

# **Findity**

# **Privacy Policy**

**Expense Management.**  
**Simplified. For you.**



## Privacy Policy

### Introduction

This Privacy Policy (“Policy”) is an informative document about the processing of personal data that takes place within the framework of Findity’s (hereinafter “we”, “us”) account information service and the software Findity Platform. The policy is divided into different sections depending on whether we act as a controller or processor or sub-processor.

Regardless of the role we play or the product we use when processing your personal data, your privacy is important to us. If your personal data is processed by us, you should be able to trust that we treat it in a secure manner and with a high level of protection. You should also be able to feel confident that we have done our utmost to ensure that no third parties can access your data and that you know what data we process. We ensure that personal data is processed in accordance with the Norwegian Personal Data Act (15 May 2018 No. 38) and the General Data Protection Regulation (EU) 2016/679 (“**GDPR**”) with supplementary provisions to the EU Data Protection Regulation and the Norwegian Data Protection Authority’s regulations and general advice as well as other applicable legislation relating to the products (“**Applicable Data Protection Legislation**”).

When we process your personal data, we always have a legitimate purpose based on a legal basis for why we process your personal data. We ensure that we only process personal data that is justified in relation to the purposes for which we process the personal data. Our ambition is that the personal data we process about you should be correct, which means that we may need to delete the data if it turns out to be incorrect. Your personal data is not stored for longer than necessary, which means that we delete it if we no longer have a legal basis and a legitimate purpose for processing it.

### What is personal data?

Personal data is information about an identified or identifiable natural person. “Identifiable natural person” means a person who can be identified directly or indirectly by reference to an identifier, such as name, identification number, location information, online identifiers, or other factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity.

### What does personal data processing mean?

The processing of personal data refers to a measure or combination of measures related to personal data - whether automatic or not - such as collection, registration, organisation, structuring, storage, processing or alteration, production, reading, use, delivery, delivery by transfer, dissemination or other provision, adjustment or merger, limitation, deletion, or destruction.

### Processing of personal data in the role of data controller

Findity AB, corporate registration number 556838-8200, Box 108, 771 23 Ludvika, Sweden, (“**Findity**”) is the controller for the personal data processed for users of the account information service and for the processing of personal data as set out below for contact persons for customers/partners using the software Findity Platform. This means that we are never controller in relation to the users of Findity

Platform. Findity is the controller when we determine the purpose and manner in which personal data is to be processed.

The account information service and the Findity Platform is hereinafter referred to as (the “**Products**”).

### **Why do we process personal data and what kind of personal data is processed?**

We process personal data of customers, partners and users of our Products.

“Customers” means companies that have entered into an agreement with us. We process personal data as controllers relating to the customer’s contact persons.

“Partner” means companies that we have entered into an agreement with regarding their right to provide our software to their customers in their own name. We process personal data as controllers relating to the partner’s contact persons.

“Users” means the persons who uses the software through a customer or partner. We process personal data as processors relating to the users and we have entered into separate data processing agreements with the customer or partner that are the controller regarding the processing of the users’ personal data.

### **Customer agreement**

In order for us to be able to manage customer relationships in connection with the Products, we must process personal data about our customers’ and partners’ contact persons as well as personal data about users of our Products where we are the controller. The personal data collected primarily includes name, telephone number, company name, title, and e-mail address. The processing is based on the legal basis that the processing is necessary for the performance of a contract to which the customer is party and for compliance with a legal obligation or for the purposes of the legitimate interests pursued by the controller in processing the personal data. A detailed description of what personal data we process within the framework of our Products can be found in the appendices to this Policy.

Personal data relating to manage customer relationships is primarily processed with the purpose to:

- Manage sales and contract processes with customers.
- At the customer’s request provide offers for products.
- Market the Products.
- Provide support to users of the Products.
- Improve the functionality and ease of use of Products.
- To manage customer agreements by, for example, invoicing.
- To be able to reach contact persons and users.

### **Potential customers**

We collect personal data about potential customers in order to carry out marketing measures. The personal data collected primarily includes name, telephone number, company name, title, and e-mail

address. Personal data is collected at, for example, trade fairs, from public registers and company websites, as well as from our own contact form on our website. The personal data is then used to book meetings with potential customers, send out newsletters and send invitations to our events or webinars.

The legal basis for our processing of personal data about potential customers is our commercially legitimate interest in processing the personal data. We will ensure that our marketing mailings will be handled in accordance with the Norwegian Marketing Act. The persons whose data we process may choose not to receive our marketing mailings and that the data processed is not of a sensitive nature.

For visitors to our website, IP addresses are stored in access logs. This information is anonymized.

For visitors to our website, we use cookies. How we use cookies is described in our cookie policy, see [our website](#).

### **How do we collect personal data?**

The personal data that we process is primarily collected directly from you. However, in the case of our customers, we may also collect personal data from any other person who is also employed by the customer or partner.

We may also collect personal data from public registers, websites or when you register as a service user in our Products. We may also collect your personal data from partners.

We may also process personal data in the form of images that you upload in the products, such as images of receipts. The amount of personal data we collect in connection with these images varies depending on the document that has been photographed.

### **How do we share your personal data?**

We may share your personal data with third parties, for example in the following situations:

#### **Suppliers**

We share your personal data with partners and suppliers. These may be suppliers of servers, web agencies or other partners that we work with to deliver our products.

#### **Authorities**

In certain situations, authorities may request that personal data is disclosed to an authority. In such situations, we will only disclose personal data if there is a decision from the authority that requires the personal data to be disclosed.

#### **Transactions**

In connection with an acquisition, merger with another company or a division of one of the companies in the Findity group, the acquiring company and/or its hired consultants may require access to certain personal data that we process about you. In the event of such disclosure, we will ensure that the person receiving the personal data is covered by a confidentiality agreement.



**Your rights**

You can choose not to receive marketing from us by either:

- a) follow the instructions to opt out of our communication, or
- b) contact us via the contact forms on our website.

**Fundamental rights**

You have the right to access your personal data that we process and to review it. You also have the right to request data portability of the personal data processed. If the personal data we process about you is incorrect, you can request that we correct it.

You have the right to request that the personal data we process about you is deleted. If you request deletion, we must delete the personal data if your right of deletion is not superseded by an obligation for us by law or other requirements applicable to us to store your personal data and if i) the personal data is no longer needed for the purpose for which it was collected, ii) you withdraw your consent, iii) the personal data is processed illegally, or iv) the personal data must be deleted for legal reasons. You also have the right to request that our processing of your personal data be restricted and the right to object to our processing of your personal data.

If you have any questions or would like to exercise your rights, you can contact our Data Protection Officer at [privacy@findity.com](mailto:privacy@findity.com).

If you have objections or comments about our processing of personal data, you can also contact the Norwegian Data Protection Authority at the following address:

The Norwegian Data Protection Authority  
P.O.Box 458 Sentrum  
0105 Oslo

Norway When you contact us to assert your rights, we may request ID documents or copies of ID documents in order for you to verify your identity. We process this personal data so that we can fulfill our obligations in accordance with applicable law. This information will be deleted as soon as we have verified your identity.

**How we process and store your personal data**

When we process your personal data, everyone in our business is obliged to comply with applicable data protection legislation and as set out in this document in order to maintain a high level of protection of your privacy.

When we process your personal data, we must:

- prevent unauthorized access to your personal data,
- prevent the dissemination of your personal data, and
- prevent other deviations when we process your personal data.

We ensure that your personal data is treated confidentially, that your privacy is not compromised by our processing of personal data and that we guarantee access to personal data in accordance with applicable data protection legislation.

In order to achieve an appropriate level of protection when processing your personal data, we use reasonable technical and organizational measures. The reasonableness is assessed based on the category of personal data that we process in relation to the risk that may arise in the event of a breach of our systems or operations and the costs of putting in place safeguards.

#### **Organisational measures**

- We have appointed a data protection officer.
- We have set up processes for how we should act in the event of a data breach.
- We hold regular training sessions for our employees on issues related to the processing of personal data.
- We have a data processing agreement with all our suppliers and other interested parties who process personal data on our behalf.
- We have established instructions for IT management within the organization.

#### **Technical measures**

- We use 256-bit encryption (128-bit for some older phones with hardware limitations) and 2048-bit keys.
- All communications to and from users are encrypted with TLS. Data stored in server environments is encrypted with ZFS encryption.
- Malware detection and prevent controls run regularly using rootkit detection and removal tools.
- IDS/IDP monitors continuously check and delete malware.
- Our Products are in operation on servers in data centers that are monitored and staffed 24/7.
- All data is stored in two different locations in Sweden.
- Data is backed up every hour.
- The data centers are climate-controlled and fire-resistant.
- The data centers are equipped with secondary power supplies and diesel generators to ensure the power supply to the servers.
- Our server environment and networks are protected by firewalls.

#### **How long do we process your personal data?**

We will process your personal data for as long as it is necessary for the purpose for which we have collected the personal data and as long as we have a legal basis for the processing of the personal data. This means that we may process your personal data for some time after a contractual relationship has ended. As soon as we no longer need the personal data or have no legal basis to process it, we will delete it.

#### **Processing of personal data in the capacity as a processor / sub-processor**

As part of our provision of the Products, we will, under certain conditions, process personal data about users and customer representatives on behalf of our customers and partners and direct customer

transactions, as these parties have been granted the right to provide the Products in their own name. In these situations, our customers and partners determine the purposes and manner of processing of personal data. This means that in these situations we only process personal data on behalf of the customer or partner and that we may only process such personal data in accordance with the instructions they give us. The relationship between us and such a partner or customer is governed by a data processing agreement.

When our customers or partners are the controllers and responsible for personal data, it is the customer or partner who must ensure that they have a legal basis for processing the personal data and that the data subjects are informed in accordance with the requirements of applicable data protection legislation.

When our customers or partners use the Products, we must ensure that the Products comply with the requirements of applicable data protection legislation. We will also work with our customers and partners to enable them to fulfill their obligations to those whose personal data is processed.

#### **Use of data processors and sub-processors**

In our processing of personal data, we may in certain situations use third party actors to process personal data on our behalf. When we instruct these processors or subcontractors to process personal data on our behalf, the personal data will, as a rule, not be processed outside the EU/EEA.

When we instruct these processors or sub-processors to process personal data on our behalf, we ensure that they can meet the requirements for processing personal data in accordance with applicable data protection legislation. We always enter into personal data processing agreements with such actors to ensure that they meet these requirements. If the person we are commissioning is an actor who may process your personal data outside the EU/EEA, we will ensure that we take the necessary measures required by applicable data protection legislation for a transfer to a country outside the EU/EEA to be considered legal. A full list of our Subcontractors can be found in Annex 2.

#### **Links to other websites**

If our website contains links to third-party websites or material posted by third parties, these links are for information purposes only. Since we have no control over the material or processing of personal data on these pages, we assume no responsibility for the processing of personal data in connection with such pages.

#### **Changes to this policy**

If this policy changes, an updated version of the document will be made available on our website. Therefore, in order to keep you updated on its content, we recommend that you visit our website regularly. If we make significant changes to this document, such as changing the purpose of processing personal data, we will also send you an email or post a message through our social media.

#### **Contact**

If you have any questions about this policy, your personal data or if you suspect that we are violating your rights, please contact us in one of the following ways:



Findity AB  
P.O. Box 108  
771 23 Ludvika  
Sweden  
Email: [privacy@findity.com](mailto:privacy@findity.com)





## ANNEX 1

### Account Information Service

Personal data	Purpose of the processing	Legal basis
<ul style="list-style-type: none"> <li>● Name</li> <li>● Social Security Number</li> </ul>	<p>The processing is necessary for us to be able to enter into agreements and deliver the service to the user. The personal data is used to identify the user.</p> <p>The personal data is also processed in order for us to be able to defend ourselves if legal claims are made against us by users.</p>	<p>6.1 b) necessary to fulfill contracts</p> <p>6.1 f) in the legitimate interest of the controller.</p> <p><u>Reason</u> We process the personal data in order to defend ourselves if users make legal claims against us. We have established that we have a commercial legitimate interest in processing your personal data for this purpose. We believe that our interest in being able to defend ourselves in legal proceedings outweighs the risks to your privacy, especially given that we must be able to protect our interests in any litigation and that the personal data processed is not of a sensitive nature.</p> <p>The Social Security Number is necessary to use to ensure secure identification.</p>
<ul style="list-style-type: none"> <li>● E-mail address</li> </ul>	<p>Used for the user to be able to register in the service and e.g. send receipts via e-mail and for us to be able to communicate with the user.</p> <p>Email address is also used to enable us to send marketing</p>	<p>6.1 b) necessary to fulfill contracts</p> <p>6.1 f) in the legitimate interest of the controller.</p>



	material about our current and future services.	<p><u>Reason</u> We process your personal data to provide you with marketing materials about our current and future services.</p> <p>We have established that we have a commercial legitimate interest in processing your personal data for this purpose. We do not believe that our interest in being able to market our Products poses a risk to your privacy as no sensitive personal data s processed. You may also choose to opt out of receiving our marketing mailings by following the instructions we send or by contacting us.</p>
<ul style="list-style-type: none"> <li>• Address</li> </ul>	To be able to invoice the user using physical postal services when the service is charged if the customer has chosen to receive invoices by post.	6.1 b) necessary to fulfill contracts
<ul style="list-style-type: none"> <li>• Affiliation</li> </ul>	Processed in order for the employer to be able	6.1 f) of legitimate interest to third parties

<ul style="list-style-type: none"> <li>Employee ID number</li> </ul>	<p>to record expenses that an employee registers in the service as a user.</p>	<p><u>Reason</u> The data subject's employer has a commercial and legally legitimate interest in processing personal data for this purpose. The personal data processed is not of a sensitive nature and is necessary for the employer to fulfill its obligations from an accounting perspective and in relation to the employee.</p>
<ul style="list-style-type: none"> <li>Profile picture</li> </ul>	<p>The profile picture makes the user visible in the service. The user can choose to upload a profile picture and delete the profile picture if desired.</p>	<p>6.1 f) of legitimate interest to third parties.</p> <p><u>Reason</u> We have a legitimate interest in processing a user's profile picture if the user chooses to upload a profile picture. The user can also choose to delete the profile picture whenever he or she wants. Therefore, we believe that our legitimate interest outweighs the risk of the data subject's privacy being violated</p>
<ul style="list-style-type: none"> <li>Bank account data</li> </ul>	<p>Processing is necessary for us to be able to compare an expense from a company card with a receipt in the service.</p>	<p>6.1 b) necessary to fulfill contracts.</p>

<ul style="list-style-type: none"> <li>• Receipt information</li> </ul>	<p>The information displayed on receipts is processed so that we can match a receipt with an expense that a user has paid with their business card. The information is necessary for the service to be used.</p> <p>The personal data is also processed in order for us to be able to defend ourselves if users make legal claims against us.</p>	<p>6.1 b) necessary to fulfill contracts.</p> <p>6.1 f) in the legitimate interest of the controller</p> <p><u>Reasons</u> We process the personal data in order to defend ourselves in the event of legal claims against us from users.</p> <p>We have established that we have a commercial legitimate interest in processing your personal data for this purpose. We believe that our interest in being able to defend ourselves in legal proceedings outweighs the risks to your privacy, especially given that we must be able to protect our interests in any litigation and that the personal data processed is not of a sensitive nature.</p>
<ul style="list-style-type: none"> <li>• Participating in entertainment and hosting, participants' names, and email addresses.</li> </ul>	<p>Processed so that the registered user can report entertainment/hospitality income in the service.</p>	<p>6.1 f) of legitimate interest to third parties</p> <p><u>Reasons</u> The employer has a legal and commercially justified interest in processing personal data about participants in entertainment/hospitality events. The personal data processed must be processed in accordance with the law, the data is not of a sensitive nature and, taking into account the safeguards we apply, we believe that this legitimate interest outweighs the risks associated with the</p>

### Findity Platform

Personal data	Purpose of the processing	Legal basis
<ul style="list-style-type: none"> <li>Name</li> <li>E-mail address</li> <li>Phone number</li> </ul>	<p>The personal data relates to the customer's or partner's contact person and is processed in order to be able to conduct a dialogue about the contractual relationship.</p> <p>Information about a customer's or partner's contact person who contacts us in connection with support matters can be processed.</p>	<p>6.1 f) Of legitimate interest to the controller</p> <p><u>Reasons</u></p> <p>We have a commercially legitimate interest in processing this personal data for this purpose in order to maintain a good customer relationship with our partners and customers and to be able to work with support issues reported to us.</p> <p>The personal data processed is not of a sensitive nature and is generally subject to our technical and organizational security measures. Therefore, our assessment is that the processing of it does not interfere with the privacy associated with the personal data that we process.</p>

### ANNEX 2

Sub-processor	Product	Region	Functionality	Data
Infobip Ltd.	Infobip	Within the EU/EEA/ United Kingdom*	Product messages - Text	Name, phone number
UC AB	Alla Bolag	Within the EU/EES	Company information	The company's corporate identity number at the time of setting up the company's account.

\* The UK received the European Commission's Adequacy decision on 28 June 2021.