

PRIVACY POLICY

Please read this Privacy Policy carefully to understand how and for what purposes Quant processes your Personal Data.

1. INTRODUCTION

- 1.1. This Privacy Policy ("**Policy**") describes how Quant AB, Company Reg. No. 556975-5654, St. Göransgatan 66, 112 33 Stockholm, Sweden, and other entities' within the Quant group (collectively "**Quant**", "**Quant Group**", "**we**" or "**us**"), as controllers, processes your Personal Data. Personal Data is any and all information that can, directly or indirectly, be used to identify a natural person ("**Personal Data**").
- 1.2. Your integrity is of utmost importance to us and Quant only process your Personal Data in accordance with this Policy and applicable law, such as the GDPR (EU/2016/679). In this Policy you will also find information on your rights and how to get in contact with us.
- 1.3. This Policy applies to all our processing of Personal Data related to contact inquiries, performance of our services, agreement you may have entered into with us, job applications, cookies, marketing and your use of our website and smartphone apps. Depending on your relationship with us and what type of our services you use, are involved in or purchase from us, the purposes and means of the processing of your Personal Data, as well as the means of collection, may vary. We process Personal Data for the purposes outlined under Section 3 below.
- 1.4. Please note that you may not be able to fully utilise our services without disclosing some Personal Data to us.
- 1.5. If you disclose Personal Data to us about others, you are responsible for ensuring that these persons are informed about this Policy and any additional terms applicable to the specific processing in question.

2. WHO IS RESPONSIBLE FOR THE PROCESSING OF PERSONAL DATA?

- 2.1. Quant AB is the controller of most of the processing of your Personal Data. However, different entities within the Quant Group may be either controllers, processors or joint controllers, with regards to processing of Personal Data described herein, depending on how you get in contact with us (e.g. via our website or by purchasing one of our services).
- 2.2. Other companies (e.g. our partners) may also be joint controllers of the processing if such entities, together with a Quant Group entity, determines the purposes and means of the processing of your Personal Data.
- 2.3. Third parties such as Quant's sub-contractors, or even entities within the Quant Group, may process your Personal Data on behalf of an entity within the Quant Group as a processor (e.g. to manage or maintain our website).
- 2.4. We may also be required to transfer certain Personal Data to public authorities, in which case they will become controllers of the Personal Data transferred to them.

3. WHAT PERSONAL DATA IS COLLECTED AND HOW IS IT USED?

- 3.1. Quant may process your Personal Data for the purposes set out below, as well as purposes described to you in connection with the specific services you use:

- **The performance of our Services**

Purpose of the processing

Quant may collect Personal Data directly from you when you use our services (e.g. use our smartphone apps, products, or a specific service the company you work for has purchased from us (hereinafter collectively “**Services**”)).

In order to take on or complete a work order or perform our Services we need to process Personal Data. The scope of the Services provided to you or the company you work for will determine what Personal Data will be processed and how.

Regardless of the scope of the work, we always need a contact person for each customer in order to accept or complete the work (including invoicing). Therefore, if you are a contact person of our customer, we will process your contact details (name, title, e-mail address and telephone number). We will normally collect these data directly from you, but in some cases, we may receive them from someone else at your company.

Depending on the scope of the Services purchased we may also process Personal Data concerning persons who are connected to the work, such as employees of our customer, in order to complete the work on behalf of our customer (e.g. in conjunction with a work order or services request).

If we have a customer relationship with you, we may also contact you in regards of our cooperation.

The Personal Data that we process

- Representative/contact person at a customer
Name, title, and contact details (such as office address, e-mail address and telephone number). If necessary, in order to perform the work: other Personal Data such as identification number or a copy of an identity card or equivalent.
- Other data connected to the Services
Depending on the scope of the Services we may need to process information about contact persons at customer, counterparties, authorities, companies or other organisations in order to contact these organisations to perform the work on behalf of the customer. In most cases we only process name, title and contact details (such as office address, e-mail address and telephone number).

The personal data is normally collected from the person itself but can also be collected from another person involved in the work. In rare cases, we complement the Personal Data by collecting information from public registers, public authorities (such as the company register from the Swedish Companies Registration Office), credit rating institutions, banks or other sort of reporting bureaus.

Legal basis

We process Personal Data to the extent that it is necessary for the purpose of performing our Services in relation to our customers (including invoicing), which is in our and our customer’s legitimate interest. In regards to the aforementioned Personal Data, we believe that the data subjects’ interests or fundamental rights and freedoms do not override our and our customer’s legitimate interest. We continuously evaluate if the data we receive or collect constitute a violation of the data subjects’ interests or fundamental rights and freedoms.

Data retention

We process your Personal Data for the purposes of performing our Services only for as long as you or your employer are in a business relationship with us or use our Services. If you are not a customer, but for some other reason have been in contact with us, we will only process your Personal Data for as long as our business relationship exists.

- **Customer Reports**

Purpose of the processing

Provided that the company you work for has purchased customer reports from us we will, if you are authorised to access such reports, process your Personal Data for the purpose of giving you access to our report database and to verify your log in to our system.

The Personal Data that we process

Contact details, such as name, title, office address, e-mail address and telephone number.

Legal basis

We process Personal Data to the extent that it is necessary for the purpose of performing the contract with our customer of providing customer reports (including invoicing), which is in our and our customer's legitimate interest. In regards to the aforementioned Personal Data, we believe that the data subjects' interests or fundamental rights and freedoms do not override our and our customer's legitimate interest. We continuously evaluate if the data we receive or collect constitute a violation of the data subjects' interests or fundamental rights and freedoms.

Data retention

We process your Personal Data for the purposes of providing our customers with customer reports only for as long as your employer are in a business relationship with us and you are authorised to access the reports.

- **Contact inquires**

Purpose of the processing

If you contact one of our offices via e-mail, telephone or via one of our other communication channels, we may process the Personal Data you provide us with in order to help and assist you further. We process your Personal Data in order to respond to, assist, follow up and handle your customer service inquiry. This includes the communication necessary in order for us to respond to questions you have submitted to us. We may also process your Personal Data in order to handle complaints or support inquiries, including technical support.

The Personal Data that we process:

- Identity related data such as name
- Contact details such as e-mail address, telephone number, office addresses
- Technical data, e.g. about your IT equipment
- Receipt details, e.g. previous purchases
- Other Personal Data you provide as part of your inquiry

Legal basis

The processing is based on our legitimate interest of handling customer service inquiries. In regard to the aforementioned Personal Data, we believe that the data subjects' interests or fundamental rights and freedoms do not override our legitimate interest. We continuously evaluate if the data we receive or collect constitute a violation of the data subjects' interests or fundamental rights and freedoms.

Data retention

At least twice a year we will follow up any customer service inquiry and clean up if the matter has been closed. This to be able to administer and to follow up on your inquiry.

• **Recruitment**

Purpose of the processing

If you submit a job application (general or for a specific role) via our website or our other communication channels, we process your Personal Data in order to evaluate your application and recruit staff. This includes, if applicable, references and background checks if part of the recruitment process.

We kindly ask you not to send us any sensitive Personal Data (e.g. information revealing health conditions, race or ethnicity).

If you are offered and accept employment with us, some of the Personal Data we have collected during the recruitment process will form part of your employment contract.

Please note that we will share your Personal Data with our suppliers for recruitment services and personality tests.

The Personal Data that we process:

- Identity details (e.g. name).
- Contact details (e.g. e-mail address, telephone number, address).
- Recruitment details (e.g. CV, cover letter, previous and/or relevant work or other experience, transcripts, education, or other information you voluntarily provide to us in the job application).
- Information regarding the position and employment for which you have applied, area or preferable country or other job preferences.
- Gender, citizenship and nationality.
- Your qualifications, skills, and interests for Quants' career opportunities.
- Grades, certificates, education, references and background checks or other information that you provide as part of your job application.
- Reports and other Personal Data needed in order to comply with applicable laws, regulations, legal processes, or enforceable governmental requests.

Data retention

Your application will be retained during the entire recruitment process. If you are not offered employment with us, we will retain the Personal Data about you that we have collected for up to 24 months after the recruitment process is finished, in order to defend ourselves against legal claims from you (e.g. regarding discrimination).

Spontaneous job applications will, unless a recruitment process is initiated, be saved for up to 12 months from the date you send your application to us. Thereafter the Personal Data collected will be permanently deleted.

- **Direct marketing**

Purpose of the processing

If you use our Services we may process your Personal Data in order to send you information with regards to our products and services, as well as customer surveys that gives you the opportunity to influence the range of products and services we provide.

We process your Personal Data in our communication with you in order to market and sell our products and services, as well as for customer care purposes. The communication includes newsletters, invitations to customer activities or other information that we believe may be of interest to you in your job role.

Please note that we, depending on your relationship with us, can use different means to collect your Personal Data for direct marketing purposes, some of which include collection of Personal Data from third party suppliers such as LinkedIn. We for example use LinkedIn's service "Sales Navigator" which is connected to our CRM system and gives us the opportunity to transfer and collect Personal Data about contact persons at potential customers more efficiently.

The Personal Data that we process

We process your name, title, e-mail address and telephone number.

Legal basis

The processing of your Personal Data for marketing purposes is based on our legitimate interest. In regards to the aforementioned Personal Data, we believe that the data subjects' interests or fundamental rights and freedoms do not override our legitimate interest. We continuously evaluate if the data we receive or collect constitute a violation of the data subjects' interests or fundamental rights and freedoms.

Data retention

We process your Personal Data for marketing purposes only for as long as you or your employer are in a business relationship with us. If you are not a customer, but for some other reason have been in contact with us or if we consider you to be a potential customer, we will only process your Personal Data for marketing purposes for the later of (i) as long as our business relationship exists, or (ii) for as long as you are of interest to us as a potential customer and have not opposed to us contacting you.

If you wish to no longer receive marketing from us, you can object to further processing by contacting us (see contact details below). If you object to our continued processing, your Personal Data will be deleted or anonymised (unless the Personal Data in question is also processed for other purposes) and you will no longer receive direct marketing from us.

- **Evaluation of completed work**

Purpose of the processing

We are interested in understanding our customers' experience of the Services we provide to you. Therefore, we may ask you as a representative for our customer to evaluate our performance after completing an assignment/work. Participation is voluntary.

The Personal Data that we process

We process information regarding name, title, e-mail address and telephone number that we have collected in connection with the work. If you choose to participate, we also process your evaluation answers.

Legal basis

The processing is necessary for the purpose of sending a request for evaluation participation in order for us to improve our Services, which is our legitimate interest. In regard to the aforementioned Personal Data, we believe that the data subjects' interests or fundamental rights and freedoms do not override our legitimate interest. We continuously evaluate if the data we receive or collect constitute a violation of the data subjects' interests or fundamental rights and freedoms.

Data retention

We anonymise all answers on evaluations within two months of collection.

- **Personal Data collected automatically via cookies**

Purpose of the processing

We use cookies on our website to improve your experience when using our website, generate statistics to analyse users and to enhance the security.

Personal Data that we collect through cookies (e.g. your IP-address) may be anonymised and used in aggregated form as a basis for improvements, statistics and analysis (see Section "Statistics and analysis" below).

For further information about what cookies Quant uses, your rights and other information please read our [Cookie Policy](#).

The Personal Data that we process

Please see Quant's [Cookie Policy](#) for further information on the type of cookies used and what Personal Data we collect.

Legal basis

We process Personal Data via cookies on our website based on your consent.

Data retention

Please see Quant's [Cookie Policy](#) for further information on how long we process Personal Data collected via cookies and how long each cookie is saved on your device.

- **Statistics and analysis**

Purpose of the processing

Quant may anonymise the Personal Data collected from you in connection with your use of our Services (e.g. when you use our smartphone apps), to use in aggregated form as a basis for improvements, statistics and analysis.

The Personal Data that we process

The Personal Data we process may include user behaviour, IP-address and technical data (e.g. about your IT equipment).

Legal basis

The processing is necessary for the purpose of improving our Services, which is our legitimate interest. In regards to the aforementioned Personal Data, we believe that the data subjects' interests or fundamental rights and freedoms do not override our legitimate interest. We continuously evaluate if the data we receive or collect constitute a violation of the data subjects' interests or fundamental rights and freedoms.

Data retention

We anonymise all Personal Data collected for statistical and analytical purposes within 24 months of collection.

• **Third party transfers**

Your Personal Data may be processed by relevant authorities as well as entities within the Quant Group and by Quant's sub-contractors and partners. Personal Data will only be processed in accordance with this Policy, for purposes you have agreed to, or purposes that are otherwise legitimate or required under applicable law (e.g. to fulfil an agreement between you and us).

We may share your Personal Data with third parties. As detailed above, your Personal data may be transferred to Quant Group entities, partners and suppliers within and outside the EU/EEA. We never sell your Personal Data and Quant will always enter into necessary data processing agreements with the companies that process your Personal Data on our behalf or as a joint controller; all to ensure an adequate level of security.

We may share your Personal Data with the following recipients and for the following purposes:

Suppliers

We may, in order to fulfil the purposes with our processing of your Personal Data, use other companies to fulfil our obligations to you. To that end, we will share or transfer your Personal data with or to companies that provide services to Quant, including, but not limited to, our suppliers providing customer service, delivery services, analysing services, communication and marketing services. Quant may also share your Personal Data with our suppliers providing hosting, storage, technical support and maintenance of our IT solutions. Furthermore, we may transfer your Personal Data to our payment service providers who provide us with payment solution services, in order to facilitate your payment to us.

Our suppliers only process your Personal Data in accordance with our documented instructions and may not use your Personal Data for their own purposes. They are also required by law to protect your Personal Data from unauthorised access and similar.

Social media suppliers

We may, with your consent, transfer your Personal Data to third party marketing companies (e.g. Facebook, Google, Instagram) to show you relevant and personalised advertisements, measure the effectiveness of an advertising campaign or to record traffic flow and ad clicks. We analyse the information we collect about you, for instance by dividing customers into different customer categories based on purchase patterns, behaviour and interactions with us.

Other recipients

We may, as the case may be, transfer your Personal Data to other recipients than those outlined above if it is necessary in order for us to fulfil the purposes outlined below:

Repient	Purpose	Legal basis for transfer
Public authorities	We transfer Personal Data to public authorities if we are required to do so by law.	The processing is necessary for compliance with a legal obligation to which we are subject.
Debt collectors	If you do not pay we may transfer your Personal Data to a debt collector agency in order to collect your debt owed to us.	The processing is necessary for our legitimate interest of receiving payment for Services rendered. In regards to the aforementioned Personal Data, we believe that the data subjects' interests or fundamental rights and freedoms do not override our legitimate interest. We continuously evaluate if the data we receive, transfer or collect constitute a violation of the data subjects' interests or fundamental rights and freedoms.
Courts, appellant/appellee, etc.	If there is a trial or similar, we may transfer your Personal Data to the court, public authority or appellant/appellee as the case may be, in order to protect our interests.	The processing is necessary for our legitimate interest of being able to defend ourselves or protect our interests. In regards to the aforementioned Personal Data, we believe that the data subjects' interests or fundamental rights and freedoms do not override our legitimate interest. We continuously evaluate if the data we receive, transfer or collect constitute a violation of the data subjects' interests or fundamental rights and freedoms.

Re-organisation, merger or acquisition	If Quant re-organises its organisation or for other reasons sells parts or the entirety of its business to a third party, your Personal Data may be transferred together with the business.	The processing is necessary in order to fulfil our legitimate interest of selling business, merger or acquisition. In regards to the aforementioned Personal Data, we believe that the data subjects' interests or fundamental rights and freedoms do not override our legitimate interest. We continuously evaluate if the data we receive, transfer or collect constitute a violation of the data subjects' interests or fundamental rights and freedoms.
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- 3.2. For more information about when we delete your Personal Data, see Section 5 below.

4. WHERE IS THE PERSONAL DATA PROCESSED?

- 4.1. Quant will process your Personal Data both within and outside the EU/EEA.
- 4.2. Quant may transfer to, or process your Personal Data in, third party countries outside the EU/EEA in order for us to provide you Services. We will ensure that such companies have an adequate level of security with respect to the processing of Personal Data. Such companies outside the EU/EEA will be legally bound to apply to an adequate level of security with respect to the processing of your Personal Data, by means of Binding Corporate Rules or the EU Commission's Standard Contractual Clauses.

5. WHEN ARE PERSONAL DATA DELETED?

- 5.1. Quant will process your Personal Data for as long as it is necessary to fulfil the purposes of the processing. Thereafter we will delete your Personal Data or anonymise it so that it is no longer possible to use to identify you. Under Section 3 above the retention period is detailed for each processing purpose.
- 5.2. Please note that Quant has the right or may be obliged to undertake certain processing activities without your consent (e.g. due to legal requirements).
- 5.3. We may prolong the processing of your Personal Data under certain circumstances and on a case by case basis if we are required by law or relevant authorities, or if we have a legitimate interest to do so and is so allowed by applicable law (e.g. to defend our interest should we have a dispute with you).

6. YOUR RIGHTS

- 6.1. You may exercise your rights in connection with our processing of your Personal Data at any time.

- **Access to your Personal Data**

Unless otherwise required by law, you have the right to obtain a confirmation from us as to whether or not we process your Personal Data, as well as the right to access the Personal Data processed, together with information about the processing and your rights (a data subject access request).

- **Right to rectification**

You have the right to, at your request and without undue delay, obtain rectification or completion of your Personal Data that is inaccurate or incomplete.

- **Withdrawal of consent with future effect**

To the extent we are processing your Personal Data on the basis of your consent, you have the right to withdraw your consent to future processing at any time.

- **Erasure**

You have the right to request the erasure of your Personal Data, for example if the Personal Data is no longer necessary for the purposes for which they were collected or otherwise processed, or if the Personal Data has been processed unlawfully. However, this does not apply to the extent the processing is necessary for example to comply with a legal obligation or for the establishment, exercise or defense of a legal claim.

- **Restriction of processing**

You have the right to request that the processing of your personal data is restricted if (i) you consider the personal data to be incorrect, (ii) the processing is illegal and you do not want the personal data deleted, (iii) we no longer need the personal data for the purposes of processing, but you need the personal data to be able to establish, assert or defend a legal claim, or (iv) you have objected to the processing pursuant to the paragraph below and are awaiting our review of whether the objection is valid. Note in particular that this right does not apply to the extent that the processing is necessary to fulfill a legal obligation or to be able to establish, assert or defend legal claims.

- **Right to object to processing**

You have the right to object to processing that is based on our legitimate interests, as well as processing of your Personal Data for direct marketing purposes.

- **Right to complain**

If you are dissatisfied with our processing of your Personal Data or think that we process your Personal Data unlawfully, we welcome you to contact us with your complaint so that we can help you. If you do not want to turn to us or if you, despite turning to us, are not satisfied, you may file a complaint to a supervisory authority. The supervisory authority in Sweden is the Swedish Authority for Privacy Protection (Sw: Integritetsskyddsmyndigheten) (www.imy.se).

- **Exercise your rights**

To exercise your rights, please send an email to: integrity@quantservice.com

7. SECURITY

- 7.1. Quant strives to maintain a high level of protection of your Personal Data and privacy by taking appropriate technical and organisational measures to protect your Personal Data against unauthorised access, loss, alteration or other unauthorised processing. Quant continuously improves its security measures to meet the development of technology.
- 7.2. All our systems use modern technology to prevent unauthorised access and other unauthorised processing.

8. MISCELLANEOUS

- 8.1. Quant reserves the right to change this Policy at any time. If we make changes to this Policy, we will notify you. The means of notification varies depending on what Services you use and when. The new terms will however always be published on Quant's website.

9. CONTACT US

- 9.1. You are welcome to contact us if you have any questions or thoughts regarding this Policy, our processing of your Personal Data or if you would like to get in contact with us for other reasons at: integrity@quantservice.com.
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