

CARE OF CARL

Messenger brand experience privacy policy

We, Care of Carl AB (hereinafter “we” or “Care of Carl”), appreciate your participation and your interest in our company and products. The protection of your privacy when processing your information is very important to us. We take the protection of your personal data very seriously and will treat this with the strictest confidentiality. The collection and use of your personal data is carried out solely in accordance with the legal provisions of the EU data protection law. This privacy policy is intended to provide you with information regarding when we store which data and how we use it. Information regarding the processing of data in conjunction with the products and services available from our other companies can be found in the respective privacy policy of these companies.

1. Data controller and data protection officer; contact

Should you have any questions or remarks regarding privacy, please do not hesitate to contact us by e-mail at the address info@careofcarl.com or the data protection officer at either the above e-mail address or in writing at the following address:

Care of Carl AB
Fabriksgatan 11
503 38 Borås
Sverige

2. Subject of data protection

Personal data is subject to data protection. This refers to all information that relates to an identified or identifiable individual (so-called affected individual). This includes, for example, information such as name, postal address, e-mail address or telephone number, but also information necessarily arising while using Care of Carl's infrastructure, such as information regarding the start, end and extent of the use of our online services.

3. Use of the chatbot

3.1 Collection and processing of personal data

For participation in the Messenger brand experience, we use a chatbot that can be accessed via Facebook Messenger. The provider of this service is:

Dialogtrail AB
Stena Center 1
412 92 Gothenburg
Sweden

For the use of this, Dialogtrail AB operates an automatic procedure which allows users to access information tailored to them based on their entries. Personal data is only collected, processed and used for the purpose of service provision. It is not necessary for you to inform Dialogtrail AB of your personal details merely in order to use the chatbot within Facebook Messenger. These will only be transmitted after using the experience on Messenger.

The following personal data is collected, processed and transmitted to us by Dialogtrail AB after a button on Facebook Messenger is clicked:

- Name (first name and surname)
- Gender
- Contact details
- Facebook language settings
- Chatbot interactions

For further information on the use of the chatbot, as well as the purpose and extent of the collection of your data by Dialogtrail AB, please read the privacy policy under the following link:

https://dialogtrail.com/Dialogtrail_Privacy_Policy_2019_09.pdf

3.2 Messaging services

The chatbot is accessed via the 'Facebook Messenger' messaging service. The provider of this service is:

Facebook Ireland Limited
4 Grand Canal Square
Dublin 2
Ireland

The purpose and extent of data collection by Facebook and the local processing and use of your data can be found in Facebook's privacy policy, which can be viewed at the following link:

<https://www.facebook.com/privacy/explanation>

3.3. Third parties

We have engaged third parties to create the Facebook Messenger experience. Data is only collected by third parties if this is required in order to perform the task or process your request, if further legal permission exists or if we have your consent to do this.

Occasionally, we engage contractually bound Care of Carl's companies and external providers for the provision of services, for example in the areas of technical infrastructure and maintenance for our services, the provision of content and transmission of advertising activities (only if you have given explicit prior consent for this). In such cases, information is divulged to these companies or individuals so as to allow them to continue processing these. These external providers are carefully selected by us and regularly audited to ensure that your right to privacy is protected. The providers may use the data solely for the purposes specified by us.

Should individual functions within Care of Carl's infrastructure be fulfilled on our behalf by providers whose headquarters or data processing location is not domiciled in an EU member state or another signatory state of the Agreement on the European Economic Area, we shall ensure before divulging any data that an appropriate level of data security is in place at the receiver's premises (e.g. via a suitability decision by the European Commission, appropriate guarantees such as the receiver's self-certification for the EU-US Privacy Shield or agreement of so-called EU standard contractual clauses with the receiver) and/or that we have received appropriate consent from you.

You can receive an overview of the receivers in non-member countries and a copy of the precise arrangements agreed from in order to guarantee an appropriate level of data protection. Please use the information under Section 1 for this.

4. Rights of the affected individual

Numerous rights are available to you as an individual affected by data processing. Specifically:

Right to information: you have the right to receive information on the data we are storing regarding you.

Right to modify and delete data: you can request that we modify incorrect data and - if legal requirements are met - that we supplement or delete your data. If legal retention requirements prevent the deletion of data, the processing of said data will be limited (see below).

Limitation of processing: you can - if legal requirements are met - request that we limit the processing of your data.

Objection to data processing on the legal basis 'legitimate interest': you have the right to object to us processing your data at any time, provided that this is based on the legal basis 'legitimate interest'. The legal basis 'legitimate interest' only exists if processing is required for the protection of the legitimate interests of the controller or a third party, unless outweighed by the interests or fundamental rights and freedoms of the affected individual requiring the protection of personal data, in particular if the affected individual is a child. Ensuring the technical operation of the website or preventing fraud can, in certain cases, be deemed to be legitimate interests. If you make use of your right of objection, we will cease the processing of your data, unless we can - in accordance with legal requirements - prove compelling legitimate grounds for continued processing which outweigh your rights. You can also raise an objection to the processing of your personal data for advertising purposes at any time ('advertising objection').

Withdrawal of consent: if you have consented to us processing your data, you can withdraw this at time with effect on any future processing. The legality of the processing of your data up to the point consent was withdrawn remains unaffected.

Right of appeal to supervisory authorities: you can also submit an appeal to the competent supervisory authorities if you believe that the processing of your data violates applicable laws. In order to do this, you can contact the data protection authority with jurisdiction over your place of residence or state, or the data protection authority with jurisdiction over us.

Furthermore, you can contact us free of charge should you have any questions regarding the collection and/or processing of your personal data, your rights as an affected individual and any consent you may have given. To exercise any of the previously mentioned rights, please contact info@careofcarl.com or contact by post at the address given in Section 1. In doing so, please ensure that it is possible to clearly identify you.

5. Data security

We use state-of-the-art technology to provide for all required technical and administrative measures in order to ensure an adequate level of protection corresponding to the risk in accordance with the applicable legal requirements.

6. Updates to this privacy policy

We reserve the right to modify this privacy policy. We therefore request that you regularly check this privacy policy to ensure you are aware of any updates.