

# The VIDEM Privacy Notice

*Last updated on: 2024-01-23*

Welcome. We are VIDEM AB and this notice explains our policy on how we protect your data and our commitment to your right to privacy.

## Our role in your privacy

This policy applies to customers, partners, contact, or visitors of our website. If you are in contact with VIDEM AB as a customer, partner or contact our privacy policy is enforced either by contract or other written agreements. As a website visitor, no personal data is collected during your visit until you choose to contact us. Upon contacting us we will collect and process any personal data included by you in your email for no longer than deemed necessary by us to ensure we fulfil either lawful obligations or our legitimate interests. You can always contact us to withdraw consent for the data processing, see further under Your Rights.

## Our responsibilities

We act as Data Controller, meaning we decide if we have a lawful purpose to your personal data and decide how to process the data. As of now, VIDEM does not outsource any data processing to any other legal or natural person, companies or authorities, and therefore also act as Data Processor of your personal data. We act as a joint controller together with LinkedIn for our LinkedIn page.

This privacy policy does not address personal data which is processed in the context of our product development, that data is managed by the applicable regulations requirements on confidentiality regarding patient data.

### **Data protection officer**

As VIDEM AB does not have the role as a public authority or body, or handles any personal data on a large scale, there is no designated data protection officer. What that means for you in your contact with us is that there is no separate contact point other than the one written at the end of this notice.

## Your responsibilities

- Read this privacy policy
- If you contact us via email and provide us with personal data regarding you or other persons, we only use the data for the specific purpose you provided it for. By providing us with the data you confirm that you have the right to authorise us to process the personal data in accordance with this Privacy Policy
- By providing us with personal data that can infer special categories of personal data, for example writing in your CV your nationality or providing a photograph infers your ethnic origin, you are giving us explicit consent to process the data
- If you follow us on LinkedIn, read the privacy policy of LinkedIn.

## What data do we collect?

Our company collects the following data:

- Personal identification information (i.e., name, email address, phone number)
- Workplace data and information regarding education (i.e., company affiliation, job title, education level honorifics, education categories and levels)
- Contents of provided information (i.e., email content, messages etc.)

If personal data of sensitive nature is provided, such as ethnic origin, political opinions, religious beliefs, trade union memberships (see further article 9(1) of EU Regulation 2016/679), it is immediately deleted because we have no legitimate interest in processing that data.

## How do we collect your data?

Most of the data we collect are directly provided by you. We collect and process the data when you:

- Voluntarily register to newsletters, surveys or feedback boards on our website
- Voluntarily emails any of our contact addresses
- If you follow us on our social media
- Through researching publicly available information (e.g., websites, career sites, social media) to contact you in accordance with our interests
- Your information being provided by a third party, for example through industry networks

## How do we use your data and for what purpose?

We collect and process your data for one or more of the following purposes (i.e., our legitimate interests):

- Carrying out contractual obligations between us and customers or partners, additional conditions and information to this policy is provided in those contracts
- Managing enquiries or other requests regarding our products and services
- Ensuring compliance with legal obligations and for the enforcement of contractual agreements
- Managing the security of our products, services, intellectual property rights and other offers
- Marketing, surveys and communications as they relate to our products and services, including user interactions
- Establishing relationships to benefit our customers, products and services
- For recruitment purposes

VIDEM AB does not share your data with third parties unless consented. We perform no automatic processing of data on your personal data.

## How do we store and protect your data?

We will not store your data for longer than is deemed necessary compared to the purpose of the processing. We will keep your data for the remainder of any established contract or legal obligation.

We securely store your data in password protected databases with limited access provided in VIDEM AB. This includes our email servers that are maintained by Google, and in the tool Notion.

If we have collected your data through market research or provided by separate third parties for our legitimate interest (e.g., investing, marketing), we will provide you with this Privacy Notice upon. Then your personal data will be kept in a database in Notion and evaluated every 3 months for our continued right to process. If no contact has been established and we evaluate that there is no legitimate interest for us to process the data, it will be removed from said database. If we have sent so called 'cold emails', to which you have not replied and consented, the data will be kept in the same database until a yearly review is performed for establishing a legitimate reason to keep the data. In our email, the sent cold email, that includes at minimum your email address as personal data, will be saved for as long as we are exercising our legitimate interest, but for a maximum of 3 years.

If data is provided to us and considered to not fulfil any of above mentioned purposes, meaning we have no lawfulness in our processing, the person or company who provided the data will be notified and the data will be deleted.

## Your rights

To ensure fair and transparent processing, we would like to make sure that you are fully informed of your data protection rights. Every data subject is entitled to the following:

**The right to withdraw consent** - if you have given us consent to your personal data you have the right to withdraw this consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

**Your right to access** - You have, under certain conditions, the right to request information regarding the source of information if not provided by yourself. You have the right to request us for copies of your personal data. If additional copies are requested, we might charge you a small fee for that service. When a request is lodged electronically, the copy will be provided in a common electronic format.

**The right to rectification** - You have the right to request that we correct any of your data that you believe is inaccurate and also to complete information if you believe it is incomplete.

**The right to erasure "right to be forgotten"** - You have, under certain conditions, the right to request that we erase your personal data.

**The right to restrict processing** - You have, under certain conditions, the right to restrict our processing of our data. This does not affect previous processing made from initial specific purpose consent.

**The right to object to processing** - You have, under certain conditions, the right to object to us processing your personal data.

**The right to data portability** - You have, under certain conditions, the right to request that we transfer the data we collected to another organisation or directly to you. We might charge you a small fee for this service.

**The right to lodge a complaint with supervisory authorities** - You have, without prejudice to any other administrative or judicial remedy, the right to lodge a complaint with a supervisory authority in your habitual place of residence, your place of work or the place of the alleged infringement. Under contacts, the supervisory authority in the Member state of VIDEM ABs place of business is listed.

Under certain conditions could refer to if VIDEM has legal obligations to maintain your personal data. If we are legally obliged to keep your personal data for specific purposes, we can explore if the option of pseudonymisation could be an alternative that works for you.

## Communication

This Privacy Policy shall always be accessible at our website, [videm.com](https://videm.com), and all our social media. If we contact you, you will receive this privacy policy upon initial contact attached or linked in the contact media form. If your contact information was provided to us, we will provide you with this Privacy Policy upon first contact.

## Changes to this policy

You will always see the date of the last update in the first section of this document. It is regularly reviewed and updated according to applicable laws and internal procedures.

## Contact information

If you have any questions or wishes to request anything in accordance with this Privacy Policy, please contact us by using the information below.

VIDEM AB  
Vasagatan 5B  
SE-411 24 Gothenburg  
Sweden  
E-mail: [info@videm.se](mailto:info@videm.se)  
Web: [videm.se](https://videm.se)

Swedish Supervisory Authority:

Swedish Authority for Privacy Protection

Integritetsskyddsmyndigheten

Box 8114, 104 20 Stockholm

Sweden

Phone: +46 (0)8 657 61 00

E-mail: [imy@imy.se](mailto:imy@imy.se)

Web: [imy.se](http://imy.se)