

# Privacy policy - processing of personal data

## Purpose

We protect your privacy. You should be able to feel secure when you entrust us with your personal information. That is why we have established this policy. It is based on current data protection legislation and clarifies how we work to protect your rights and your privacy. The purpose of this policy is to let you know how we process your personal data, what we use it for, who can access it and under what conditions, and how you can exercise your rights.

## Background

We process your personal information primarily to fulfill our obligations to you and to provide you with as good a service as possible. Our starting point is not to process more personal information than is necessary for this purpose, and we always strive to use the least privacy-sensitive information.

We also need your personal information to provide you with good service, for example in terms of information provision, follow-up on support matters and marketing. We may also need your personal information to comply with laws and to perform customer and market analyzes. Participation in customer surveys is always completely voluntary and when using customer data for market analysis we use aggregated data and not individual data for the analysis.

When we collect personal information about you for the first time, ie when you create an account with us or access our website for the first time, you will have the opportunity to read through the general terms and conditions and the privacy policy and actively approve these. If you object to something and do not want to accept the terms and conditions or privacy policy, it means that you will not be able to use our services.

The Privacy Policy is part of our Terms and Conditions. By using the service you agree to our Terms and Conditions and this privacy policy. In doing so, you consent to our use of your personal data as below. By agreeing to this policy, you enter into a user agreement with PodMe AB, organization number 559113-6121.

By agreeing to these Terms, you also agree that we will provide you with information or contact you through email, push notifications or in-app notifications. However, you can choose to unsubscribe from emails at any time and choose not to allow push notifications in the app. We constantly strive to make it as easy as possible for you to choose to receive the type of marketing for our service that is relevant to you.

We reserve the right to remove your information and you as a user unless you comply with this policy, Swedish or other applicable law or act in a manner that we deem offensive or offensive.

## What personal information do we need from you?

We do not process personal data other than when required to fulfill obligations under contract and law and, from time to time, to provide you with information about our services. When you create an account with us, and possibly sign up for a premium subscription, we collect the following personal information from you.

- E-mail address
- Debit card numbers, credit card numbers and other bank related information. Your card details are needed for you to make a purchase but are never saved with us but are securely forwarded to the external payment service provider we use and who handles them in accordance with the card issuer's rules. Alternatively, you make your purchase using the payment method you select / select from the App Store or Google Play.
- Name. When you choose to register an account with Google or Facebook, we also have access to the name you have chosen to register with them but do not use that information for any purpose other than to search our database in case you have contacted our customer support and the is helpful so we can resolve your case. However, note that every time you create an account with PodMe with Google and / or Facebook, Google and Facebook receive information from you that you have registered an account.

## How do we access your personal information?

We regularly collect information that is created when you use our service. We do this to give you the best possible experience of our services. When registering with us via the web you need to enter your e-mail address and your card details if you want to buy a premium subscription to enable us to complete your purchases. We do not handle your card details in any way other than to make purchases possible. When you sign up through the app, we will then also have access to your email but no information related to the payment method you have chosen on Google Play or the App Store. You are always given the opportunity to give your consent before we start processing your personal data.

We also access your personal information in the following ways:

- Information recorded when you visit our website. We use analytics tools to better understand how our users use the service to improve the user experience
- Information that is recorded when you use the app, such as which tabs you visit and what you search for. This data is recorded so that we can better assist you in case you have any problems with the service. Otherwise, we only use this information at the aggregate level, that is, to better understand how the app is used.
- Information that is recorded when you are logged into your account. such as which podcasts you subscribe to, which episodes you listened to, and how long you listened to a section. It is necessary for us to give you a good user experience and to find the podcasts you subscribe to and listen from where you stopped playing during a previous use of the service.
- Information we receive when you sign up for newsletters and other mailings
- Information we receive when answering surveys and surveys
- Information we receive when you contact our customer service

The collection of data is used, among other things, so-called "Cookies". Cookies are used to help us understand how our website and app are used, for example through analytics tools such as Google Analytics. We also use a so-called Facebook pixel to analyze our marketing in social media. Finally, we use cookies for our back-end so that we can give you the best listening experience possible and can help you in the best way if you have a support case. It is only in

connection with support cases that one of our employees collects collected data about you and this is necessary for us to be able to resolve your support case.

You have the right to revoke your consent at any time. You do so by emailing [support@podme.com](mailto:support@podme.com) and requesting that we delete all personal information we have stored about you. We will then no longer process your personal data or obtain new ones, provided that it is not necessary to fulfill our obligations under contract or law. Keep in mind that revocation of consent may mean that we are unable to fulfill our obligations to you.

As soon as you request, we will delete all your information from our database. However, we may be required to save data for a certain amount of time, for example for accounting and archiving purposes.

You have the right to request register extracts free of charge stating what information we have registered about you. Requests in addition to what can be considered normal can be charged. You can request correction of any information that is incorrect, incomplete or misleading by contacting [support@podme.com](mailto:support@podme.com).

### **Is your personal data processed in a satisfactory manner?**

We work out procedures and procedures to ensure that your personal data is handled in a secure manner. The starting point is that only employees and other persons within the organization who need the personal data to perform their tasks should have access to them.

With regard to sensitive personal data, we have set up special access checks, which means a higher level of protection for your personal data.

Our security systems are developed with your integrity in focus and to a very high degree protect against intrusion, destruction and other changes that may pose a risk to your privacy.

We have several IT security policies to ensure that your personal information is processed securely.

We do not transfer personal data in cases other than those expressly stated in this policy.

### **When do we disclose your personal information?**

Our starting point is not to disclose your personal information to third parties unless you have consented to it or if it is not necessary to fulfill our obligations under contract or law. Examples of third parties who are entitled to process your personal data according to the assistance agreement are IT providers (eg Microsoft), payment services (eg Adyen) and app download services (Google Play, App Store). In cases where we disclose personal data to third parties, we establish confidentiality agreements and ensure that personal data is processed in a satisfactory manner.

## **Responsibility**

PodMe AB is responsible for personal data, which means that we are responsible for how your personal data is processed and that your rights are used.

This policy was updated 2019-10-16