

Integrity Policy & Personal Data Processing Practises at Position Green

1. Integrity Policy Scope

1.1 Below is described how Position Green AB, org. nr 559006-5834, ("Position Green", "us" or "we"), manage and process personal data in relation to you as a user of our Platform or a visitor of our website.

1.2 Position Green has developed and provides the Platform with the same name. The Platform aims to help organizations collect, manage, visualize, and report environmental and sustainability data. With the help of the Platform the organizations will achieve an easier, smarter, and more efficient way to manage their sustainability and environmental data reporting.

1.3 Privacy protection is a matter of a prioritization for us at Position Green. That is why it is important for us to protect your personal data and to make sure that the data is processed in a correct and legal manner.

1.4 In this Integrity Policy we describe what different types of personal data we might happen to process and for what purpose we process it. We also report our process practices of personal data as well as what options and what rights you have in relation to the processing. We kindly ask you to thoroughly read through this Integrity Policy and to make sure that you fully understand its content.

1.5 Kindly note that this Integrity Policy refers to processing of personal data of which Position Green is Personal Data Controller. This implies that we, at Position Green, are responsible for the processing of your personal data. This also implies that you should turn to us with any questions or concerns you might have, or if you wish to use any of the rights you have in relation to our processing of your personal data.

1.6 To be able to use the Platform you need to register personally. In the case you are invited to the Platform by e.g., one of Position Green's Licensees, Suppliers, or as a part of a Private Equity Company that reports through Position Green on behalf of a Licensee, it is your employer that is Personal Data Controller for the personal data processing that accompanies the registration, because of your employment, and therefore your employer is responsible for providing information to you as an employee, as well as to ensure purpose and legal basis for the processing. Position Green is, respectively, Controller for the Personal Data Processing with the purpose of providing the Platform with this information.

1.7 The purpose of the Platform is to collect, manage, visualize and report environmental and sustainability data. In case reported information contains personal data, for which Position Green is not responsible, the Licensee on whose behalf the data was reported is responsible (Controller) for the Personal Data and Position Green will take the role as Data Processor according to the Personal Data Processing Agreement included in the License Agreement and signed by the two parties.

In case you are using the Platform but are not connected to any of the Position Green Licensees, Position Green is Controller for the personal data processing. In a situation of such we will erase the personal data you have reported to the Platform unless we have specifically asked for that particular information.

2. Personal Data Processing

2.1 Personal Data refers to data that can be attributed to you. You are not obliged to disclose any personal data to us. If you decide to not disclose any personal data, this may result in you not being able to use the Platform to its full extent, or at all. If you, on the other hand, decide to allow us to take part of your personal data we might process personal data that can be attributed to you in accordance with the table below:

Category of registration	Type of Personal Data Purpose Legal basis
User of the Platform.	<p>Account information for your account in the Platform, including your name, phone number, your email address, title in the registered company, photo as well as possible personal settings.</p> <p>To administrate your account and ensure that the Platform is safe and reliable.</p> <p>Our legitimate interest in data processing.</p>
User of the Platform.	<p>Data about your activity in the Platform, e.g., that you as a user have registered data in the Platform.</p> <p>To ensure the quality of reported data and to be able to trace activity in the Platform.</p> <p>Our legitimate interest in data processing.</p>
Points of contact with the Licensee.	<p>Contact details such as name, email address, and phone number; as well as information about employer, organization, its address and your title.</p> <p>To administrate our customer relations and to use for marketing of our services.</p> <p>Our legitimate interest in data processing.</p>

Subscribers of our Newsletter.	Name, email address and phone number.	To use in marketing of our services.	Your consent.
Individuals booking a demo of our Platform.			
Job applicants.	Name, email address and phone number.	To use in marketing of our services.	Your consent.
Website visitors and users of the Platform.	Name, email address, phone number, CV, Cover letter, and other possible documents to confirm your qualifications.	To manage your job application.	Our legitimate interest in data processing.
	Data regarding website usage (cookies), such as IP-address, type of browser and what version, operating system, referring website address (the site you last visited before you entered our website), time of the server request as well as possible connection to your LinkedIn account.	To administrate your usage of our website and to provide website functionality. To be able to troubleshoot if a possible problem would occur with the website. To be able to provide relevant information and marketing.	Your consent.

3. Personal Data Storage

3.1 We will store your personal data for as long as it is necessary to achieve the purpose of the processing. In regard to you as a user of the Platform we store the data for as long as you are a registered user of the Platform and for maximum 15 months after

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you have been deregistered as a user, to be able to ensure the quality of reported data and trace activity in the Platform.

Information about you, as a subscriber of our newsletter, as an individual booking a demo of our Platform, or as a job applicant, will be stored until you withdraw your consent.

Regarding website related personal data this is stored while you are visiting our website and during 26 months after your latest website visit.

Insofar as your personal data is no longer necessary to achieve the purpose of the processing, or the processing for any reason is no longer allowed, the personal data will be anonymized or erased.

4. Recipient

- 4.1** We may disclose your personal data to our Personal Data Processors, e.g., companies working with IT- and cloud services. In this case Personal Data Processor Agreements will be set up to ensure that your personal data is being processed in accordance with this Integrity Policy.

5. Transfer of data

- 5.1** We store and process your personal data within the EU/EES. For the case in which our partners are conducting business in a country outside of the EU/EES, we ensure that appropriate safety measures are taken at the transfer of data.

6. Your rights

- 6.1** You have the right to receive confirmation that we are processing personal data attributed to you, and in that case get access to this personal data as well as information around the personal data and our processing of it.

You have the right to get incorrect personal data attributed to you corrected by us without undue delay. You also have the right to, with the purpose taken into account, in certain cases, to complement incomplete personal data.

You have the right to, during certain circumstances, to get your personal data erased by us, e.g. if the personal data is no longer necessary to achieve the purposes for which they were collected, or if the personal data has been processed in an illegal manner.

You have the right to demand that we limit the processing of your personal data in certain cases. If you, e.g., dispute the correctness of the personal data you can demand that we limit the processing of the data during the time it takes us to control that the data is correct.

You have the right to make objections against the processing of your personal data occurring on the basis of Position Green's legitimate interest. If so, we must demonstrate an imperative reason that weighs heavier than your interests, rights and liberties to be allowed to continue the processing.

You have the right to object to the processing of your personal data insofar as the processing is occurring for direct marketing purposes. In the event of such an objection we will no longer process your personal data for that purpose.

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You have the right to, under certain circumstances, retrieve the personal data you have provided to us, and which can be attributed to you in a digital format that is widely used. You have the right to transfer such data to another Personal Data Controller (data portability).

You have the right to at any given time recall your consent. Your recall will not affect the legality of the processing that occurred with support of the consent before it was recalled.

You have the right to make a complaint regarding the processing of your personal

data by handing in a complaint to the Data Inspection Services.

7. Amendments and Changes

7.1 We may make amendments or changes to this Integrity Policy. If we do so we will publish the updated policy on our website. If this happens we kindly ask you to thoroughly read through the updated Integrity Policy.

8. Contact Us

8.1 To update, correct or erase the personal data we have that can be attributed to you, or to use any of the rights you have regarding the above, you are welcome to contact us at privacy@positiongreen.com

*This Integrity Policy is effective from the 20th of October, 2020.