

Data Privacy Notice JonDeTech

1. Introduction

This Data Privacy Notice (this “**Notice**”) applies to JonDeTech Sensors AB (publ.), with corporate ID number 556951-8532, (“**JonDeTech**”, “**us**” or “**we**”) when we process personal data about you when you visit our website, inform you about our products and services, engage you as a new customer or business partner, or when you contact us for general queries. More information about us can be found by clicking on [About us](#).

When we refer to “personal data” in this Notice, we mean any information that directly or indirectly can identify you as a natural person and any other information that qualify as personal data under applicable data protection law, including the General Data Protection Regulation 2016/679 (the “**GDPR**”). JonDeTech always aim to process personal data in accordance with the GDPR and other applicable national data protection law. For example, we will only process personal data set out herein if we have a legal ground to do so, and to the extent necessary to fulfil the purposes set out in this Notice.

As explained in this Notice, we will under certain lawful circumstances transfer your personal data to third parties, and in some instances to a different country to the country in which you live or work. Such country may be located outside the EU/EEA. Please see “**Transfer outside the EU/EEA**” for further information below.

You have certain rights relating to how we process your personal data. You have the right to object to the processing of your personal data, to request access to and rectification of your personal data, to request restriction of the processing and erasure of your personal data, and to request data portability. Please see “**What rights do I have as a registered person?**” for further information and how to enforce your rights.

2. Personal data processed by us

We mainly process the following categories of personal data about you under this Notice:

Basic personal information: for example contact information (name, postal address, email address, Skype name, telephone number and company position/title).

Communications data: communications to and from us and related information stored or processed for example in our IT systems or in our email service and information collected on our website.

Job application details: if you send us a job application, we will process information such as personal data in your resume, cover letter, your picture, experience, skills, educational background, interests, referees and other information you disclose in a job application.

We must ask you to never provide any data to us that could be considered sensitive (for example health data, political and/or religious beliefs or biometric data) or information about criminal offences.

Our purposes for processing your personal data, wherefrom we receive your personal data, how long we save it and our legal grounds for the processing is disclosed in the "Data Processing Table" below.

3. To what categories of third parties will my personal data be disclosed to?

Group companies

Your personal data set out herein, depending on the purpose of the processing, may be transferred to our affiliates in order to fulfil our purposes with the processing described in this Notice.

Service providers

We use third party service providers ("**Service Providers**"), which perform certain services as requested by us that involve the processing of your personal data. Such services include provision of communication systems (for example email system), IT systems and support, document management systems, accounting and invoicing services and website services.

Only personal data that is necessary for the fulfillment of the relevant and respective purpose will be provided to our Service Providers. A Service Provider must only process personal data to perform the specific services requested by us and will always be obliged, under a written agreement, to act in accordance with our instructions, to follow applicable law and to implement appropriate technical and organizational measures for the protection of your personal data.

Authorities and other data controllers

Personal data may be disclosed to relevant authorities (e.g. the police, courts and the tax authority) to fulfil legal obligations.

4. How we keep your personal data secure

JonDeTech has taken necessary and appropriate technical and organizational measures to ensure adequate protection of your personal data. Access to your personal data is limited and only authorized JonDeTech personnel have access to your personal data on a "need-to-know" basis, and have committed themselves to necessary confidentiality undertakings. In case we should receive personal data from you that we need to process for another purpose, we will inform you accordingly.

5. Transfer outside the EU/EEA

We always aim to process your personal data within the EU/EEA. However, in order to fulfil our purposes herein, personal data may be transferred to our Service Providers which may be established in or provide support functions from other countries. Such other countries may offer a lower level of protection for personal data than the country where you live. We only transfer your personal data if it is ensured that the personal data is adequately protected by the receiving parties in such countries and the transfer can be made under applicable law.

Adequate protection may typically be to impose on the receiving party contractual obligations, stipulating that such party maintains the same high level of privacy and data security as practiced by JonDeTech, according to applicable law and the GDPR. Such safeguards are for example the [EU Commissions Standard Contractual Clauses](#) and/or the [EU-U.S. Privacy Shield](#) (for transfers to the U.S.), which therefore imply lawful mechanisms for such third country transfer of personal data.

6. What rights do I have as a registered person?

You have several rights when it comes to our use of your Personal data. A summary of these rights are set out below.

Right to object

You have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data where the processing is based on the legal ground of public interest or when we base the processing on a legitimate interest. You also have the right to object to the processing for direct marketing purposes, including profiling.

If you lodge an objection, we will no longer process your personal data that we process based on a legitimate interest, unless we can demonstrate compelling and legitimate grounds for such processing which overrides your privacy interest or for the establishment, exercise or defence of legal claims. If you object to processing for direct marketing purposes, including profiling, we will immediately stop processing your personal data for that purpose.

Even if you object to certain processing, we may still continue such processing if permitted or obligated to do so under applicable legislation, for example to be able to fulfil legal requirements or to fulfil contractual obligations in relation to you.

Right to access and rectification

You always have the right to request access to your personal data. This includes the right to:

- be informed whether or not personal data about you is being processed;
- the type of personal data that is being processed; and
- the purpose of such processing.

You also have the right, upon request, to access information about any legitimate interest assessment we are required to conduct, when we process your personal data based on our legitimate interest.

Furthermore, you have the right to rectify or complete personal data if the personal data is inaccurate or incomplete. As soon as we become aware of any inaccurate personal data being processed, we will always rectify such personal data without undue delay and notify you accordingly.

Right to restriction

You have the right to request restriction of the processing of your personal data, if:

- you contest the accuracy of the personal data, and we must restrict the processing for a certain period to enable us to verify the accuracy of relevant data;
- the processing is unlawful and you oppose the erasure of the personal data but instead request restriction of the use;
- the processing is no longer necessary for the purposes it was collected or otherwise processed as stipulated in the "**Data Processing Table**" in this Notice, but the personal data is required by you for the establishment, exercise or defence of a legal claim; or
- you have objected to processing pursuant to what is set out under the Section "right to object" above, and our verification of the legitimate grounds is pending.

Right to erasure

You may also request us to erase your personal data if, for example:

- the personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
- you object to the processing of your personal data, in accordance with the "right to object" as set out above, and we do not have an overriding legitimate interest;
- the processing is unlawful; or
- the personal data has to be erased to enable us to comply with a legal requirement.

If you have any questions about your right to erasure, please use the contact details stated below. However, please note that even if you request erasure of your personal data, we may still continue to process it if we have a legal ground to do so.

Right to data portability

If you request access to your personal data that you have provided to us yourself, and (i) the personal data is being processed automatically and (ii) in accordance with a contract between you and us, or you have provided your consent to the processing, you may request that the personal data is provided in a structured, commonly used and machine-readable format, and you may also request that the personal data is transmitted to another controller, if this is technically feasible.

Right to withdraw your consent

You may at any time withdraw your consent, if we have asked you to give your consent for certain processing purposes as stated in the "**Data Processing Table**" below.

Please see how you can make use of this right under the section "**How do I make use of my rights?**" below.

7. How do I make use of my rights?

Please send an email to the relevant contact person, as specified below, if you want to make a request in relation to the processing of your personal data. Please note that we may contact you and ask you to confirm your identity to ensure that we do not disclose your personal data to any unauthorized person. We may ask you to specify your request before we perform any actions.

Once we have confirmed your identity, we will handle your request in accordance with applicable law. Please note that even if you object to certain processing of personal data, we may still continue the processing if permitted or required to do so by law, for example to enable us to fulfil legal requirements or to exercise, enforce or defend our business from legal claims.

You always have the right to lodge a complaint with the relevant authority in particular where you live, work or where an alleged infringement of the GDPR has occurred. The relevant data protection authority in each country can be found [here](#). The competent data protection authority in Sweden is [Datainspektionen](#).

8. Updates to this Notice

In order to ensure that we comply with data protection law, this Notice may be changed by us at any time. We will publish any changes made.

Please notify us of any changes to the personal data relating to you to enable us to process personal data accurately and securely (see contact details below).

9. Contact details

If you have any questions about our processing of your personal data, or want to enforce your data subject rights as stated above, please contact us at the below contact details:

[info@jondetech.com]

Latest update on [2] [August] 2020

Data Processing Table

Personal data type and source	Purpose	Legal ground	Retention time or criteria
<p>Basic personal information: for example contact information (name, postal address, email address, Skype name, telephone number and company position/title).</p> <p>Source: Directly from you (collected from face-to-face meetings, calls, email conversations and similar), or from publicly available sources (for example public databases and websites).</p>	In order for us to reach out and engage new clients and/or to engage new projects with existing clients.	Legitimate interest	The personal data is stored until the purpose is fulfilled with the processing, or until you have opted out from the processing, and will thereafter be deleted unless we have another legal ground and purpose to process the personal data (which we will inform you about, in such case).
	In order for us to reach out and engage business partners.		
	To communicate with you and to respond to your questions.		
	To market our products and services to you, including sending you our newsletters and/or press releases (which you may opt-out to at any time).		
<p>Communications data: communications to and from us and related information stored or processed on our IT systems, email system or information collected on our website.</p> <p>Source: Collected through our website or in our IT systems.</p>	To communicate with you and to respond to your questions.	Legitimate interest	The personal data is stored until the purpose is fulfilled with the processing, or until you have opted out from the processing, and will thereafter be deleted, unless we have another legal ground and purpose to process the personal data (which we will inform you about, in such case).
	To market our products and services to you, including sending you our newsletters and/or press releases (which you may opt-out to at any time).		
<p>Job application details: if you send us a job application, we will process information such as personal data in your resume, cover letter, your picture, experience, skills, educational background, interests, referees and other information you disclose in a job application.</p> <p>Source: Directly from you</p>	In order to administer your application and to contact you for interviews and similar pre-employment administration.	Legitimate interest	The personal data is stored until the purpose is fulfilled with the processing, i.e. you have been hired, and will in such case be moved to our employee register (which we inform of in a separate privacy notice). If you are not successful with the application and unless you have opted out from our processing of your job application details, we will delete your application after 2 years.
<p>Legal claims and personal data: In terms of legal claims related to the above purposes, we will store the information in the table above in order to defend ourselves in or from claims and to be compliant with mandatory law for a period of maximum ten (10) years in terms of any claims. However, we will minimize such information and only store the information necessary to fulfil this purpose. The personal data will, after this purpose has been fulfilled, be deleted.</p>			