

## Privacy Notice

Hemla Group AB (“**Hemla**”, “**we**”, “**us**”, or “**our**”) is committed to protecting and respecting your privacy. It is important for us to process your personal data responsibly and securely, in accordance with applicable laws and regulations, including the General Data Protection Regulation (“**GDPR**”). This Privacy Notice explains how we collect, use, store, and protect your personal data when you come in contact with our business and when you join our waiting list for the launch of our home security services. It outlines how your data is processed, what rights you have, and how you can exercise those rights.

### 1. Data Controller

1.1 The Data Controller responsible for processing your personal data is:

Hemla Group AB, 559477-8358  
Box 3309  
103 66 Stockholm  
e-mail: [privacy@hemla.com](mailto:privacy@hemla.com)

### 2. Personal Data We Collect

2.1 The personal data we collect includes the following:

- Name
- City you live in
- Phone number
- Email address
- Why you are interested in our home security services
- How you heard about our services

### 3. Purpose of Processing

3.1 We collect and process this personal data for the following purposes:

- To include you on the waiting list for the launch of our home security services.
- To contact you with updates about our service launch, special offers, and other related information that may interest you, including in the form of direct or e-mail marketing.
- To better understand your interest in home security services.
- To offer you relevant content.
- To offer, provide, analyze, follow up, improve, develop and maintain our services and offerings, programs, tools, website, app and other digital channels, as well as to analyze, follow up, improve and develop the quality and execution of what we deliver and offer, as well as the user experience and interaction with us.

### 4. Legal Basis for Processing

4.1 We process your personal data based on the following lawful bases under the GDPR:

- **Consent (Article 6(1)(a))**: By providing your personal data, you have given your clear consent for us to process your personal data for the purposes listed above, including for direct and e-mail marketing.
- **Balancing of Interests (Article 6(1)(f))**: We have a legitimate and justified interest in processing your personal data to administer, evaluate, and develop our

services, and to create offers we believe might be of interest to you. In balancing our legitimate interests with your rights and freedoms, we have determined that our processing of your personal data is necessary for the effective functioning of developing and offering our services, without unduly infringing on your privacy.

- 4.2 You have the right to object to this processing at any time. To exercise this right, or to withdraw your consent, including your consent to direct or e-mail marketing, please contact us using the details provided in this notice.

## **5. How We Share Your Personal Data**

- 5.1 We do not share your personal data with any third parties unless required to do so by law or with your explicit consent.

## **6. Data Retention**

- 6.1 We will retain your personal data for as long as necessary to fulfill the purposes outlined in this Privacy Notice, for as long as you wish to receive information from us or use our services, or until your request deletion of your data. Once this period has ended, upon your request to delete your data, if you withdraw your consent, or when there is no longer legal ground for us to process the data, we will securely delete your personal data from our systems.
- 6.2 Please note that we may need to keep information about you for longer than mentioned above, where we are required to do so by law, regulation or government decision (e.g. the Swedish Accounting Act requires accounting information to be stored for seven (7) years in addition to the current year), or where processing is necessary to establish, enforce or defend a legal claim.

## **7. Your Data Protection Rights**

- 7.1 Under the GDPR, you have the following rights regarding your personal data:
- Right of access – You have the right to request a copy of the personal data we hold about you.
  - Right to rectification – You have the right to request that we correct any inaccuracies in your personal data.
  - Right to erasure – You have the right to request that we delete your personal data.
  - Right to restrict processing – You have the right to request that we limit the processing of your personal data.
  - Right to data portability – You have the right to receive your personal data in a structured, commonly used, and machine-readable format.
  - Right to object – You have the right to object to the processing of your personal data in certain circumstances.

To exercise any of these rights, please contact us at [privacy@hemla.com](mailto:privacy@hemla.com).

## **8. Data Security**

- 8.1 We are committed to ensuring that your personal data is secure. We have implemented appropriate technical and organizational measures to protect your personal data against unauthorized access, loss, or misuse.

## **9. International Data Transfers**

- 9.1 Your personal data will be stored and processed within the European Economic Area (EEA). If, in the future, we need to transfer your data outside the EEA, we will ensure that adequate safeguards are in place to protect your data.

## **10. Changes to this Privacy Notice**

- 10.1 We may update this Privacy Notice from time to time. Any changes will be posted on our website and apps by publishing a new updated Privacy Notice. If such a change requires a notice or consent under applicable law, you will be notified of this or given the opportunity to issue your consent (if necessary).

## **11. Contact Information**

- 11.1 If you have any questions or concerns about how we process your personal data or if you wish to exercise your rights, please contact us at:

e-mail: [privacy@hemla.com](mailto:privacy@hemla.com)

- 11.2 If you believe that we are not processing your personal data in accordance with the law, you also have the right to lodge a complaint with a supervisory authority, such as the Data Protection Authority in your country.

**Sweden's Supervisory Authority:**  
Integritetsskyddsmyndigheten (IMY)  
[www.imy.se](http://www.imy.se)

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This Privacy Notice was last updated on 2024-10-03.