

Privacy Policy

Privacy Policy for Holid

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1. Introduction

Thank you for choosing us and a special thanks for taking the time to thoroughly read through this Privacy Policy. We would like to begin with a short summary explaining why we have created this policy. Our fundamental objectives are to

- Give you a brief introduction to personal data and our different roles in this context
- Explain why we handle certain kinds of personal information
- Ensure that you understand what information we gather and what we actually do with said information;
- Show you how we work to protect your rights and your integrity.

Our goal is that you, after having read this policy, will feel secure in that your personal integrity is respected and that your personal data is treated in a correct manner. We therefore also work on a continuous basis with securing that our treatment of personal data is completely in compliance with current legislation, especially the General Data Protection Regulation (GDPR) which will be in effect as of May 25th 2018.

2. What is personal data and what does the processing of personal data mean?

2.1 Personal data consists of all information that directly, or indirectly together with other information, can be connected to a living (physical) person. A non-exhaustive list with examples of personal data consists of, among others:

- Name
- Personal ID number
- Email-address
- Home address
- Phone number
- IP-address

2.2 The Processing of personal data includes every action connected to the use of the personal data, regardless of whether such an action is performed automatically or not. This means that the following actions, among others, are included:

- Collection
- Registration
- Use
- Alteration
- Storage
- Disclosure by transmission
- Deletion

3. For whom is this policy applicable?

This Privacy Policy shall in the first instance be applicable to individuals who choose to work with us and from whom we collect personal data ("Data Subjects"). Different parts of this Privacy Policy may also be relevant to you depending on your relationship with us. All in all, this policy is relevant for persons who

- are clients of ours
- visit our website or our social media platforms
- otherwise communicate with us, for example through our customer service

By agreeing to this Privacy Policy you agree to our processing of your personal data in accordance with this Privacy Policy.

4. For what areas is this policy applicable?

This Privacy Policy regulates how we may collect and process personal data to be able to continue delivering and developing our Services.

5. What does it mean to be a Data Controller?

A Data Controller is a legal person or other entity that determines the purpose and means for the processing of personal data. A corporation is a Data Controller in regards to personal data it has for its own benefit in regards to its employees, customers, partners, users and others.

6. Holid as a Data Controller

We, Holid AB (company reg. no. 559071-2955) are the Data Controller and therefore accountable in accordance with applicable legislation, for the processing that occurs with your personal data, within the scope of our Services.

7. Why are we allowed to process personal data?

7.1 For it to be permissible for us to process personal data there must always be support for said treatment within the GDPR, so-called lawful basis. Such lawful basis may include:

- **Consent** from the Data Subject
- That the processing of personal data is necessary to **fulfill the terms of an agreement** with the Data Subject, for example in relation to the use of the Services
- **Fulfilling a legal obligation**, for example storing certain information due to legislation regarding certain accounting standards and practices. This could also be the case when handling opt-out settings requests concerning your rights as a Data Subject in accordance with GDPR
- A weighing of interests when we have a **legitimate interest** in using your data, for example for statistical purposes and to market our services, and to secure payment and prevent fraud

7.2 It may occur that the same personal data is processed both in terms of fulfilling an agreement as well as in terms of specific consent or in terms of processing specific information which is necessary to fulfill other legal obligations. This means that even though you may revoke your consent and the treatment based on said consent ceases, that specific personal data may remain with us for separate reasons.

8. Holid's relationship to its clients

In compliance with the General Data Protection Regulation (GDPR), we at Holid wish to inform you about how we work with our Publisher clients and how, in this context, personal data is being handled. For more information, please see "Holid's General Terms and Conditions regarding the processing of personal data"

9. What personal data do we process, and why?

In this section, we explain how your personal data is used in order for us to be able to provide you with high quality services.

9.1 *When you communicate with us*

You can choose to communicate with us in many different ways, for example via social media and through emails with our customer service.

When you communicate with us, we process data which you personally provide to us, for example:

- name and contact information
- information regarding your views, questions, or matters

9.1.1 We process your personal data in order to:

- answer questions and handle your matters, for example addressing complaints, handling questions about assignments, etc.

- improve our services and the information we provide and publish on our website and other forums of communication

9.1.2 Legal grounds for the processing:

We process your personal data for our, and your, legitimate interest in administering your matter (*weighing of interests*).

9.1.3 Period of storage:

We save your personal data for up to 12 months after the matter is closed in order to ensure traceability in your communications with us.

9.2 When you use our website

When you visit our website, we process:

- data about how you interact with, and use, our website
- information regarding your visits to our website, through cookies. For more information about how we use cookies, please see “Cookiepolicy”

9.2.1 We process your personal data in order to:

- provide our digital services
- provide support when you encounter any kinds of technical problems
- maintain, test, and improve our digital services
- discover and prevent security attacks, for example virus attacks

9.2.2 Legal grounds for the processing:

We process your personal data based on:

- a *weighing of interests* for our legitimate interest in maintaining, testing, and improving our digital services.

9.2.3 Period of storage:

We save your personal data for 3 months after you have used our digital channels.

10. How long do we generally store personal data?

Your personal data is stored only during the period for which there is a need to store the information to be able to fulfill the terms of the agreement. We may store your personal data longer if this is necessary from a legal standpoint or to safeguard our legal interests, for example within the scope of legal proceedings that we are involved in.

11. Our actions to protect personal data

11.1 We have ensured that we have taken all necessary and appropriate technical and organizational measures to safeguard your personal data against loss, misuse or unauthorized access.

11.2 To technically ensure that personal data is processed in a safe and confidential manner we use digital networks that are breach protected through for example encryption, fire walls and password protection. In any instance where a breach may occur we have created routines to identify, assess and minimize any damage that may occur as well as report said damage to all affected parties.

11.3 To ensure an adequate knowledge level regarding processing of personal data we will arrange ongoing educational efforts regarding GDPR, both for our employees as well as the consultants that may from time to another be contracted to do work for us.

12. When do we share personal data?

12.1 We will not sell, make available or spread personal data to third parties with the exception for what is stated throughout this Privacy Policy. Within the scope of the Services personal data may be shared to subcontractors or partners, if this is necessary for the fulfillment and performance of our Services, for example to process your payments. In any instance where we choose to share personal data we will enter into a Data Processing Agreement to ensure that the recipient of the personal data processes said information in accordance with applicable legislation as well as to ensure that the recipient has taken the necessary technical and organizational actions to, in a satisfactory fashion, be able to protect the rights and freedoms of you as a Data Subject.

12.2 Furthermore we may share personal data if we are required to do so by law, court order or if withholding such personal data would hinder any ongoing legal investigation.

13. Your rights

13.1 We are responsible for your personal data being processed in accordance with applicable legislation.

13.2 Upon your request, or at our own initiative, we will correct, de-identify, delete or complete any information that has been found to be wrongful, incomplete or misleading.

13.3 You have the right to demand access to your personal data. This means that you have the right to demand transcripts regarding the processing that we have maintained over your personal data. You also have the right to receive a copy of the personal data that are being processed. You have the right to, once a year and through written application, without cost receive a transcript regarding what personal data is stored in regards to you, the purpose of the storage and processing as well as to whom said information has been made accessible. You also have, within the transcripts, the right to be informed of the period of time in which the personal data will be stored and what criteria we have used to determine said period of time.

13.4 You have the right of correction of your personal data. We will, upon your request and as quickly as possible correct the incorrect or incomplete personal data we process in regards to you.

13.5 You have the right to demand deletion of your personal data. This means that you have the right to demand that your personal data is removed if it is no longer necessary for the objectives for which it was gathered. There may exist legal requirements stating that we may not immediately delete personal data (for example in terms of auditing and taxation related

legislation). We will in any such case cease the processing being done for any other reasons than to adhere to the legislation of GDPR.

13.6 You have the right to object to any processing of personal data that is carried out on a lawful basis of weighing of interests. If you object to such processing we will only continue the processing if there are legitimate reasons for the processing that outweigh your interests.

13.7 If you do not want us to process your personal data for direct marketing, you always have the right to object to such processing. This is done either by unregistering in each specific email or by sending us an email at support@holid.se When we have received your objection we will cease the processing of personal data for any such marketing. You also have the right to report our processing of your personal data to any public authority responsible for monitoring the application of the GDPR, for example The Swedish Data Protection Authority in Sweden. However, we do recommend that you contact us first so that we can try solving the matter in a more efficient and timely manner.

14. Cookies

When you visit our website, we may also collect information and data about you by using what is referred to as cookies. For more information about how we use cookies, please see "Cookiepolicy".

15. Changes to this policy

We reserve the right to make amendments to this Privacy Policy from time to another. The date for the latest amendment is stated at the end of this Privacy Policy. If we make any amendments to the Privacy Policy we will publish these amendments on our website. You are therefore recommended to read this Privacy Policy regularly to view any potential amendments.

16. Contact

Holid AB (company reg. no. 559071-2955) is the Data Controller for the processing of your personal data. If you would like to have additional information on how your personal data is handled, please contact us through a written and personally signed request sent to:

Holid AB

Götgatan 22a

118 46 Stockholm

In the letter, please include your name, address, email, telephone number and personal ID number. Please also enclose a copy of your ID. A reply will be sent to your address as stated in the National Population Register.

Privacy notice regarding the processing of personal data

In compliance with the General Data Protection Regulation (GDPR), we at Holid wish to inform you about how we work with our Publisher clients and how, in this context, personal data is being handled.

We pride ourselves on delivering high quality solutions to our clients (“Publishers”) who wish to excel in digital marketing, improve their online conversion rates and maximize their marketing budget. In the process of providing our services to a Publisher, Holid and the Publisher will be independent Controllers of personal data processed through the websites which are a part of the Publisher’s website catalogue. This means that both companies individually determine the purposes and means of the way that they themselves handle personal data. The purpose of such an arrangement is that both companies will have a similar responsibility for processing the data of the website visitors, only within different scopes of processing.

All Publishers working with Holid have agreed to maintain and abide by a publicly accessible Privacy Policy that satisfies the requirements of informing the website visitors about Holid and their role as an independent Controller of personal data. For added transparency, the Publishers must also include, in their website’s Privacy Policy or another location at the website easily accessible to the website visitors, a link to the information available at the Holid website which, in detail, explains the arrangement between the Publisher and Holid regarding the processing of the website visitors’ personal data. For that purpose, we have recommended that all Publishers incorporate a paragraph with the following wording:

“When you visit our website, we want to make sure that all ads are custom made to reflect your personal likes and preferences. To help us achieve this goal and create a better user experience for you and everyone else, we work together with a company called Holid. Our collaboration means that Holid may, in a very limited capacity, handle some of your Personal data when referring said data to ad networks. Therefore, they will be a Controller of your personal data for this purpose. However, by default, Holid will not process your Personal data. To learn more about Holid, Processing of Personal data as well as your rights of access to data, etc. please see “Holid’s General Terms and Conditions regarding the processing of personal data”.

When providing our services, we at Holid will only be able to process the website visitors’ data in the scope limited to referring the data gathered by the Publisher to various advertising networks. As the data is passed directly between the Publisher and the advertising networks, Holid will not collect, store, access or in any other way process personal data. In the remaining scope, i.e. everything that does not involve said referral of data, all personal data will be processed exclusively by the Publisher.

The Publisher will be the point of contact for all matters connected with the processing of the website visitor’s personal data. These means that any inquiries and applications from website visitors, in regards to exercising their rights in accordance with the GDPR will be handled by the Publisher.

If a website visitor submits an inquiry or an application to Holid, in regards to exercising her rights in accordance with the GDPR, said inquiry or application will immediately without undue delay be transferred to the Publisher, and the Publisher is liable for consideration of the inquiry or application, as if it was placed directly by the website visitor to the Publisher.

Holid will also refer any request to access personal data from the Data Protection Authority (*Datainspektionen* in Sweden) or any other third party to the Publisher.

When providing our services, we at Holid do not at any point in time, neither directly nor indirectly, process or have access to the website visitors' personal data. Therefore, the Publisher is liable for exercising any rights which the website visitors are entitled to in accordance with the GDPR, including the right of access to data, the right to correct data, the right to obtain copies of data, the right to remove data and the right to object.

The Publisher must always present relevant information on personal data processing to the website visitors. They must also obtain and record, for all websites connected to the services of Holid, necessary permission and valid consent from the website visitors on behalf of all recipients of the website visitors' Personal Data, in accordance with the GDPR as well as any additional standards provided through industry protocol, such as the *IAB Europe Transparency and Consent Framework*. This means that the Publisher must ensure that ads are presented at their websites only to the website visitors who expressed consent in accordance with the provisions set forth in this privacy notice.

Holid's General Terms and Conditions regarding the processing of personal data

Definitions

Concepts related to Personal Data shall be interpreted and applied in accordance with what is provided for by the GDPR.

In addition to the above, the following expressions shall have the following meaning in this annex:

"Ad Network" refers to companies that mediate digital ads, i.e. ads intended for internet advertising, from advertisers to website owners.

"Assistant Data Controller" means a physical or legal person, public authority, institution or other body that Processes personal data on behalf of the Data Controller.

"Assistant Data Processing Agreement" means an Assistant Data Processing Agreement between Data Controller and Assistant Data Controller.

"Applicable legislation" includes the GDPR as well as the Data Inspection Authority's and relevant EU body's regulations, statements and recommendations in the field of personal data.

"Data Controller" means a physical or legal person, public authority, institution or other body that alone or jointly determines the purposes and means of the Processing of personal data; if the purposes and means of the Processing are determined by Union law or national law of the Member States, the data controller or the specific criteria for his appointment may be provided for by Union law or national law of the Member States.

"GDPR" refers to Regulation (EU) 2016/679 of the European Parliament and of the Council.

"Industry practice" refers to custom or practice trained in a particular industry. Within the scope of the Agreement, Industry Practice consists of, but is not limited to, compliance with the Interactive Advertising Bureaus transparency & Consent Framework.

"Processing" refers to any kind of actions performed with data and / or Personal Data, for example collection, registration, organization, structuring, storage, processing, modification, extraction, reading, use, disclosure, dissemination or otherwise providing, alignment or merging, restriction, deletion or destruction.

"Personal Data" refers to any kind of information that can directly or indirectly be attributed to a physical person who is alive and who is processed for the benefit of Visitors.

"Sub-processor" refers to the subcontractor engaged by the Data Processor or by another of the Data Processor's Sub-processors and who agrees to receive Personal Data from the Data Processor or another of the Data Processor's Sub-processors for the sole purpose of processing the Personal Data on behalf of the Data Controller in accordance with the Data Controller's instructions, the terms of this Data Processing Agreement, and the terms of a written subcontractor agreement.

"Supervisory Authority" means an independent public authority designated by Sweden in accordance with Article 51 of the GDPR.

"Third party" refers to a physical or legal person, public authority, institution or organization that is not the Registered, the Data Controller, the Data Processor, the Sub-processors or the persons who are authorized to process the Personal Data under the direct responsibility of the Data Controller or the Data Processor.

"Visitor" refers to the physical persons who visit the Publisher's Websites, whose Personal Data is Processed by the Data Controller, Assistant Data Controller, Subprocessor or Third party.

"Website or Websites" refers to the websites for which Holid, on behalf of the Publicist, provides its Services.

Background

The Parties have entered into an agreement where the Publicist has commissioned Holid to provide its Services (the Agreement). In this context, there is a contractual obligation for Holid, due to the company's relationship with various Advertising Networks, to require the Publicist's compliance with Applicable legislation and current Industry practice in the Processing of personal data in a written agreement with the Publicist. This appendix reflects the content of this agreement. In addition, the Parties, as a result of the provisions of Applicable legislation, have also chosen to clarify their mutual relationship with regard to the Processing of personal data belonging to Visitors of the Websites through this addition to the Agreement.

1. Independent responsibility for personal data

The Agreement and its terms imply that the Parties have assessed that they will separately Process Visitors' personal data in the role of independent Data Controller.

2. Scope of Processing of personal data

Within the framework of the parties' contractual relationship, the parties agree that Holid, in providing its services, neither directly nor indirectly has access to, or otherwise processes, Visitors' Personal Data. Holid therefore undertakes to only Process information about Visitors within the scope of referring Publicist's data to the Advertising Networks ("the Scope"). This means that all Processing of Personal Data covered by this Agreement and carried out outside of the Scope shall be performed by the Publicist, as well as its possible Data Processors and Sub-processors, on behalf of the Publicist.

3. The publisher's obligations

3.1 The publisher shall not make Visitors' personal data available to Holid, either by transfer or by any other type of processing. If Holid notices that, as a result of the publisher's breach of this clause or for any other reason, they are processing Visitors' personal data, Holid shall without undue delay notify the publisher of this in writing, whereupon necessary measures shall be taken immediately to ensure that the processing ceases.

3.2 For each website covered by the Agreement, in accordance with Applicable law and as part of the website's privacy policy available to the public, the publisher shall inform Visitors about

- how their personal data is processed;
- the arrangements between the parties;
- the rights they have;
- how these rights can be exercised

3.3 The publisher shall obtain and ensure that consent has been obtained, in accordance with Applicable law and current industry practice at the time, for all Processing of Visitors' Personal Data.

4. Holid's obligations

In the event that a Visitor, Supervisory Authority or other Third Party requests a register extract, supporting documents or other information from Holid regarding the Processing of Visitors' Personal Data, Holid shall without unnecessary delay refer such request to the publisher, who shall be solely responsible for the complete handling of each individual case.

5. Liability

5.1 In the event that a Visitor, Supervisory Authority or other third party raises a claim against either party regarding the Processing of Personal Data, the publisher shall hold Holid harmless from any claims relating to Processing of Personal Data outside the Scope or otherwise caused by the publisher's breach of the Agreement, Applicable law or Industry practice.

5.2 In the event that a Visitor, Supervisory Authority or other Third Party raises a claim against either party regarding the Processing of Personal Data, Holid shall hold the publisher harmless from any claims relating to Processing of Personal Data within the Scope or caused by Holid's breach of the Agreement, Applicable law or Industry practice.

5.3 The parties are aware that this annex shall come into effect only upon the use of Holid's services.

Cookiepolicy

At Holid we use cookies on our website. A cookie is a small text data file that is saved in your browser when you visit websites using a computer, mobile phone or other digital devices.

We use cookies for technical reasons and to make our web services easier for our visitors to use. We also use cookies to monitor traffic to our website and for statistics.

What different types of cookies are there?

A cookie can either be classified by its lifespan or by the domain to which it belongs. By lifespan,

a cookie is either a:

- a **session cookie** which is erased when you close your browser or
- a **persistent cookie** which remains on your computer/device for a pre-defined period of time.

Session cookies enable us to keep track of your movement from page to page on our website so you don't get asked for the same information you've already given to the site. Cookies allow you to proceed through many pages of our website quickly and easily without having to authenticate or reprocess each new area you visit.

A persistent cookie enables us to remember you on subsequent visits, speeding up or enhancing your experience of our services or functions offered.

As for the domain to which a cookie belongs, there are either:

- first-party cookies which are set by us as the owner of the visited website (in this case <https://www.holid.io>) or
- third-party cookies which may be set by another website.

How we use cookies

We use cookies so that you can use our website in the way we intended and to be able to give you, the visitor, better service and a better user experience. Some of our cookies are required in order for our website to work properly. These cookies are used, for example, to support several simultaneous visitors to the website and to remember your actions on our website.

In addition, cookies are used to gather statistics regarding the number of visitors to the website and to collect information about how our website is being used and how we can improve its content, navigation, and structure. Lastly, we use cookies for marketing purposes.

What kind of information do we collect by using cookies?

When you visit our website, we may automatically collect the following types of information from you:

- Internet protocol (IP) address,
- Login information
- Time zone setting
- Operating system and platform
- Information about your visits including the URL you came from, your country, the search terms you used in our website, products you viewed or searched, page response times, download errors, length of visits to certain pages, page interaction information, (such as scrolling, clicks, and mouse-overs) and the methods used to browse away from the page.

Social networks and other third-party websites

Our website occasionally embeds sharing tools from social network sites such as Facebook and Instagram. These suppliers may, therefore, use cookies on our website. We have no access to, nor any control over, these cookies and the information collected. We recommend that you check the relevant third-party website(s) for more information about these cookies and how you can choose to block them.

How can you block cookies?

Most browsers allow you to refuse cookies. You may block our cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. You can find out more about cookies by clicking your way to the help section in your browser menu.

If you block our use of cookies, you may be unable to access certain areas of our website and certain functions and pages will not work in the usual way.

Questions about our website

If you have any questions about our use of cookies or any other questions regarding your experience of our website, please feel free to contact us

Contact

Holid AB (company reg. no. 559071-2955) is the Data Controller for the processing of your personal data. If you would like to have additional information on how your personal data is handled, please contact us through a written and personally signed request sent to:

Holid AB

Götgatan 22A

118 46 Stockholm

In the letter, please include your name, address, email, telephone number, and personal ID number. Please also enclose a copy of your ID. A reply will be sent to your address as stated in the National Population Register.