Ciptor's Privacy Policy

Effective as from 2018-01-01 Last update 2020-11-01

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 to (iii) registered user of our services and products.

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 from 25 May 2018.

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. If you have any questions about this information, or if you wish to exercise any of your rights as set out below, contact Ciptor via the contact information listed under Section 6 below.

Processing of Personal Data

General

The term 'personal data' refers to such information which, directly or indirectly, may refer to you as an individual. Examples of such data are name, email address, government issued identification number, billing information, contact details, IP address and user behaviour. Personal data processing refers to any action that we or a third party that we have engaged take with the personal data, such as collection, registration and storage. See also our Cookie Notice.

Personal data may only be processed for specified and explicitly stated purposes and may not be subsequently processed for any purpose that goes beyond these stated purposes. Websites and Social Media

We collect personal data such as name, e-mail address and other information which you voluntarily provide, e.g. when you choose to interact with Ciptor by signing up for updates such as newsletters, deals and offers, product information, webinars, trade shows, events etc. through email (which you can opt-out from via a link in each message sent through email). We also automatically receive and store information from your web browser, such as IP address, language preferences cookie information and the pages you visit, to log files on our server. We use the information collected to respond to your requests regarding products and services, to improve the content on our websites and the services, to track and prevent abuse of our websites and services, and to develop anonymous usage statistics.

We also use personal data for direct marketing and advertising in accordance with applicable law and market practice. We use the information we collect with regard to how you, as a user, use the websites so that we can analyse search and usage behaviour and be able to provide you with personalised content. Personal data may also be processed indirectly in connection with the development and administration of Ciptor's's IT systems.

Legal ground: (i) performance of a contract where you request services/resources through the websites and (ii) legitimate interest for other processing activities, such as for the purpose of improving services and the content of the websites as well as for prevention of abuse and statistical purposes. In case your consent is required for any of the above purposes, we will obtain such consent before we process your personal data for such purpose (if you withdraw the consent, that will not affect the lawfulness of processing based on consent before its withdrawal). See also our Cookie Notice.

We delete collected personal data when the purpose of the processing has been completed. Our Cookie Notice includes retention periods in respect of cookies that we use.

Customer buying our products online or such potential customers

When you are a customer buying products online, or a potential customer inquiring about our products and services, we may process information you have volunteered, such as name, home and/or delivery address, telephone number, e-mail address, payment information, historical order information and product you bought. When you buy, or inquire about, our products online via our Website, we also collect the information specified in Section 2.2.

Legal ground: (i) performance of a contract and legal obligation where you have bought a product online and (ii) legitimate interest for other processing activities, such as for the purpose of improving services and the content of the websites as well as for statistical purposes. In case your consent is required for any of the above purposes, we will obtain such consent before we process your personal data for such purpose (if you withdraw the consent, that will not affect the lawfulness of processing based on consent before its withdrawal). See also our Cookie Notice.

We delete collected personal data when the purpose of the processing has been completed. Some of this information is retained for the duration required by applicable bookkeeping legislation.

Registered users of our services and products

We collect personal data such as name, address, phone number, e-mail address, payment information, designation and other information which you voluntarily provide. When you use our services via our Website, we also collect the information specified in Section 2.2. We use the information collected to provide you with the services/products, to respond to your requests and handle support cases regarding products and services, to improve the support/services and to develop anonymous usage statistics.

Legal ground: (i) performance of a contract where you request services/resources through the website and (ii) legitimate interest for other processing activities, such as for the purpose of improving the services, support and content of the websites as well as for statistical purposes. In case your consent is required for any of the above purposes, we will obtain such consent before we process your personal data for such purpose (if you withdraw the consent, that will not affect the lawfulness of processing based on consent before its withdrawal). See also our Cookie Notice.

We delete collected personal data when the purpose of the processing has been completed. Security for the protection of personal data

We protect your personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage, by implementing appropriate technical and organizational security measures.

Restrictions on the Disclosure of Personal Data

We may appoint external partners to perform tasks on our behalf, such as providing IT services or helping with marketing and recruitment, administration of press releases, sales activities, data analysis or statistics. We may also use personal information to have our distributors, resellers or partners notify or contact you about our products or services. The performance of these services may mean that our partners, both within and outside the EU/EEA, are able to gain access to your personal data. Companies that process personal data on our behalf must always sign an agreement with us so that we are able to ensure a high level of protection of your personal data even with our partners.

Special safeguards are taken with regard to partners outside the EU/EEA, such as signing agreements that include the standardized model clauses for data transfers adopted by the EU Commission and which are available on the EU Commission's website.

We may also disclose your personal data to third parties, for example the police or other public authorities, if it concerns criminal investigations or if we are otherwise required to disclose such data by law or public authority decision. We will not disclose your personal data to any extent other than described in this section.

Your Rights and the Right to File a Complaint

Under applicable data protection legislation you are entitled, at any time, to request access to the personal data that is processed about you, to have erroneous personal data corrected, to request that we shall stop processing and delete your personal data, to request that the processing of your personal data is restricted, to exercise your right to data portability, to withdraw consent to particular processing (where such consent has been obtained) and to object to the processing of your personal data. In such event, contact Ciptor via the contact details listed below. You are also entitled, at any time, to file a complaint with the relevant supervisory authority, the Swedish Data Protection Authority, if you consider that your personal data has been processed in contravention of applicable data protection legislation.

Data Controller and Contact Details

Data Controller

Below we indicate which Ciptor company that is the data controller in respect of the different processing activities covered by this Privacy Notice:

Websites and social media: The Ciptor Group company that provides the specific website, social media profile/page or the service is the data controller. Where applicable, other legal entities within the Ciptor group may furthermore be data controllers for personal data processing in accordance with the terms of the respective service or function.

Customers buying our products online: The Ciptor Group company that has entered into an agreement with the customer buying a product online is the data controller.

Registered users of our services and products: The Ciptor Group company that provides the specific service and products is the data controller.

Contact Details

If you have any questions on how we process your personal data or want information about further contact details for the data controllers above, please contact us through our website or post.

Contact us at privacy@ciptor.com or at address Ciptor Sweden AB, Kungsporten 4A, 427 50 Billdal, Ciptor America Inc, 2700 Glades Circle Suite 125, Weston, Florida 33327 United States, if you have questions about this policy or our processing of personal data, or otherwise want to exercise any of your rights related to our personal data processing.

If you are a consumer in Florida, USA, and would like to make a request concerning your rights under the Florida Consumer Privacy Act you may also contact us by email at privacy@ciptor.com.

External Links

Our websites may sometimes contain links to external websites or services that we do not control. If you follow a link to an external website, you are encouraged to review the principles for processing of personal data and information about cookies that apply to the website or service in question.

Changes to the Privacy Notice

Occasionally we may, in our discretion, make changes to this Privacy Notice e.g. by making new versions available on our website or provide you with prominent notice as appropriate under the circumstances. You are encouraged to therefore visit our website from time to time to learn of any updates and make sure you read any such notice carefully.

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