

PRIVACY POLICY

1. COLLECTION AND USE OF PERSONAL DATA

- 1.1. iconik Media AB (corporate reg. no. 559208-7695) ("**Iconik**") is the personal data controller for the processing of personal data in connection with the use of Iconik's cloud based media management and collaboration platform, iconik (the "**Platform**"). This privacy policy (the "**Privacy Policy**") applies to the data processing carried out by Iconik on its website in connection with offering the services relating to the Platform ("**Services**"). Services are governed by the terms of service between Iconik and the customer who has entered into an agreement for access and use of the Services. Through this Privacy Policy, we inform you about our processing of your personal data in connection therewith and of related rights.
- 1.2. Personal data is all and any kind of data that, directly or indirectly, can be used to identify a natural person.
- 1.3. You will be asked to provide personal data in order to set up a user account to use the Platform and the Services. The collected personal data will include user's full name and e-mail address, as well as information regarding the use of the Platform. If you choose to provide such information, Iconik will also process data concerning chosen alias and phone number.
- 1.4. If you choose to purchase credits through invoice, Iconik will, in addition to the information prescribed in 1.3 above, need an address to which invoices should be sent, as well as other (company) billing information, being name of contact person and company VAT-number.
- 1.5. Iconik may also have received your personal data from a third party, through user directory services. In such cases, Iconik will notify you of the processing of your personal data within four weeks from the commencement of processing.
- 1.6. Iconik uses the personal data to manage the user account as well as to communicate with users and to send relevant notices. The personal data is therefore necessary in order for Iconik to administrate the accounts and use of the Platform and the provision of Services in accordance with the Services terms.
- 1.7. Subject to the below, Iconik may also collect and use personal data to operate and improve the Platform, Iconik's website, services and products, and to make them easier to use. The personal data may also be used for research and data analysis for the same purpose.

2. YOUR RIGHTS

- 2.1. You may request access to the processed personal data, as well as request changes, corrections or deletion of any inaccurate data, etc. in accordance with rights you may have under applicable law, as summarized below.
- 2.2. Processing of personal data is subject to the General Data Protection Regulation (EU) 2016/679 ("**GDPR**") and other applicable legislation for the protection of privacy, which grants you certain rights as an individual. These rights, subject to applicable limitations and exceptions, include the following:
 - i) Right of Access - the right to be informed of and request access to the personal data we process about you;

- ii) Right to Rectification - the right to request that we amend or update your personal data where it is inaccurate or incomplete;
- iii) Right to Erasure - the right to request that we delete your personal data;
- iv) Right to Restrict - the right to request a temporary or permanent stop of processing all or some of the personal data;
- v) Right to Object;
 - the right, at any time, to object to processing personal data on grounds relating to your situation;
 - the right to object to your personal data being processed for direct marketing purposes;
- vi) Right to Data Portability - the right to request a copy of your personal data in electronic format and the right to transmit that personal data for use in another party's service; and
- vii) Right not to be subject to Automated Decision-making - the right to not be subject to a decision based solely on automated decision making, including profiling, where the decision would have a legal effect on you or produce a similarly significant effect.

2.3. Requests and queries shall be sent in writing to Iconik Media AB on the address set out under clause 8, below. In addition, users may at all times make changes to the processed personal data on the user account. If you are dissatisfied with our processing of personal data, you may lodge a complaint with the Swedish Data Protection Authority (*Datainspektionen*) or with your local Data Protection Authority

2.4. Iconik is cautious of your privacy and integrity and makes its best efforts to safeguard your personal data. Should you nevertheless have remarks on the processing, you are most welcome to contact us on the abovementioned contact information. You are also always entitled to contact the supervisory authority.

2.5. If a user uploads images, video or other content that holds personal data, or adds metadata, either manually, using the available API's, or in any other way possible, containing personal data on already existing media assets or content, said user is the personal data controller for such information and is thus fully responsible for the processing of such information and that the processing of the information is compliant with applicable laws (including the GDPR). Said user will control the purpose for the processing of such personal data. Iconik will be the personal data processor for such processing and will not process the personal data for any other purpose than storage on behalf of the user.

2.6. Processing of personal data is described in more detail in the iconik Data Processing Agreement, as applicable and as required by the GDPR.

3. HOW WE COLLECT PERSONAL DATA

3.1. Without affecting the foregoing, we collect personal data from you:

- i) When you sign up for an account to use the Services;
- ii) Through your use of the Services;

- iii) If you engage with a third-party that integrates with the Services and transfers your personal data to us (where applicable).

3.1.2. We use anonymised and aggregated data for analysing our software systems and to perform maintenance and development in regard to these.

4. BASIS FOR USE OF PERSONAL DATA

4.1. We use your account information to provide the Services, continuously maintain and develop the Services further and to communicate with you. This is done on the basis of performing our customer contract (point (b) of Article 6(1) GDPR) and our legitimate interest (point (f) of Article 6(1) GDPR).

4.2. We may use your account information to detect fraudulent activities. This is done on the basis of performing our customer contract (point (b) of Article 6(1) GDPR), and our legitimate interest (point (f) of Article 6(1) GDPR) and compliance with legal obligations (point (c) of Article 6(1) GDPR). We use your personal data for marketing, research and for promotional purposes. This is done on the basis of consent (point (a) of Article 6(1) GDPR) and our legitimate interest (point (f) of Article 6(1) GDPR), respectively.

5. RETENTION OF PERSONAL DATA

5.1. We keep your personal data only as long as necessary to provide you with the services and for legitimate and essential business purposes, such as maintaining the performance of the services, making decisions about new features and offerings, complying with our legal obligations and protecting our legal rights and resolving disputes. We keep some of your personal data for as long as you are a user of the Services.

5.2. If you request, we will delete or anonymise your personal data so that it no longer identifies you, unless we are legally allowed or required to maintain certain personal data (and/or unless the personal data forms part of customer content uploaded to the Platform/Services; in which case you will need to contact the customer for the Services on whose behalf we are processing such data), including situations such as the following:

- If there is an unresolved issue relating to your account, such as an outstanding credit on your account or an unresolved claim or dispute we will retain the necessary personal data until the issue is resolved;
- Where we are required to retain the personal data for our legal, tax, audit, and accounting obligations, we will retain the necessary personal data for the period required by applicable law; and/or
- Where necessary for our legitimate business interests such as fraud prevention or to maintain the security of our users.

6. TRANSFER OF PERSONAL DATA

6.1. Iconik and its affiliates may share user's personal data with each other and use it in consistency with this privacy policy.

6.2. We may also subcontract processing to, or share your personal data with, third parties located in countries other than your home country. Personal data collected within the European Union and the EEA may be transferred to and processed by third parties located in a country outside of the European Union and the EEA. We will in such case ensure that the transfer of your personal data is carried out in conformity with applicable law and that all appropriate contractual, technical, and organisational measures are in place such as the Standard Contractual Clauses approved by the EU Commission (or

any amendment or replacement thereof). However, Iconik will not share personal data with third parties for their marketing purposes, unless Iconik has received explicit consent to such use

7. CHANGES

- 7.1. We may occasionally make changes to this Privacy Policy. When we do so, we will provide you with prominent notice as appropriate under the circumstances, e.g. by displaying a prominent notice within the Service or by sending you an e-mail. Please, therefore, make sure you read any such notices carefully.

8. CONTACT INFORMATION

- 8.1. If you have any questions or requests in relation to this Privacy Policy, please send these to the address below:

Iconik Media AB
c/o: Cantemo AB,
P.O. Box 45001
SE-104 30 Stockholm,
Sweden
E-mail: privacy@iconik.io

- 8.2. Iconik Media AB (Swedish company Reg. No.: 559208-7695) is the data controller for the purposes of this Privacy Policy.

9. COOKIES AND OTHER TECHNOLOGIES

- 9.1. Iconik may use technologies, such as cookies, to collect information about the page's users' view, the links users' click and other actions users take on Iconik's services. Cookies are small text files that are stored on the hard drive through web browsers.

- 9.2. Iconik may use cookies in order to store a user's preferences and other information on the user's computer in order to save time by eliminating the need to repeatedly enter the same information, for example by remembering personal information when using the Platform, and to display user's personalized content and targeted advertising upon later visits to its websites. However, the cookies used on Iconik's websites does not normally contain information that identifies users personally.

Cookies on Iconik's websites

- 9.3. Iconik uses session cookies as well as persistent cookies on its websites. A session cookie is a temporary cookie which is erased when a session is ended, i.e. usually when the browser is closed, while a persistent cookie is stored in one of the browser's subfolders until deleted manually or the set duration period of the persistent cookie expires.

- 9.4. Iconik uses cookies such as `ph_hasloggedin` in order to determine whether to show "sign up" or "log in" when prompting a user to log in, `ph_st_variants` in order to determine which version of a page to show to a user, and `ph_sessionid` in order to remember information about a logged in user.

Third party cookies on Iconik's websites

- 9.5. Iconik also uses third party cookies. Third party cookies may be necessary in order for third parties to provide its services to Iconik. Iconik uses third party cookies such as `__ga` in order to access e.g. Google Analytics data.

- 9.6. Users have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but this can be avoided through modifying the settings to decline cookies as well as delete existing cookies from the device. If users choose to decline and/or delete cookies, they may not be able to use all features of Iconik's websites or services that depend on use of cookies.

This text was last updated 29 June 2020