

Spiideo Dataset Privacy Policy

v. 1.1 eff. 12 December 2024

In this Privacy Policy, “we,” “us,” “its” and “our” refer to Spiideo AB, a Sweden corporation, and “you” and “your” refer to you. Before using the Spiideo Dataset website(s) and site pages containing the link to this policy (the “Site”), please read carefully this Privacy Policy (“Policy”) relating to your use of the Site.

By using the Site, you consent to:

- the collection and use of personal information and data as set forth in this Policy; and
- emails (of which you may opt-out at any time) sent to notify you of Site activity.

Californians: please refer to the California Privacy Rights notice at the end of this Policy.

A. Introduction

This Policy tells you how we use and protect personal information and non-personal information and data collected through use of the Site. This Policy covers only information and data that is collected through this Site and no other web sites that may be linked to or from this Site; nor does this Policy apply to practices of companies that we do not control or to people we do not employ or manage.

By submitting your information via the Site, you expressly consent to our collection, storage, use and disclosure of your personal information and non-personal information as described in this Policy and to all other terms herein.

It may be possible for you to browse certain parts of the Site without telling us who you are or revealing any information that enables us to directly identify you as an individual. However, you may lose anonymity once you give us personal information about you, and by doing so, you agree to the collection, transfer and storage of that information to our servers and to the terms of this Policy.

B. Information Collected

This section details the personal and other information about you or arising from your activities on the Site as may be collected and stored by us.

As used in this Policy, “Personal Data” means any information (either alone or in combination with other information we hold) that specifically identifies you as an individual.

As well as Personal Data, we also collect some information that is not personally identifying, including aggregate or anonymized information (“Nonpersonal Data”; together with Personal Data, collectively “Information”).

Personal Data

When you request to be added to the subscription list, or when you contact us via the contact page on the Site, we collect the following Personal Data, but only to the extent you have volunteered to disclose any of the following to us in order to contact us and/or subscribe to Site content:

- first and/or last name
- email address
- any Personal Data you volunteer to reveal in any communications you have with us

Nonpersonal Data

When you use the Site, we may automatically collect Nonpersonal Data. This Policy does not restrict or limit our collection, disclosure and use of Nonpersonal Data.

Excluded Data

We do not solicit and do not knowingly collect sensitive or special category data from you, including data related to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, or sexuality; or genetic or biometric data; or data related to criminal convictions or offenses.

Legal Bases for Collection

We collect and use Personal Data only if supported by a lawful basis. Lawful bases include: (i) consent (if given by you including by your choice to submit such Personal Data, which you are free to withdraw at any time); and (ii) our legitimate interests, including for direct marketing purposes (of which you may opt-out or object), to perform, maintain and improve the Site, and as further set forth in section C, below.

Retention

We retain Personal Data from closed accounts, if, for as long as, and to the fullest extent, permitted by applicable law, including in order to comply with law, prevent fraud, resolve disputes, troubleshoot problems, assist with any investigations, enforce our agreements and policies, and take other actions otherwise permitted by law or as specified elsewhere in this Policy.

C. Our Use of Information

We may use your Personal Data to:

- (i) fulfill the purposes disclosed when you provided your information to us;
- (ii) resolve disputes and troubleshoot problems;
- (iii) prevent potentially prohibited or illegal activities;
- (iv) provide, customize, measure, and improve our services, benefits and the Site's functionality, content and layout;
- (v) provide you with personalized content and offerings;
- (vi) tell you about targeted marketing, service updates, and promotional offers including based on your communication preferences; and
- (vii) compare information for accuracy, and verify it with third parties.

Further, we may disclose Personal Data to respond to legal requirements, in connection with a merger, sale of assets, or other similar corporate transactions, respond to claims that a listing or other content violates the rights of others, or protect the rights, property, or safety of any person.

D. Sharing Information

We may also share Personal Data with:

- (i) service providers, consultants or similar contractors or agents to support or enhance the Site or our business operations;

- (ii) law enforcement or other governmental officials, in response to a verified request relating to a criminal investigation or alleged illegal activity, or to respond to any legal process;
- (iii) persons as we in our sole discretion believe necessary or appropriate in connection with an investigation of fraud, intellectual property infringement, piracy, or other unlawful activity;
- (iv) anyone in an aggregated and/or anonymized form which cannot reasonably be used to identify you, and
- (v) other business entities, should we plan to merge with, or be acquired by such entities.

E. Cookie Policy

We do not set cookies of any kind and we have no intention or desire to do so.

F. Your Rights and Choices

You have the right to request that we not process your Personal Data for marketing or promotional purposes. You may also opt-out of receiving promotional emails from us by following the instructions in the emails or via email sent to info@spiideo.com. If you opt-out, we may still send you non-promotional emails, such as emails about your accounts or our ongoing business relations.

Rights to Review, Rectify, Erasure, and Portability

You can review and change your Personal Data at any time by contacting us. If at any time you wish to request access to, or deletion or modification of, any Personal Data that we have about you, contact us directly via email to info@spiideo.com. We endeavor to provide such data in a portable, structured, commonly-used, and machine-readable format.

Upon receipt and process of a reasonable request, we will, within a commercially reasonable period of time, comply with such request to the extent technically and commercially feasible.

Right to Object

You may exercise your right to object, if no opt-out mechanism is otherwise made available to you (including objecting to the basis of use for the purpose of our legitimate interest), by sending an email to info@spiideo.com.

G. Applicability

Except as otherwise expressly included in this Policy, this document addresses only the use and disclosure of information we collect from you. If you disclose your information to others, whether they are users on the Site or other sites throughout the internet, different rules may apply.

H. Children

The Site is not directed to persons under sixteen years of age, and we do not knowingly collect personal information from such children. If you are younger than sixteen, please do not provide any personal information to us. If a person sixteen years of age or younger has provided personal information to us, a parent or guardian of such person should contact us at info@spiideo.com so that we can remove such personal information from our database.

I. Jurisdiction

We are located in Sweden, as are the computers that make the Site available. All matters relating to privacy issues are governed by the laws of Sweden. Nothing in this Policy will be construed as an admission or implication that we are subject to the laws or jurisdictions of any national or international jurisdiction or governmental entity.

J. Data Security

Please remember that any messages you send over the internet are not secure unless they are appropriately encrypted. Despite best efforts, third parties may unlawfully intercept or access transmissions or private communications, and other users may abuse or misuse your personal information that they collect from the Site.

K. Policy Changes

We may amend this Policy from time to time. If we make any changes to this Policy, we will post the amended terms here and change the "Last Revised" date above.

L. Questions or Complaints

If you have any questions about this Policy, please contact us at info@spiideo.com. You have the right to lodge complaints with your applicable local data protection authority, but we hope that you will try to work things out with us first.

M. Contact Information

Questions or comments regarding this policy should be submitted to the Spiideo Privacy Office, Lilla Torg 1, 211 34 Malmö, Sweden, or via e-mail to info@spiideo.com.

CALIFORNIA PRIVACY RIGHTS

A. *"Do Not Track" under the California Online Privacy Protection Act.* We do not engage in the collection of personally identifiable information from users across third party sites or applications. We are not aware of any processes for others collecting personal information about your activities on the Site over time and across third party websites, apps, or other online services; nor do we knowingly collect information about your activities over time across third party sites and services.

B. *California's "Shine the Light" law (Civil Code Section § 1798.83).* This law permits users of the Site that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to us at info@spiideo.com.

C. *California Consumer Privacy Act (CCPA).* We are not a "business" as that term is defined in the CCPA, and therefore are not subject to the CCPA.