

## PRIVACY POLICY

Halon Security AB ("Halon", "we", "our" and "us") cares about your privacy. In our Privacy Policy, we inform you about how we process your personal data and what rights you have in relation to our processing of your personal data.

If you have any questions regarding our processing of your personal data or if you wish to assert any of your rights, you are welcome to contact us. Our contact information can be found [here](#).

### **In short: How we process your personal data**

- [If your company uses our services](#), we process your personal data to enable your company to use our service and provide support.
- [If you represent a potential customer, supplier or partner](#), we process your personal data to market our services towards the company you represent.
- [If you represent a customer, supplier or partner](#), we process your personal data to enter into agreements and administrate our relationship. If you represent a customer, we as well process your personal data to send you relevant marketing.
- [If you or your company have questions and queries](#), we process your personal data to handle such matter and defend ourselves against complaints.
- [If you visit our website](#) and have given your consent, we process your personal data to:
  - analyze how you use our website in order to improve and develop our website and our services by the use of analytics tools from Google and Hubspot; and
  - show you relevant marketing by the use of marketing services from LinkedIn and [HubSpot](#).
- [If you request a demo or download content from us](#), we process your personal data to provide the demo and content as well as other marketing material and to analyze how our newsletters are used.
- [If you attend our events](#), we process your personal data to:
  - administrate your registration and participation; and
  - publish photos/videos on our website and social media channels.
- [If you interact with us without having a business relationship](#), e.g. through our social media channels, we process your personal data to communicate with you and answer your questions.

### **Your rights, in short:**

- |  |   |
|--|---|
| ✓ <a href="#">The right to lodge a complaint with a supervisory authority,</a> | ✓ <a href="#">The right to erasure,</a>                       |
| ✓ <a href="#">The right to withdraw your consent,</a>                          | ✓ <a href="#">The right to rectification,</a>                 |
| ✓ <a href="#">The right to access,</a>   | ✓ <a href="#">The right to restriction of processing,</a> and |
| ✓ <a href="#">The right to object,</a>   | ✓ <a href="#">The right to data portability.</a>              |

In some cases your personal data can be transferred outside the EU/EEA by our partners and suppliers, which may entail that you have a more limited protection for your personal data once it has been transferred outside the EU/EEA. We describe this in more detail in our full Privacy Policy, which you can find [here](#).

*You can access a more detailed description regarding the specific processing of your personal data and your rights by clicking on the links above. Depending on the relationship we have with you, we process your personal data for all or only some of the above stated purposes.*

## PRIVACY POLICY – DETAILED VERSION

We at Halon care about your privacy and want you to feel safe when we process your personal data. In this Privacy Policy we want to provide information about how we process personal data. Depending on your relation to us and why you are in contact with us, we describe this in different sections. Click on the headings below that pertains to your purpose and you will be moved to the relevant paragraph.

- [Use our services](#)
- [Represent a potential customer, supplier or partner](#)
- [Represent a customer, supplier or partner](#)
- [Questions and queries](#)
- [Visit our website](#)
- [Requested a demo or downloaded content](#)
- [Attend to our events](#)
- [Interact with us without having a business relationship, e.g. through our social media channels](#)

*When we refer to “your company” in this Privacy Policy, we refer to your employer or the organization or public body that you represent. We will only process personal data about you in your business role, except in situations when you apply for a job at Halon. In such cases we describe how we process your personal data in our privacy policy in relation to recruitment.*

In this Privacy Policy we also describe your [rights](#) in relation to our processing of your personal data, to whom and why we share your personal data including where it is being processed.

*If you have any questions regarding our processing of your personal data or if you wish to exercise any of your rights, you are welcome to contact us at our [contact details](#) set out below in this Privacy Policy.*

### Halon is responsible for processing of your personal data

Halon Security AB, 556805-9447, Lilla Bommen 3, 411 04 Göteborg is responsible for the processing of your personal data.

Should you have any questions regarding our processing of your personal data, or if you wish to exercise any of your rights under data protection legislation, please contact us via our e-mail address [info@halon.io](mailto:info@halon.io) or phone +46 31 301 1920.

In some cases, your personal data can be processed within our services. It is however the company you represent that is responsible (controller) for processing of such personal data.

## Your rights

[Below you find a detailed description of your rights and how to exercise them.](#) In summary you have the following rights:

- the [right to lodge a complaint](#) with a supervisory authority,
- the [right to withdraw your consent](#),
- the [right to access](#) what personal data we process about you,
- the [right to rectification](#) of any personal data that is inaccurate,
- the [right to erasure](#) of the personal data we process,
- the [right to restrict](#) our processing,
- the [right to data portability](#), and
- the [right to object](#) to our processing of your personal data.

## Below you can read more about:

By pressing the selected heading, you will be moved to relevant paragraph

- Who can gain access to your personal data and why?
- Where is your personal data processed?
- What are your rights when we process your personal data?
- Balancing of interests' assessments when processing personal data based on the legal basis "legitimate interests"
- Detailed description of how we are processing your personal data

## Who can gain access to your personal data and why?

Your personal data is initially collected and processed by us and we do not sell your personal data. This means that your personal data will be handled by our employees, but only by the personnel in need of such access to conduct their work.

To conduct our business, we need to work with partners such as IT-suppliers which therefore will process your personal data. We are responsible for any sharing of your personal data to such partners and to ensure that your personal data is safe when shared with third parties, as set out below. We will share your personal data with the following recipients:

- We will share your personal data with our **IT partners** who will process these on our behalf and following our instructions to ensure good and secure IT operations. We

only share your personal data with our IT partners if it is necessary for them to fulfil their obligations towards us according to our agreement with them.

- Since the companies within the Halon group of companies work together and use the same IT-systems, we will share your personal data within the company group. This means that your personal data is processed both by the Swedish company Halon Security AB and the American subsidiary Halon Security Inc. This is the case for all the processing of personal data described in this Privacy Policy.
- We will share your data with [HubSpot](#), the **provider of our CRM-system**, in order to store information about our customers.
- When you use our website and consent to us doing so, we will also share your personal data with:
  - [Google](#) and [HubSpot](#), which provides the **service to analyze the website**, and
  - the companies which provide the **marketing services** we use, i.e. [LinkedIn](#), [Google](#) and [HubSpot](#).
- If you receive our newsletters or surveys, we will share your personal data with the company which helps us **send newsletters and surveys**, i.e. [HubSpot](#).
- If you interact with us on or visit our **social media** channels, such as [LinkedIn](#), [Facebook](#) (Meta), [Instagram](#) and [Twitter](#), the social media platform that you use will process personal data about you as a user.
- If you communicate with us by e-mail, we will share your personal data with our e-mail provider [Google](#) (Gmail).
- If you have a support matter we will share your personal data from your support matter with our IT-partner for support, Zendesk.
- If you participate in any of our events, we will share your personal data with:
  - the **photographer** that takes your picture and creates video content,
  - **social media channels**, such as LinkedIn, Facebook (Meta), Instagram and Twitter, if we publish a picture or video in which you appear. These social media channels either process your personal data on our instructions or as **controllers** in their own right for their processing of your personal data. What role they have in a particular case depends on the specific platform and activity, and
  - our **partner**, if the event is arranged by us in collaboration with the partner.

If you have any questions regarding how we share your personal data or want to know more about who we share your personal data with, please feel free to [contact us](#).

## Where is your personal data processed?

Your personal data will in most cases be processed outside of the EU/EEA if the suppliers we use are based outside of the EU/EEA. Your personal data will be transferred outside the EU/EEA in the following cases:

- Halon has staff outside the EU/EEA, namely in the USA and UK. Since we at Halon work together and use the same IT-systems, as well our American subsidiary Halon Security Inc. and the UK staff will get access to personal data about you, even if you are only in contact with the Swedish company Halon Security AB. This is the case for all the processing of personal data described in this policy.
- To our IT-suppliers that are based outside of the EU/EEA. For example, if you communicate with us by mail or have a support matter your personal data will be transferred outside the EU/EEA since Google (Gmail) and Zendesk (support) are located there. However, we have tried to protect your personal data and reduce the risk of it being transferred outside the EU/EEA by as far as possible only storing your personal data on the IT-supplier's servers within the EU/EEA. Regarding support matters, we have taken measures to ensure that support data from our EU customers are only accessible by support personnel located within the EU/EEA.
- If you use our website and have consented to us using [LinkedIn](#), [Google](#), [HubSpot](#) and other marketing tools your personal data may be transferred to the United States since these companies are based there.
- If you receive newsletters or surveys, transfer can be made to the United States when we use [HubSpot](#) since these companies are based there.
- If you visit and communicate with us on our social media channels (e.g. LinkedIn, Facebook (Meta) and Twitter), your personal data will be transferred outside the EU/EEA. One reason being that many of these companies are based in the United States.

When your personal data is transferred to the UK, we and our suppliers rely on an adequacy decision regarding the UK recognized by the European Commission for the transfer of personal data outside of the EU/EEA. An adequacy decision means that the European Commission has assessed that a particular country has an adequate level of protection for your personal data under Article 45 GDPR. You can find the adequacy decision for the UK [here](#).

We also rely on an adequacy decision regarding most transfers to the US, when our American suppliers are certified under the *EU-US Data Privacy Framework*. You can find the adequacy decision for the US [here](#). [Google](#), [Meta](#), [HubSpot](#) and [Zendesk](#) are certified under the EU-US Data Privacy Framework. By clicking on their names, you will be taken to the certificate of the respective company.

In the absence of an adequacy decision, or when our transfer is not protected under an adequacy decision, we and our suppliers will instead rely on Standard Contractual Clauses (Article 46.2 c GDPR) module 1 and module 2, and supplementary security measures for the transfer of personal data outside of the EU/EEA. We will rely on the Standard Contractual

Clauses when your personal data is shared with for example LinkedIn and Twitter. The use of Standard Contractual Clauses is an effort to provide a safe transfer of your personal data. You can find the Standard Contractual Clauses [here](#).

If you want to know more about where your personal data will be processed, please feel free to [contact us](#).

## **What are your rights when we process your personal data?**

You have certain rights that you can exercise to affect how we process your personal data. You can read a more detailed description about what those rights are below.

*If you want to know more about your rights or if you want to exercise any of your rights, please [contact us](#) and we will help you.*

### **Right to lodge a complaint with a supervisory authority (Article 77 GDPR)**

You have the right to lodge a complaint with a supervisory authority.

The supervisory authority in Sweden is the [Swedish Authority for Privacy Protection](#) (Integritetsskyddsmyndigheten, the IMY).

**In detail:** Your right to complain exists without prejudice to any other administrative or judicial remedy. You have the right to lodge a complaint with a supervisory authority in the EU/EEA member state of your habitual residence, place of work or place of where the alleged infringement of applicable data protection laws has allegedly occurred.

The supervisory authority has an obligation of informing you on the progress and the outcome of the complaint, including the possibility of a judicial remedy.

### **Right to withdraw consent (Article 7.3 GDPR)**

You have the right to withdraw your consent at any time by [contacting us](#).

**In detail.** The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

### **Right to access (Article 15 GDPR)**

You have the right to obtain confirmation as to whether we are processing personal data concerning you or not. You can make such a request by [contacting us](#). If we do process your personal data, you also have a right to obtain a copy of the personal data processed by us as well as information about our processing of your personal data.

**In detail.** The information we provide includes the following:

- the purposes of the processing,
- the categories of personal data concerned,
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations,
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period,
- the existence of the right to request rectification or erasure of personal data or restriction of processing of personal data concerning you or to object to such processing,
- the right to lodge a complaint with a supervisory authority,

- if the personal data are not collected from you, we provide you with available information about the source of the personal data;
- the existence of automated decision-making, including profiling, referred to in Articles 22.1 and 22.4 GDPR and, in those cases, meaningful information about the logic involved, as well as the significance and the predicted consequences of such processing; and
- where your personal data are transferred to a third country or to an international organization, you have the right to information regarding the appropriate safeguards, pursuant to Article 46 GDPR, put in place for the transfer.

For any further copies of the personal data undergoing processing requested by you, we may charge a reasonable fee based on administrative costs. If you have made the request by electronic means the information will be provided to you in a commonly used electronic form, unless otherwise requested by you.

Your right to obtain a copy referred to above shall not adversely affect the rights and freedoms of others.

### **Right to rectification (Article 16 GDPR)**

You have a right to obtain, without undue delay, the rectification of inaccurate personal data concerning you. You can make such a request by [contacting us](#).

**In detail:** Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

We will communicate any rectification of personal data to each recipient to whom the personal data have been provided to, unless this proves impossible or involves disproportionate effort. If you want information about those recipients, you are more than welcome to [contact us](#).

### **Right to erasure (“the right to be forgotten”) (Article 17 GDPR)**

You can at any time ask us to delete some or all of your personal data. You can make such a request by [contacting us](#).

**In detail:** We have the obligation to erase your personal data without undue delay where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you withdraw your consent on which the processing is based, and there is no other legal ground for the processing;
- you object to the processing pursuant to Article 21.1 GDPR and there are no overriding legitimate grounds for the processing, or you object to the processing pursuant to Article 21.2 GDPR;
- the personal data have been unlawfully processed; or
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law that applies to us.

Where we have made the personal data public and are obliged in accordance with the rights stated above to erase the personal data, we shall, taking account of available technology and the cost of implementation, take reasonable steps, including technical measures, to inform other controllers which are processing the personal data that you have requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

We will notify any erasure of personal data carried out in accordance with your rights stated above to each recipient to whom the personal data have been provided to, unless this proves impossible or involves disproportionate effort. If you want information about those recipients, you are welcome to [contact us](#).

Please note that our obligation to erase and inform according to above shall not apply to the extent processing is necessary according to the following reasons:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing by Union or Member State law which applies to us; or

- for the establishment, exercise or defense of legal claims.

### **Right to restriction of processing (Article 18 GDPR)**

You have the right to demand restriction of the processing of your personal data. You can make a request by [contacting us](#).

**In detail:** Your right applies if:

- the accuracy of the personal data is contested by you, during a period enabling us to verify the accuracy of the personal data,
- you have objected to processing pursuant to Article 21.1 GDPR pending the verification whether our legitimate grounds override yours,
- the processing is unlawful, and you oppose the erasure of the personal data and instead request the restriction of their use, or
- you need the personal data for the establishment, exercise or defense of legal claims even though we no longer need the personal data for the purposes of the processing.

Where the processing has been restricted according to above, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

We will notify each recipient to whom the personal data has been provided to about any restriction of processing according to above, if this do not occur to be impossible or entails a disproportionate effort. If you want more information about these recipients, you are welcome to [contact us](#).

### **Right to data portability (Article 20 GDPR)**

You have the right to receive your personal data from us in a structured, commonly used and machine-readable format and, where technically feasible, have your personal data transferred to another data controller (“data portability”). You can make such a request by [contacting us](#).

**In detail:** The right applies if:

- the processing is based on the lawful basis consent or on a contract, and
- the processing is carried out by automated means.

The exercise of the right to data portability shall be without prejudice to the right to erasure, i.e. Article 17.

Your right to data portability shall not adversely affect the rights and freedoms of others.

### **Right to object (Article 21 GDPR)**

You have the right to object to our processing of your personal data at any time. You can make such a request by [contacting us](#).

**In detail:** Your right to object applies as follows:

- You have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data which is based on Article 6.1 e or 6.1 f GDPR, including profiling based on those provisions. We shall no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.
- Where personal data are processed for direct marketing purposes, you have the right to object at any time to processing of your personal data for such marketing, which includes profiling to the extent that it is related to such direct marketing.
- Where you object to processing for direct marketing purposes, you have an unconditional right to have the processing of your personal data for such purposes ceased.



- In the context of the use of information society services, and regardless of Directive 2002/58/EC (ePrivacy Directive, or ePD), you may exercise your right to object by automated means using technical specifications.

### **Balancing of interests' assessments when processing personal data based on the legal basis "legitimate interests"**

As we state in the tables below, for some purposes, we process your personal data based on our "legitimate interest". By carrying out a balancing of interests' assessment concerning our processing of your personal data, we have concluded that our legitimate interest for the processing outweighs your interests or rights which require the protection of your personal data.

*If you want more information in relation to our balancing of interests' assessments, please do not hesitate to contact us. Our [contact information](#) can be found at the beginning of this Privacy Policy.*

## Detailed description of how we are processing your personal data

Below you can find a detailed description of how we process your personal data, i.e. why we process your personal data, what personal data we process, when you need to provide the personal data to us and the legal basis for our processing. The legal basis is the basis for processing your personal data according to the GDPR (General Data Protection Regulation). We make sure to only process your personal data in a way that is necessary based on our relationship. Below you will also find information about the duration of our processing of your personal data.

Not all information below is relevant for you and therefore we have provided the information under different headlines. Read the headlines that are relevant for you, i.e. based on how you come in contact with us.

*When we refer to “your company” in this Privacy Policy, we refer to your employer or the organization or public body that you represent. We will only process personal data about you in your business role.*

### My company uses Halon’s services

In the below charts you will find information about how we process your personal data when you and your company use our services and we therefore have received your personal data.

We collect your personal data directly from you or your company or another company that is co-operating with Halon.

To enable your company to use our services		
What processing we perform	What personal data we process	Our legal basis for the processing
<ul style="list-style-type: none"><li>- Provide you with relevant information and communicate with you as a user of our services</li></ul>	<ul style="list-style-type: none"><li>- Name</li><li>- Information about which organization you represent</li><li>- Position in your company</li><li>- Contact information, e.g. telephone number and e-mail address</li></ul>	<p>Legitimate interest (Article 6.1 (f) GDPR)</p> <p><i>Your personal data will be processed based on our <a href="#">legitimate interest</a> to enable you to use our services.</i></p>
<p><b>Storage period:</b> We will process your personal data for as long as your company is using our services, e.g. as our customer, however for a shorter period if we receive information that you no longer represent the company using our services.</p>		

To provide support to you and your company		
What processing we perform	What personal data we process	Our legal basis for the processing
<ul style="list-style-type: none"><li>- Provide you with relevant information and communicate with you as a user of our services</li><li>- Administrate support matters</li></ul>	<ul style="list-style-type: none"><li>- Information about which organization you represent</li><li>- Contact information, e.g. telephone number and e-mail address</li><li>- Information about the support</li></ul>	<p>Legitimate interest (Article 6.1 (f) GDPR)</p> <p><i>Your personal data will be processed based on our <a href="#">legitimate interest</a> to enable you to use our services and provide support.</i></p>

	matter	
<p><b>Storage period:</b> We will process your personal data included in the support communication until the matter has been resolved and for a relevant period thereafter. However, we will process your personal data for a shorter period if we receive information that you no longer represent the company using our services, e.g. our customer or if you ask us to delete your personal data.</p>		

To improve our services by sending surveys		
What processing we perform	What personal data we process	Our legal basis for the processing
<ul style="list-style-type: none"> <li>- Send you a request to participate in a survey regarding your use of our services</li> <li>- Handle any answers you leave in our surveys and compile statistics from the results of our surveys</li> <li>- Publish your answers on our website, if you have given your consent</li> </ul>	<ul style="list-style-type: none"> <li>- Name</li> <li>- Information about which organization you represent</li> <li>- E-mail address</li> <li>- Information you state in our surveys</li> </ul>	<p>Legitimate interest (Article 6.1 (f) GDPR)</p> <p><i>Your personal data will be processed based on our <a href="#">legitimate interest</a> to be able to contact you to evaluate our services and for us to improve our services.</i></p> <p>Consent (6.1 (a) GDPR)</p> <p><i>Your personal data will be processed based on your consent. You can withdraw such consent at any time by <a href="#">contacting us</a>.</i></p>
<p><b>Storage period:</b> You will continue to receive requests to participate in surveys as long as you use our services. If we receive information that you no longer represent the company or if you object to receiving surveys from us, we will stop sending surveys to you.</p> <p>We store information from your answers from surveys for three years and thereafter anonymize the personal data.</p>		

## I represent a potential customer, supplier or partner

Below you will find information about how we process your personal data if you represent a potential partner, supplier or customer (i.e. one of our business leads). To market our services, we may collect your personal data from the internet or a third-party service.

To market our services towards the company you represent		
What processing we perform	What personal data we process	Our legal basis for the processing
<ul style="list-style-type: none"> <li>- Store information about interesting business leads and potential partners and suppliers. We do this by the use of a CRM-system provided by <a href="#">HubSpot</a></li> <li>- Market us towards the company you represent, e.g. by e-mail, calls and marketing through <a href="#">LinkedIn</a></li> </ul> <p><i>LinkedIn will as well process your personal data in their own</i></p>	<ul style="list-style-type: none"> <li>- Name</li> <li>- Information about which organization you represent</li> <li>- Contact information, e.g. your e-mail address and/or phone number</li> <li>- Information from publicly available sources, e.g. information from the website of your company</li> <li>- Information you provide to us</li> </ul>	<p>Legitimate interest (Article 6.1 (f) GDPR)</p> <p><i>Your personal data will be processed based on our <a href="#">legitimate interest</a> to market our services towards the company you represent which we consider could be interested in our services or to have a business relationship with us.</i></p>

<i>right according to the information they provide to you</i> - Provide you with information based on the areas you are interested in and the industry you operate in	during our calls, e-mails etc.	
<p><b>Storage period:</b> We will register you as a potential lead first when you have shown some interest in our marketing efforts.</p> <p>We will continue to store and use your personal data for marketing purposes for as long as you interact with us and thereafter for as long as we find your company as a potential customer, supplier or partner. We will delete your personal data if you continuously choose to not answer when we contact you and we therefore can conclude that we will not enter into an agreement with your company.</p> <p>You can choose to unsubscribe or object to receiving newsletters and marketing at any time. If you object to receiving marketing from us, we keep track of this in our "<a href="#">unsubscribe-list</a>" to avoid sending you any further marketing material.</p>		

### I represent a customer, supplier or partner

In the below charts you will find information about how we process your personal data when your company is our customer, supplier or partner.

We collect your personal data directly from you. We may also collect your personal data from your company, if they state you as their representative.

To send you relevant marketing		
What processing we perform	What personal data we process	Our legal basis for the processing
- Send you information about updates, offers and other marketing - Send you invitations to events	- Name - Contact information, e.g. telephone number and e-mail address - Information about your job title - Information about the country you work in - Other information you provide us in agreements or in our communication	Legitimate interest (Article 6.1 (f) GDPR)  <i>Your personal data will be processed based on our <a href="#">legitimate interest</a> to send you information, invitations and other marketing that is relevant for your organization.</i>
<p><b>Storage period:</b> You can choose to unsubscribe or object to receiving information and marketing at any time. If you object to receiving marketing from us, we keep track of this in our "<a href="#">unsubscribe-list</a>" to avoid sending you any further marketing material.</p>		

To enter into an agreement with your company and administrate our relationship		
What processing we perform	What personal data we process	Our legal basis for the processing
- Discuss and enter into an agreement with your company - Administrate our relationship with your company (e.g.	- Name - Information about which organization you represent and position in your company	Legitimate interest (Article 6.1 (f) GDPR)  <i>Your personal data will be processed based on our <a href="#">legitimate</a></i>

communicate with our customer, supplier or partner). We do this by the use of a CRM-system provided by <a href="#">HubSpot</a>	<ul style="list-style-type: none"> <li>- Contact information, e.g. telephone number and e-mail address</li> <li>- Other information you provide us in agreements or in our communication</li> </ul>	<a href="#">interest</a> to negotiate and enter into an agreement with your company and to administrate our relationship with your company.
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**Storage period:** Your personal data will be deleted if we conclude that we will not enter into an agreement with your company and your company does not want to keep in contact with us.

If your company becomes our customer, supplier or partner, we will store your personal data for this purpose as long as the company you represent is our customer, supplier or partner and for a period thereafter in order to evaluate our previous business relationship and/or potential future business relationship.

If we receive information that you no longer represent the company, we will delete your data, except from agreements and similar documentation where your name is included.

To comply with accounting legislation		
What processing we perform	What personal data we process	Our legal basis for the processing
<ul style="list-style-type: none"> <li>- Store information in accounting material</li> </ul>	<ul style="list-style-type: none"> <li>- Name</li> <li>- History regarding payments made</li> <li>- Other information that constitutes accounting records</li> </ul>	<p>Legal obligation (6.1 (c) GDPR)</p> <p><i>The processing is necessary to comply with legal obligations to which we are subject, i.e. accounting legislation.</i></p> <p><i>You need to provide us with this information, in other case we will not be able to administrate our relationship with your company.</i></p>

**Storage period:** We will store any document constituting accounting material and the personal data included therein according to the storage period stated in the accounting legislation in Sweden. This means that we will store your personal data for seven to eight years.

According to Swedish regulation we need to store accounting material until and including the seventh year after the end of the calendar year for the fiscal year to which the personal data relates.

## I or my company have questions or queries

We always strive to maintain a good relationship with your company and to answer all questions you or your company may have. If you or your company have any questions or would like to make a complaint regarding one of our services, we will process your personal data as described below. We will collect your personal data from you or your company or collect the information ourselves.

Note that the ongoing matter may mean that we cannot delete all your personal data after your [request](#).

To handle any questions or complaints		
What processing we perform	What personal data we process	Our legal basis for the processing

<ul style="list-style-type: none"> <li>- Handle any questions or complaints</li> <li>- To defend ourselves against complaints</li> </ul>	<ul style="list-style-type: none"> <li>- Name</li> <li>- Information about which organization you represent and position at your company</li> <li>- Contact information, e.g. telephone number and e-mail address</li> <li>- Information concerning your company's complaint</li> </ul>	<p>Legitimate interest (Article 6.1 (f) GDPR)</p> <p><i>The personal data is processed based on our <a href="#">legitimate interest</a> to handle a question, complaint and/or legal dispute in which you are the representative of a customer, supplier or partner.</i></p>
<p><b>Storage period:</b> We will store your personal data from when the matter was initiated and for the duration of the potential dispute.</p>		

### I visit the website

We analyze how our website is used and show you relevant marketing on other websites you visit and on social media channels based on such analysis. This means that your personal data is processed when you visit our website. To protect your privacy, we have taken measures to avoid identifying you when you visit our website. For instance, we only process an encrypted version of your IP address to reduce the risk of being able to identify you.

We will collect your personal data from your device and from the companies we cooperate with (see below).

When you use our website, we will collect personal data by using cookies.

To analyze how our website is used in order to make improvements		
What processing we perform	What personal data we process	Our legal basis for the processing
<ul style="list-style-type: none"> <li>- Analyze how you use our website to improve our website and services. To do this we use our own analytic cookies and the analytic service from <a href="#">Google Analytics</a> and <a href="#">HubSpot</a></li> <li>- The analytic service means that we place a random ID on your device to distinguish your device from other visitors and to acknowledge patterns in how our website is used. We will however not know who you are</li> <li>- The personal data we collect will be used e.g. to optimize functions and to adapt the websites to suit our visitors</li> </ul>	<ul style="list-style-type: none"> <li>- An encrypted version of your IP address which we at Halon cannot connect to you as an individual</li> <li>- Information about your device/browser (which area in the country you use our website from and your screen resolution)</li> <li>- Information about your activities on the website</li> <li>- Other information Google and HubSpot has about you, e.g. information about from which site you found us</li> </ul>	<p>Consent (6.1 (a) GDPR)</p> <p><i>Your personal data will be processed based on your consent. You can withdraw such consent at any time by <a href="#">contacting us</a>.</i></p> <p><i>You can prevent Google Analytics from using your personal data by downloading and installing this <a href="#">browser add on</a>.</i></p>
<p><b>Storage period:</b> Your personal data will be used for this purpose by Google and HubSpot after your visit to our website.</p> <p>Google and HubSpot will continue to use your personal data for their own purposes and will inform you separately about such processing.</p>		

To show online marketing		
What processing we perform	What personal data we process	Our legal basis for the processing
<ul style="list-style-type: none"> <li>- We market our products and services by showing you offers and marketing online that we believe your company is interested in</li> <li>- We show you such marketing on other websites you visit. We do this by the use of <a href="#">Google</a>, <a href="#">HubSpot</a> and other marketing tools. You see marketing based on information that these companies have about you beforehand (so called <i>profiling</i>*)</li> </ul>	<ul style="list-style-type: none"> <li>- An encrypted version of your IP address which means we at Halon can't identify you as an individual</li> </ul> <p>Thereafter you will see search results and ads based on:</p> <ul style="list-style-type: none"> <li>- An analysis of how you use our website</li> <li>- Information that the marketing services we use have about you from before, e.g. information on which site you found us</li> </ul>	<p>Consent (6.1 (a) GDPR)</p> <p><i>Your personal data will be processed based on your consent. You can withdraw such consent at any time by <a href="#">contacting us</a>.</i></p> <p><a href="#">Here</a> you can make choices about the marketing you see from Google.</p>
<p><b>Storage period:</b> We will continue to store and use your personal data for marketing purposes for as long as you interact with us and during our use of the marketing services.</p> <p><a href="#">Google</a> will continue to process your personal data for their own purposes, i.e. as a controller. Information on how long they store your personal data can be found in their privacy information.</p>		

\* **Profiling:** We use so called profiling to be able to show you offers that are relevant to you and to provide you with customized marketing. We use profiling so that you can see relevant marketing instead of general offers and information which you may not be interested in. You have the right to object to profiling as described above under the section explaining [your rights](#).

## I have requested a demo or downloaded content

The chart below describes how we process your personal data if you have requested a demo or downloaded content. We collect your personal data directly from you and provide some personal data ourselves by analyzing how you use our newsletters.

If you have chosen to object to receiving marketing from us, we will store information about you in order to avoid sending you any further marketing material.

To provide you with relevant information and marketing		
What processing we perform	What personal data we process	Our legal basis for the processing
<p>Send information about news, marketing, offers and invitations ("newsletters") and to call you after you have requested a demo or downloaded content.</p> <p>Provide you with the demo or downloaded content that you have requested.</p>	<ul style="list-style-type: none"> <li>- Your name</li> <li>- Contact information, e.g. telephone number and e-mail address</li> <li>- Information about which organization you represent</li> <li>- Information about your job title</li> </ul>	<p>Consent (6.1 (a) GDPR)</p> <p><i>Your personal data will be processed based on your consent. You can withdraw such consent at any time by <a href="#">contacting us</a>.</i></p>
<p>Improve and develop our newsletters by analyzing how you open them and what you click on</p>	<ul style="list-style-type: none"> <li>- Information about how you open our newsletters and what you click on</li> </ul>	<p>Consent (6.1 (a) GDPR)</p> <p><i>Your personal data will be processed based on your consent.</i></p>

in the newsletters <i>Do you want to read more about this type of analysis? You find a more detailed description of this in our information about <a href="#">cookies</a>.</i>	<ul style="list-style-type: none"> <li>- IP-address</li> <li>- E-mail address</li> </ul>	<i>You can withdraw such consent at any time by <a href="#">contacting us</a>.</i>
<b>Storage period:</b> You can choose to unsubscribe or object to receiving newsletters and marketing at any time. If you object to receiving marketing from us, we keep track of this in our " <a href="#">unsubscribe-list</a> " to avoid sending you any further marketing material.		

To comply with marketing legislation		
What processing we perform	What personal data we process	Our legal basis for the processing
<ul style="list-style-type: none"> <li>- If you have stated that you do not wish to receive marketing from us, we will store such information in an "unsubscribe-list" to make sure we do not send any marketing to you</li> </ul>	<ul style="list-style-type: none"> <li>- Name</li> <li>- E-mail address</li> </ul>	<p>Legal obligation (6.1 (c) GDPR)</p> <p><i>The processing is necessary to comply with legal obligations which we are subject to, i.e. marketing law, which require us not to send marketing material to individuals who have objected to receiving such marketing.</i></p> <p><i>We cannot make sure you will not receive marketing from us without processing your personal data for this purpose and you are therefore required to provide your personal data to us.</i></p>
<b>Storage period:</b> You will be listed in our "unsubscribe-list" until further notice.		

## I participate in an event

Below you find information about how we process your personal data if you participate in any of our events. We collect your personal data directly from you. We may also collect your personal data from your company, if they give us your information.

To arrange events and webinars		
What processing we perform	What personal data we process	Our legal basis for the processing
<ul style="list-style-type: none"> <li>- Administrate your registration to one of our events</li> <li>- Communicate with you as a representative of our current or potential customer, supplier or partner before and during the event</li> </ul>	<ul style="list-style-type: none"> <li>- Name</li> <li>- Information about which organization you represent and position in your company</li> <li>- Contact information, e.g. telephone number and e-mail address</li> <li>- Dietary preferences you have informed us about (if applicable)</li> </ul>	<p>Legitimate interest (Article 6.1 (f) GDPR)</p> <p><i>Your personal data will be processed based on our <a href="#">legitimate interest</a> to be able to arrange events for you as a representative of a current or potential customer, supplier or partner to Halon.</i></p> <p>Consent (6.1 (a) GDPR)</p> <p><i>If we process sensitive personal</i></p>



		<i>data such as information about your allergies, we will obtain your consent.</i>
<b>Storage period:</b> A participant list that you are part of will be stored after the event in order for us to be able to follow up your participation in the event and invite you to similar events. We will delete your personal data if you ask us to.		

To publish photos/videos from an event on our website and social media channels		
What processing we perform	What personal data we process	Our legal basis for the processing
<ul style="list-style-type: none"> <li>- Take photos of you during an event</li> <li>- Publish your photo on our website and/or on our social media channels to be able to market our events</li> </ul> <p><i>Your personal data will only be processed for this purpose after you have been given information about our publication of photos and if you have not objected to our processing.</i></p>	<ul style="list-style-type: none"> <li>- Your image, either in photos or video material</li> </ul>	<p>Legitimate interest (Article 6.1 (f) GDPR)</p> <p><i>Your personal data will be processed based on our <a href="#">legitimate interest</a> to be able to document our events and make use of footage from the event for marketing purposes.</i></p> <p>Consent (6.1 (a) GDPR)</p> <p><i>In cases where we want to process footage where you are clearly depicted, we will obtain your consent.</i></p>
<b>Storage period:</b> If we have published a photo or video of you from our event on our intranet or website, the photo or video will stay published until you ask us to delete it.		
Photos or videos of you that have been published on our social media channels will be published until you ask us to delete them.		

### I interact with Halon without having a business relationship, e.g. I communicate with Halon through social media channels

If you are in contact with us without having a business relationship with us, e.g. by sending us an e-mail or a message through our social media account, we will process your personal data as we describe in the charts below. We will process the personal data which you provide to us and information from your social media account (if you use such account to communicate).

When contacting us through a social media channel, we suggest that you also familiarize yourself with the privacy information of that platform.

To communicate with you		
What processing we perform	What personal data we process	Our legal basis for the processing
<ul style="list-style-type: none"> <li>- Communicate, e.g. via e-mail or contact form on our website</li> <li>- Communicate via social media, e.g. if you make a comment on our site or on our social media</li> </ul>	<ul style="list-style-type: none"> <li>- Information you provide to us, e.g. name, which company you represent and contact information</li> </ul> <p>If you visit our social media</p>	<p>Legitimate interest (Article 6.1 (f) GDPR)</p> <p><i>Your personal data will be processed based on our <a href="#">legitimate interest</a> to communicate with you</i></p>

<p>page</p> <ul style="list-style-type: none"> <li>- Answer your questions and give you the best service</li> </ul>	<p>channels we also process:</p> <ul style="list-style-type: none"> <li>- Information from your profile on the social media in question (username and any picture you have chosen for your account)</li> <li>- Other information regarding the matter for which you contact us</li> </ul>	<p><i>once you have contacted us.</i></p>
<p><b>Storage period:</b> Your personal data will be stored for as long as necessary, so that we can give you the best service.</p> <p>Your comments and communication with us on our social media channels can be deleted by you at any time. We will remove posts or comments which are in breach of the rules of the platform or in conflict with legislation as soon as possible.</p>		

This Privacy Policy was adopted by Halon on 5<sup>th</sup> of October 2023.