

Ciptor Sweden AB and Ciptor America Inc, Privacy Policy

Effective as from: 2018-01-01

Last update: July 20, 2026

In the course of our business, we, Ciptor Sweden AB, reg. no. 556819-5985, ("Ciptor") and the office companies Ciptor America Inc, Tax ID 83-2388188, may process personal data relating to you.

This privacy notice has been adopted by Ciptor Sweden AB and applies to our and/or other companies in the Ciptor group (together "Ciptor") processing of personal data relating to you as a (i) visitor of our websites or social media profiles/pages, (ii) customer buying our products online or such a potential customer, and (iii) registered user of our services and products.

1. Introduction

Your privacy is important to us, and we strive for a high level of protection in all processing of personal data. Within the EU/EEA, the General Data Protection Regulation (GDPR) applies. In the United States, we comply with applicable state laws, including the Florida Digital Bill of Rights (FDBR) and the California Privacy Rights Act (CPRA).

In accordance with applicable data protection legislation, Ciptor Sweden AB, or the Ciptor Group company otherwise specified at the end of this Privacy Notice, is the data controller and responsible for the processing of your personal data as set out below.

2. Processing of Personal Data

2.1 General

The term 'personal data' refers to such information which, directly or indirectly, may refer to you as an individual (e.g., name, email address, IP address, and user behavior). Personal data processing refers to any action we or a third party take with the data.

- **Sensitive Data & Minors:** We do not collect "Sensitive Personal Data" (such as biometrics, precise geolocation, or health data) without your explicit, affirmative consent. Furthermore, in compliance with 2026 US state regulations, data from consumers under the age of 16 is treated automatically as sensitive data and requires verifiable parental consent to process.
- **Artificial Intelligence (AI):** In accordance with the EU AI Act and state AI regulations taking effect in 2026, we maintain strict transparency. If we utilize AI for automated decision-making or chatbots, you have the right to know you are interacting with an AI and the right to object to automated profiling.

2.2 Websites, Social Media, and Cookies

We collect personal data you voluntarily provide (e.g., signing up for newsletters). We also automatically receive information from your browser to log files on our server.

- **2026 Cookie Policy Update:** You will be provided with a single-click option to accept or refuse all non-essential cookies. If you choose to refuse, your

preference will be respected and saved for at least six months without prompting you again.

- **Legal Ground:** Performance of a contract and legitimate interest. Where consent is required, we obtain it before processing.

2.3 Customers buying our products online or potential customers

When you buy or inquire about products online, we process information you volunteer (name, delivery address, payment information).

- **Data Minimization & Retention:** We delete collected personal data when the processing purpose is completed. To comply with modern data lifecycle management laws, **personal data is systematically deleted within two (2) years of your last interaction** with us, unless longer retention is strictly required by applicable bookkeeping/tax legislation.

2.4 Registered users of our services and products

We collect necessary details to provide you with services/products and handle support cases. Legal ground is the performance of a contract and legitimate interest.

3. Security for the Protection of Personal Data

We protect your personal data against unauthorized or unlawful processing, loss, destruction, or damage by implementing appropriate technical and organizational security measures, including privacy-by-design architecture and regular cybersecurity risk assessments.

4. Restrictions on the Disclosure of Personal Data

We may appoint external partners (IT services, marketing) who act as data processors. Companies processing data on our behalf must sign an agreement ensuring a high level of protection.

- For partners outside the EU/EEA, we rely on standardized model clauses for data transfers adopted by the EU Commission.
- **Sale of Data:** Ciptor does not sell your personal data. If our policy changes to include the sale or sharing of data for targeted advertising, we will notify you and provide a clear, accessible mechanism to opt out.

5. Your Rights and the Right to File a Complaint

Under the GDPR and 2026 US state privacy laws (including the FDBR), you have comprehensive rights over your data. We will respond to all verifiable consumer requests within **45 days** (with a possible 15-day extension if necessary). Your rights include:

- **Right to Access & Portability:** Request a copy of the personal data we process about you.
- **Right to Correction:** Have erroneous data corrected.
- **Right to Erasure (Deletion):** Request that we delete your personal data (a priority enforcement right under the GDPR).
- **Right to Opt-Out:** You may opt out of targeted advertising, the sale of personal data, and any profiling activities.
- **Right to Restrict Processing:** Withdraw consent to particular processing at any time.

You are entitled to file a complaint with the relevant supervisory authority (e.g., the Swedish Authority for Privacy Protection (IMY)) if you consider your data has been processed unlawfully.

6. Data Controller and Contact Details

Data Controller

- **Websites/Social Media:** The Ciptor Group company providing the site/service.
- **Online Customers & Registered Users:** The Ciptor Group company entering into the agreement or providing the service.

Contact Details

If you have any questions about this policy, or want to exercise your rights, please contact us:

- **Email:** privacy@ciptor.com
- **Sweden Office:** Ciptor Sweden AB, Kungsposten 4A, 427 50 Billdal, Sweden
- **US Office:** Ciptor America Inc, 2700 Glades Circle Suite 125, Weston, Florida 33327, United States

For US/Florida Consumers: If you are a consumer in Florida or other US states with comprehensive privacy laws and would like to exercise your rights under the Florida Digital Bill of Rights (FDBR) or CCPA, you may contact us by email at privacy@ciptor.com. You will not be discriminated against for exercising your privacy rights.

7. External Links

Our websites may contain links to external websites. If you follow a link, you are encouraged to review their privacy policies.

8. Changes to the Privacy Notice

Occasionally we may make changes to this Privacy Notice to reflect changing global regulations. We will make new versions available on our website and update the "Last update" date at the top of this document.

[1] This policy does not relate to our processing of personal data relating to our staff.