

PRIVACY POLICY

Celsicom AB (reg. no. 556891-4336), Galeasvägen 15, 302 72 Halmstad, Sweden, support@celsicom.se and www.celsicom.se ("Celsicom" or "We") care about your privacy and want you to feel safe when you provide your personal data ("Personal Data") to us in connection with contacting us, purchasing or using our cloud services ("Service") or when you allow the use of the cookies ("Cookies") that Celsicom uses on our cloud services websites www.celsicom.se and www.celsiview.se ("Website").

Celsicom is transparent about how we process your Personal Data and we want to communicate this to you in a simple and accurate way. Therefore, we ask you to read the text below about why and how we collect, store, process and, in some cases, share your Personal Data and what Cookies are, what type of Cookies we use, how you can accept or ignore the use of Cookies, how long Cookies are stored, but also what your rights are in our use of your Personal Data and Cookies ("Privacy Policy").

1. PERSONAL DATA

1.1 Responsible for your personal data - Data controller

Celsicom AB (org. no. 556891-4336), Galeasvägen 15, 302 72 Halmstad, Sweden, support@celsicom.se and www.celsicom.se is the data controller for the processing of your Personal Data ("Data Controller").

1.2 What is Personal Data and Personal Data Processing

Personal Data is any information that can be directly or indirectly linked to a living natural person, such as name, social security number, postal address, e-mail address, mobile or telephone number, IP address, etc.

Personal Data Processing is any operation performed on Personal Data, whether or not by manual or automated means, such as collection, recording, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, destruction, etc.

1.3 Personal data we collect or receive

We collect or receive the following Personal Data when We communicate with you, when you purchase a Service, visit the Website or when We enter into a contract,

- name, social security number, postal address, email address, telephone or mobile number, IP address, payment information and other information we receive through, for example, cookies you authorise our [Site](http://the Website) to use or other information you provide to us; [and](#)
- via official registers or authorities in order to ensure that the information we hold about you is accurate and up to date and that our correspondence is addressed to the correct recipient.

1.4 Why we collect or receive Personal Data

We need to process your Personal Data in order for our business to function in the best possible way for you as a customer or visitor to the Website. By law, we may only collect Personal Data for specific, explicitly stated and legitimate purposes. We may then only process the Personal Data in a manner that is compatible with the aforementioned purpose and that is supported by law. Therefore, in order for us to process your Personal Data, one of the following legal bases must be met;

- The processing is necessary for *the performance of our contract* with you;
- The processing is necessary because we have a *legal obligation* to do something under a law;
- Processing is necessary for our *legitimate interests* and your interests in the protection of your personal data are not overriding; or
- Processing is in accordance with the *consent* you have given.

When you provide Personal Data to us, or when we collect such information, we will only use it for the following purposes and legal basis.

- **To fulfil contracts;** with legal basis fulfilment of contracts, we use Personal Data to the extent necessary for us to identify you as our contracting party, customer, fulfil our contractual obligations, fulfil the purchase of Service, invoicing and handle customer matters (e.g. questions, complaints);
- **To manage and administer customer service matters;** with legal basis legitimate interests, we use Personal Data that is necessary for us to be able to administer and assist you with your case, query or complaint to us. If your query relates to a complaint, we will process Personal Data in order to fulfil our obligations under applicable law and we will then process Personal Data on the basis of legal grounds based on the contract with you;

- **To carry out updates and improvements to the Service and technology;** with legal basis legitimate interests, we use Personal Data to enable us to carry out updates to the Service and technology that enable your visit or to access information via [the Website](#) but also to understand your user experience to improve and develop services and technology;
- **To prevent misuse or unauthorised use of our Service and technology;** with legal basis legitimate interests, we use Personal Data to provide secure Services and technology that prevent attempts at unauthorised access or unlawful use of our Services or technology;
- **To be able to register the request of a person, who is not a registered customer or user of our Website, not to receive marketing from us;** with legal basis legitimate interest, we use Personal Data to prevent and correct that a person, who is not a registered customer of ours or user of the [Website](#), receives marketing mailings from us; and
- **To fulfil legal obligations;** with legal basis fulfilment of legal obligation We use Personal Data to fulfil our obligations under law, court order or authority;

1.5 Transfer, sharing or disclosure of Personal Data

We will only transfer, share or disclose your Personal Data in the manner set out in this Privacy Policy or as otherwise permitted or required by law.

We only transfer, share or disclose Personal Data securely within the organisation to fulfil our obligations to you. We also use external data processors, who on our behalf and according to our written instructions, handle certain data and processes, e.g. IT, legal, auditing, accounting, marketing, subcontractors, partners, etc. ("Data Processors"). In such case, the Data Processor has entered into a Data Processing Agreement with us that ensures that the Personal Data is secure and that there are security measures in place to protect it. If we share or transfer Personal Data in the aforementioned manner, it will only be used for the same purposes for which we originally collected it.

We may also disclose Personal Data to the police or other authorities if it concerns the investigation of a criminal offence or if we are otherwise obliged to disclose such information on the basis of a judgment, decision by an authority or law.

We do not usually share and transfer Personal Data to a recipient in a country outside the EU/EEA. If necessary or required by law, such transfers will only be made in accordance with specific safeguards, requirements and agreements required by law, such as entering into agreements that include standardised model data transfer clauses adopted by the European Commission, which are available via the European Commission's website.

1.6 Storage and retention period of Personal Data

We process Personal Data in order to provide you with the best possible Service, service and information. We only retain Personal Data that is necessary and only for as long as is necessary to fulfil the purposes for which the Personal Data was originally collected or as otherwise required by law. We have procedures in place to ensure that Personal Data is not stored unnecessarily and that storage time is minimised, as follows

- **Customer data;** Personal data and other relevant information will be deleted or de-identified at the latest ten (10) years after the fulfilment of all obligations under the contract or the termination of the contract;
- **Customer service cases;** Personal data and other information related to a customer service case will be deleted or de-identified no later than seven (7) years after the case is closed,
- **Personal Data collected with consent;** if you are not a registered customer or visitor of [the Website](#), We will ask for your consent to process your Personal Data before recording or processing it. In such case, Personal Data will be retained for as long as it is relevant and deleted no later than five (5) years after it was collected with consent. You may withdraw your consent at any time, in which case We shall delete your Personal Data without undue delay following your withdrawal.

A longer retention period than the one indicated above may occur if required by applicable law.

1.7 Security measures for Personal Data

We care about a high level of security for your Personal Data, which is why we continuously ensure that Personal Data is processed according to specific and relevant technical and organisational security measures, which securely protect your Personal Data from unauthorised access, modification, dissemination or destruction. We only process the information that is necessary and it is only processed by people who need to process it in order to perform their duties and fulfil the agreement we have entered into with you or otherwise by law.

1.8 Your rights

We would like to inform you of your rights when we process your Personal Data, as follows

- **The right to information;** your right to receive information about how we handle Personal Data when you provide or we collect your Personal Data can be found in the Privacy Policy or when you contact us.
- **The right of access (so-called "record extract");** your right to access information about and what Personal Data we process about you and the right to obtain a record extract of such information, subject to compliance with applicable law and the contract we have entered into with you. Your request for the aforementioned information must be in writing, signed by you personally and sent to Us by post or by email. If We receive such a request from you, We may request additional information from you to ensure that you are the correct requester and recipient of the Personal Data;
- **The right to rectification and completion;** your right to obtain the rectification of inaccurate or completion of incomplete Personal Data that we hold about you, provided that it is consistent with applicable law and the contract we have entered into with you.
- **The right to erasure;** your right to have your Personal Data erased to the extent consistent with applicable law. This right is limited to data that by law may only be processed with your consent, if you withdraw your consent and object to the processing;
- **The right to restriction or objection including automated decisions;** your right to restrict or object to our processing of your Personal Data, if it is based on legitimate interests or direct marketing, to the extent that it is in accordance with applicable law and the contract we have entered into with you. Your Personal Data will not be processed for automated decision-making or for direct marketing or profiling purposes if you object to such processing. You also have the right to withdraw your consent and to object to any marketing;
- **The right to portability;** your right to have Personal Data that you have provided to us transferred directly to you or to another data controller that you designate, provided that it is in accordance with applicable law and the contract we have entered into with you; and
- **Right to complain;** your right to lodge a complaint with the supervisory authority, the Privacy Protection Authority via the contact details provided in section 1.9 below, if you are not satisfied with our processing of your Personal Data.

If you have any questions or wish to exercise any of the above rights, please contact us using the contact details set out in point 5 below. We will then reply to your request as soon as possible, and at the latest within one (1) month. The deadline may be extended to two (2) months if your request is complex or involves several requests at the same time.

We will provide you with the above information free of charge. Only if your request is manifestly unfounded or excessive may we legally charge a reasonable fee to cover our administrative costs of providing the information or taking the action you request.

1.9 Contact the data protection supervisory authority

If you want to know more about the protection of Personal Data, ask questions or if you want to complain about our information about or handling of Personal Data, you can contact the supervisory authority, Integritetsskyddsmyndigheten, in one of the following ways, IMY, Box 8114, 104 20 Stockholm, imy@imy.se, 08-6576100 or www.imy.se.

2. COOKIES

2.1 The Celsicom website uses cookies

We use cookies on [the Website](#) to, among other things, offer you easily accessible information about us and our services with the best user experience when you visit [the Website](#) and otherwise as described below.

2.2 What a Cookie is

A cookie is a small text file that the Website stores on your computer or mobile device. The cookie can be used to save a certain type of information about [the Website](#) or you as a visitor, but also to allow you as a visitor to use various functions on [the Website](#). If you accept the use of Cookies when you visit [the Website](#), the server will send Cookies to your browser. Your browser stores Cookies with unique numbers on your device. When you visit [the Website](#) again, your browser will send the Cookies back to the server. The server reads the information in the Cookies and can thus personalise the content or remember your preferences for [the Website](#).

2.3 Cookies used on the Website and why

We use Cookies on [the Website](#) for the proper functioning of basic features, but also to optimise your browsing experience, to inform performance improvements and various analyses of [Website](#) usage. We use the following Cookies on [the Website](#)

- **Necessary;** contains information that We need to have to enable the activation of basic features of the [Website](#) (e.g. login details, contact form, etc.), in order for them to work

correctly during your visit to [the Website](#) but also to help us detect and track fraud or other attempts to gain unauthorised access to information about our services;

- **Functional;** enables the function of remembering the visitor's device and settings as well as choices made during previous visits to [the Website](#), in order to facilitate the visitor's navigation on [the Website](#);
- **Statistics, analysis and performance;** enables the function of anonymously measuring the number of visitors and anonymously tracking their use of [the Website](#) exclusively for anonymous statistical purposes, in order to simplify and improve [the Website](#) and its features for the visitor;

2.4 Storage and retention period for Cookies

We use both permanent and session cookies on [the Website](#). Session Cookies are temporarily stored on your device during your visit to [the Website](#) but are automatically deleted when you close your browser. Permanent Cookies are stored as a file on your device for a certain period of time, until you as a visitor or the server that has used them, delete them. A complete list of the cookies used, their functions, storage time, etc. is available on [the Website](#).

2.5 Sharing and transfer of Cookies

We will only share Cookies in the manner set out in this Privacy Policy or as otherwise permitted by law.

We share Cookies securely within the organisation to fulfil our commitments to you. We also use data processors, who on our behalf and according to our instructions, handle certain data and processes for us such as IT, legal, marketing, subcontractors, partners, etc. In such cases, the Data Processor has entered into a Data Processing Agreement with us that ensures that the Cookies are secure and that there are security measures in place to protect them. If we share or transfer a Cookie in the aforementioned manner, they will only be used for the same purpose for which we originally collected them.

We do not usually share and transfer Cookies to a recipient in a country outside the EU/EEA. If necessary or required by law, such transfers will only be made under specific safeguards and agreements as required by law.

2.6 Settings for Cookies

When you visit [the Website](#) for the first time, a pop-up window will appear with a brief explanation of what Cookies are and an option to choose to disallow or allow [the Website's](#) Cookies or to allow only certain Cookies. If you choose to allow our use of Cookies, you consent to our use of the Cookies and extensions that you actively selected in the pop-up, which are described in more detail in this Privacy Policy. If you choose to restrict or disallow the use of Cookies, some features [of the Site](#) will not function as expected. You can then change your choices or withdraw your consent at any time via [the Website](#). You can also choose how Cookies may or may not be used or whether to delete Cookies already on your device by following the instructions available under the Help tab in your browser menu.

2.7 Contact the supervisory authority for Cookies

If you want to know more about the protection of Cookies, ask questions or if you want to complain about our information about or handling of Cookies, you can contact the supervisory authority, the Swedish Post and Telecom Authority, in one of the following ways: Post- och telestyrelsen (PTS), Box 6101, 102 32 Stockholm, pts@pts.se, 08-6785500 or www.pts.se.

3. LINKS TO OTHER WEBSITES

This Privacy Policy applies only to Celsicom and [the Website](#). [The Site](#) may contain links to other websites with their own privacy documents and information, which we encourage you to review before clicking through. We are not responsible for information provided by anyone other than Celsicom or the content of any website other than ours.

4. UPDATE OF THE PRIVACY POLICY

We are continuously working on privacy issues and therefore update the Privacy Policy when necessary. The latest version of the Privacy Policy is available on [the Website](#) or can be requested via the contact details below.

5. CONTACT US - DATA CONTROLLER

If you would like more information or have questions or comments about our Privacy Policy, Personal Data or Cookies, or if you are not satisfied with how we handle them or wish to exercise any of your rights, you are welcome to contact us, Celsicom AB (reg. no. 556891-4336), in one of the following ways: Galeasvägen 15, 302 72 Halmstad, Sweden, support@celsicom.se or via the contact form on [the Website](#).

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