** Some of the business partners that collect information about users' activities on or through the Service may be members of organizations or programs that provide choices to individuals regarding the use of their browsing behavior or mobile application usage for purposes of targeted advertising.

Users may opt out of receiving targeted advertising on websites through members of the Network Advertising Initiative by clicking [here](#) or the Digital Advertising Alliance by clicking [here](#). European users may opt out of receiving targeted advertising on websites through members of the European Interactive Digital Advertising Alliance by clicking [here](#), selecting the user's country, and then clicking "Choices" (or similarly titled link). Please note that we also may work with companies that offer their own opt-out mechanisms and may not participate in the opt-out mechanisms that we linked above.

In addition, your mobile device settings may provide functionality to limit our, or our partners', ability to engage in ad tracking or targeted advertising using the Google Advertising ID or Apple ID for Advertising associated with your mobile device.

If you choose to opt-out of targeted advertisements, you will still see advertisements online but they may not be relevant to you. Even if you do choose to opt out, not all companies that serve online behavioral advertising are included in this list, so you may still receive some cookies and tailored advertisements from companies that are not listed.

**Do Not Track.** Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" or similar signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

**Choosing not to share your personal data.** Where we are required by law to collect your personal data, or where we need your personal data in order to provide the Service to you, if you do not provide this information when requested (or you later ask to delete it), we may not be able to provide you with our services. We will tell you what information you must provide to receive the Service by designating it as required at the time of collection or through other appropriate means.

**Third-party platforms or social media networks.** If you choose to connect to the Service via a third-party platform or social media network, you may have the ability to limit the information that we may obtain from the third-party at the time you login to the Service using the third-party's authentication service or otherwise connect your account. Subsequently, you may be able to control your settings through the third-party's platform or service. For example, you may access and change your settings through the Facebook [settings page](#) for Apps and Websites. If you withdraw our ability to access certain information from a third-party platform or social media network, that choice will not apply to information that we have already received from that third-party.

### **Other Sites, Mobile Applications and Services**

The Service may contain links to other websites, mobile applications, and other online services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. In addition, our content may be included on web pages or in mobile applications or online services that are not associated with us. We do not control third party websites, mobile applications or online services, and we are not responsible for their actions. Other websites and services follow different rules regarding the collection, use and sharing of your personal data. We encourage you to read the privacy policies of the other websites and mobile applications and online services you use.

### **Security Practices**

The security of your personal data is important to us. We employ a number of organizational, technical and physical safeguards designed to protect the personal data we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal data. You can read more about our Information Security in regards to our Service by visiting:

[https://enjoy.quinyx.com/hubfs/iGoMoon2017/PDFs/Quinyx\\_Information\\_Security.pdf?t=1523976583623](https://enjoy.quinyx.com/hubfs/iGoMoon2017/PDFs/Quinyx_Information_Security.pdf?t=1523976583623).

We may modify our Information Security practices, in our sole discretion, at any time.

### **International Data Transfers**

We are headquartered in Sweden and have operations in the United States. In addition, we have service providers in the United States and other countries, and your personal data may be transferred to the United States or other locations outside of your state, province, or country where privacy laws may not be as protective as those in your state, province, or country.

If we transfer your personal data out of Europe to a country not deemed by the European Commission to provide an adequate level of personal data protection, the transfer will be performed:

- Pursuant to the recipient's compliance with standard contractual clauses, EU-US Privacy Shield (or Swiss-US Privacy Shield, as applicable), or Binding Corporate Rules;
- Pursuant to the consent of the individual to whom the personal data pertains; or
- As otherwise permitted by applicable European or national law.

You may contact us if you want further information on the specific mechanism used by us when transferring your personal data out of Europe.

### **Children**

The Service is not directed to, and we do not knowingly collect personal data from anyone under the age of 16. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us. We will delete such information from our files as soon as reasonably practicable. We encourage parents with concerns to [contact us](#).

### **Your California Privacy Rights**

Under California Civil Code section 1798.83, California residents are entitled to ask us for a notice identifying the categories of personal customer information which we share with our affiliates and/or third parties for marketing purposes, and providing contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this notice, please submit a written request to us via email at Quinyx AB (556704-4580), Vattugatan 17, 111 52 Stockholm, Sweden. You must put the statement "Your California Privacy Rights" in your request and include your name, street address, city, state, and ZIP code. We are not responsible for notices that are not labeled or sent properly, or do not have complete information.

### **Changes to this Privacy Policy**

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service. We may also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via e-mail (if you have an account where we have your contact information) or another manner through the Service.

Any modifications to this Privacy Policy will be effective upon our posting the new terms and/or upon implementation of the new changes on the Service (or as otherwise indicated at the time of posting). In all cases, your continued use of the Service after the posting of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy.

### **How to Contact Us**

Please direct any questions or comments about this Policy or privacy practices to [dataprivacy@quinyx.com](mailto:dataprivacy@quinyx.com). You may also write to us via postal mail at:

Quinyx AB (556704-4580)  
Vattugatan 17  
111 52 Stockholm, Sweden

## Cookie and Other Technologies Policy

This Cookie Policy explains how Quinyx AB and our subsidiaries and affiliates (“**Quinyx**”, “**we**”, “**us**” or “**our**”) use cookies and similar technologies in connection with the [www.Quinyx.com](http://www.Quinyx.com) website and any other website that we own or control and which posts or links to this Cookie Policy (collectively, the “**Sites**”).

### What are cookies?

Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies serve different purposes, like helping us understand how a site is being used, letting you navigate between pages efficiently, remembering your preferences and generally improving your browsing experience.

Our Sites may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer or mobile device until you delete them).

We use two broad categories of cookies: (1) first party cookies, served directly by us to your computer or mobile device, which we use to recognize your computer or mobile device when it revisits our Sites; and (2) third party cookies, which are served by service providers or business partners on our Sites, and can be used by these parties to recognize your computer or mobile device when it visits other websites. Third party cookies can be used for a variety of purposes, including site analytics, advertising and social media features.

### What types of cookies and similar tracking technologies does Quinyx use on the Sites?

On the Sites, we use cookies and other tracking technologies in the following categories described in the table below.

<b>Type</b>	<b>Description</b>	<b>Who serves the cookies</b> (link to privacy policy/site)	<b>How to control them</b>
<i>Advertising</i>	These cookies are used by advertising companies to collect information about how you use our Sites and other websites over time. These companies use this information to show you ads they believe will be relevant to you within our Service and elsewhere, and to measure how the ads perform.	<a href="#">Facebook</a> <a href="#">Twitter</a>	See ‘your choices’ below.

<i>Analytics</i>	These cookies help us understand how our Service is performing and being used. These cookies may work with web beacons included in emails we send to track which emails are opened and which links are clicked by recipients.	<a href="#">Google Analytics</a>  <a href="#">Mixpanel</a>	See 'your choices' below.  Google Analytics uses its own cookies. You can find out more information about Google Analytics cookies <a href="#">here</a> and about how Google protects your data <a href="#">here</a> . You can prevent the use of Google Analytics relating to your use of our Sites by downloading and installing a browser plugin available <a href="#">here</a> .
<i>Essential</i>	These cookies are necessary to allow the technical operation of our Service (e.g., they enable you to move around on a website and to use its features).	<a href="#">Google Tag Manager</a>	See 'your choices' below.
<i>Functionality/performance</i>	Enhance the performance and functionality of our Service.	<a href="#">Intercom</a>	See 'your choices' below.

### Other technologies

In addition to cookies, our Sites may use other technologies, such as Flash technology to pixel tags to collect information automatically.

#### *Browser Web Storage*

We may use browser web storage (including via HTML5), also known as locally stored objects (“LSOs”), for similar purposes as cookies. Browser web storage enables the storage of a larger amount of data than cookies. Your web browser may provide functionality to clear your browser web storage.

#### *Web Beacons*

We may also use web beacons (which are also known as pixel tags and clear GIFs) on our Sites and in our HTML formatted emails to track the actions of users on our Sites and interactions with our emails. Unlike cookies, which are stored on the hard drive of your computer or mobile device by a website, pixel tags are embedded invisibly on webpages or within HTML formatted emails. Pixel tags are used to demonstrate that a webpage was accessed or that certain content was viewed, typically to measure the success of our marketing campaigns or engagement with our emails and to compile statistics about usage of the Sites, so that we can manage our content more effectively.

## Your choices

Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. Please note that if you set your browser to disable cookies, the Sites may not work properly.

For more information about cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org). If you do not accept our cookies, you may experience some inconvenience in your use of our Sites. For example, we may not be able to recognize your computer or mobile device and you may need to log in every time you visit our Sites.

Users may opt out of receiving targeted advertising on websites through members of the Network Advertising Initiative by clicking [here](#) or the Digital Advertising Alliance by clicking [here](#). European users may opt out of receiving targeted advertising on websites through members of the European Interactive Digital Advertising Alliance by clicking [here](#), selecting the user's country, and then clicking "Choices" (or similarly-titled link). Please note that we also may work with companies that offer their own opt-out mechanisms and may not participate in the opt-out mechanisms that we linked above.

If you choose to opt-out of targeted advertisements, you will still see advertisements online but they may not be relevant to you. Even if you do choose to opt out, not all companies that serve online behavioral advertising are included in this list, and so you may still receive some cookies and tailored advertisements from companies that are not listed.

For more information about how we collect, use and share your information, see our [Privacy Policy](#).

## Changes

Information about the cookies we use may be updated from time to time, so please check back on a regular basis for any changes.

## Questions

If you have any questions about this Cookie Policy, please contact us by email at [dataprivacy@quinyx.com](mailto:dataprivacy@quinyx.com).

Last modified [REDACTED].