

# MOBILE PRIVACY POLICY

Version 2018-05

The privacy of all of our Users is very important to us. When you, as an App-user, use the Service Lindesbergs kommun, Stentäppsgatan 5, 711 35 Lindesberg, kommun@lindesberg.se, (“we”, “us” or “our”), process your Personal Data. This Privacy Statement describes how we safeguard and process your Personal Data. We recommend you to read it carefully.

## 1. WHAT IS STATED IN THIS PRIVACY STATEMENT?

In this Privacy Policy we inform you about:

- The kinds of Personal Data processed;
- The purposes for which Personal Data is processed;
- For how long your Personal Data is stored;
- Where the Personal Data are processed;
- The security measures in place to protect Personal Data;
- Limits of responsibility concerning third parties;
- Viewing, changing and deleting your Personal Data;
- Changes to this Privacy Statement;
- What to do if you have any questions or remarks.

## 2. THE KINDS OF PERSONAL DATA PROCESSED

### A. Personal Data by using our Service

In order to improve the Service, we use anonymous Data. This information will not go public through the Service.

### B. Automatically generated information

Like most other websites and online services, we gather and process automatically generated information about how you use the App. The information gathered includes your IP-address and/or a unique device ID.

If you specifically opt-in, the App may collect your geo-location information. In any event, you can block geo-location collection through the settings of your mobile device.

If you specifically opt-in to permit access and collection of information from your social network account, then your basic personal information in your social network account will be collected (such as your name and email address) as well as your social network user id (but not your password) and parameters related to the posts you shared through the App. Please refer to the social network’s privacy policy for more details on how you can set the privacy preferences of your account to control the information that may be accessed and retrieved.

This also occurs with regard to the automatically generated information about how you use the App. This kind of information helps us to better understand how the App is used, and how we can improve the service to suit the need of you as an user.

If you enable the user authorization features inside the App, the following additional information will be stored:

- Name;
- Email address;

- IMEI number;
- Age range (optional);
- Gender (optional);
- Phone number (optional);
- Additional profile information returned by an external provider such as Facebook or LinkedIn.

We are also collecting the following (anonymous) information:

- The moment you open the app;
- The blocks you've opened inside the app and the amount of time you've spend in this block;
- Actions such as music playback, opening URLs etc.
- The moment you leave the app;

Note: if the user authorization features are enabled we are able to link the anonymous information to you once you login.

#### C. Specific information

We may ask you to engage in certain activities in the App, such as for example loyalty-card, newsletters, advertising, in which case you will be asked for certain personal information. This information will be stored in the databases of our service (included third parties) and will be shared with us.

When you upload Data, including photos in the App, this will be shared and can be viewed by all other users of the App.

### 3. THE PURPOSES FOR WHICH PERSONAL DATA IS PROCESSED ?

#### A. Purposes

We process Personal Data for the following purposes:

- to enable you to use the Service;
- to keep you updated with relevant information about our Service;
- to improve and/or customize the Service;
- to identify you/or customize the Service;
- to identify you and to prevent fraud;
- to provide support;
- to get information about the usage of the App;
- to pass your Personal Data to third parties, if you requested us to do so or if we are legally obliged to do so.

The processing of your personal data for the purposes listed above is conducted on the basis that it is necessary for the performance of our contract with you regarding the provision of the Service. The processing of your personal data is also conducted on the basis of that it is in our legitimate interest to be able to administer the Service, improve the Service, provide support and to get information about the usage of the App.

#### B. Transmission of Personal Data to third parties

We do not sell, trade or rent your Personal Data to third parties without your prior consent. However, we can provide your Personal Data to third parties, when this is essential for providing the Service to you or for carrying out your instructions, such as for making payments by means of payment providers for Paid Services. We will share your Personal Data with our IT service providers. In such cases, a data processing agreement will be entered into which ascertains that your Personal Data is processed only in accordance with this Privacy Policy.

We may provide “aggregated anonymous data” about the usage of the Service to third parties for such purposes as well, as it deems to be appropriate. “Aggregated anonymous data” is data that cannot be

traced back to you and which therefore does not count as Personal Data. Thus, we may use and share aggregated anonymous data to better understand how Users use the Service.

In the event that we are transferred to a third party, or that we merge with a third party, or undergo a reorganization, your Personal Data may, on basis of our legitimate interest of completing the transaction or transfer, also be disclosed and/or transferred to that third party. This third party will have the right to continue to use Personal Data and other information that you provided to us.

We may disclose your Personal Data where we believe, in good faith, that it is necessary to comply with a court order, ongoing judicial proceeding, criminal or civil subpoena, or other legal process or request by law enforcement authorities in Sweden or to exercise its legal rights or defend itself against legal claims. The legal basis is that we, in these cases, have a legal obligation to perform such transfer, or that it is in our legitimate interest for the purpose of excluding criminal acts from the App.

#### **4. STORAGE OF PERSONAL DATA**

We store your Personal Data as long as necessary for us to fulfil the purposes of the processing. This means that we will process your Personal Data as long as you are an active user with our Services. If your account is no longer active, your Personal Data will be kept for a maximum period of three months, however that Personal Data necessary for the purposes set out in section 3. A. above for a longer period of time may be kept for that period of time.

When your Personal Data is no longer necessary for the purposes of the processing, it will be deleted or anonymized. We will, however, store your Personal Data if and to the extent we are required to do so according to law.

#### **5. WHERE THE PERSONAL DATA IS PROCESSED**

The Service is provided by using hosting services in the European Economic Area. However, the Personal Data processed may be transferred to, and stored on, servers maintained by located in a country outside the European Economic Area (EEA), such as the United States of America, only in accordance with what is set out in section 3. B. above.

Those third parties state that it shall comply with the requirements on third country transfers, for example by being registered for the EU-U.S. Privacy Shield principles. This means that there should be an adequate level of protection for the processing of Personal Data by such third parties. We will take all steps reasonably necessary to ensure that your Personal Data is treated securely and in accordance with this privacy policy. Please contact us if you wish to receive a copy of the safeguards applied in regard to such third country transfers.

#### **6. WHAT SECURITY MEASURES ARE IN PLACE TO PROTECT PERSONAL DATA?**

The security of your data and that of other Users is very important to us. We have implemented technical and organizational measures to protect your Personal Data against loss or any form of unlawful processing. We implemented the following measures: protection of our servers by firewalls, SSL connections and encryption of sensitive data. This list is not exhaustive.

#### **7. LIMITS OF RESPONSIBILITY CONCERNING THIRD PARTIES**

Our Service may contain services and products offered by third parties, and/or hyperlinks to the websites or services of partners, advertisers and other third parties.

We have no control or influence over the content, websites or services of these third parties. Different privacy policies may apply to the use of third party websites and services. This Privacy Statement only relates to Personal Data which have been obtained by us through your use of the Service for its own purposes. We do not accept any responsibility or liability for the content, practices or operation of third party websites and services.

## 8. YOUR RIGHTS

You have the right to receive confirmation on whether or not we process Personal Data concerning you, and in such cases get access to such Personal Data and also information regarding the Personal Data and how we process it.

You have the right to have inaccurate Personal Data concerning you rectified without undue delay. Taking into account the purposes of the processing, you also have the right to have incomplete Personal Data about you completed.

You have, under certain circumstances, the right to have Personal Data concerning you erased, for example if the Personal Data are no longer necessary in relation to the purposes for which they were collected or if the Personal Data have been unlawfully processed.

In some circumstances you have the right to obtain restriction of the processing of your Personal Data. For example if you contest the accuracy of the Personal Data, you can also require that we restrict the processing of your Personal Data for such a period that enables us to verify the accuracy of the Personal Data.

You have the right to object to processing of your Personal Data that is based on our legitimate interests. If this is done, we must provide compelling legitimate grounds for the processing which overrides your interests, rights and freedoms, in order to proceed with the processing of your Personal Data.

You have the right to receive the Personal Data relating to you and that you have provided to us, in a commonly used electronic format. You have the right to transmit that data to another controller (data portability).

If you have any questions or concerns relating to our processing of your Personal Data, please do not hesitate to contact us. You also have the right to complain on the processing of your Personal Data by lodging a complaint to the Swedish Data Protection Authority.

## 9. CHILDREN'S PRIVACY

Personal information about children is not knowingly or intentionally collected.

## 10. SECURITY

Measures are implemented to secure your personal information, to minimize the risks of damage, loss of information and unauthorized access or use of information. However, these measures are unable to provide absolute information security. Therefore, although efforts are made to secure your personal information, it is not guaranteed by us or Appsales Sweden AB and you cannot reasonably expect, that the App and its related databases will be immune from any wrongdoings, malfunctions, unauthorized interceptions or access, or other kinds of abuse and misuse.

## 11. CHANGES TO THIS PRIVACY POLICY

This Policy may be updated at any time. We will publish any updated version of the Privacy Policy via the Service. We encourage you to check this page from time to time to be aware of any changes to this Privacy Statement and to stay informed about how we protect your Personal Data. You acknowledge and agree that it is your responsibility to review this Privacy Statement periodically and familiarize yourself with any updates.

You agree to be bound by any of the changes made to this Statement. Your continued use of the App after the changed take effect will indicate your acceptance of the amended Statement. If you do not agree with the amended Statement, you must uninstall the App and avoid any further use of it.

## 12. WHAT TO DO IF YOU HAVE ANY QUESTIONS OR REMARKS

If you have any questions or remarks about this Privacy Policy, please contact us by sending an email.

This Privacy Policy was last updated: 4 May 2018