

RAM ONE AB

## PRIVACY POLICY

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Adopted by the Board of RAM ONE at the Board meeting held on 5th March 2018

## **1 RESPONSIBILITY FOR PERSONAL DATA**

RAM ONE AB (“the Company”), corporate identity number 556629-1950, Jakobsbergsgatan 13, 111 44 Stockholm, has responsibility for the processing of personal data on this website. The Company’s processing of personal data complies with the General Data Protection Regulation (EU) 2016/679 (“GDPR”).

## **2 PURPOSE OF PRECESSING**

The Company processes personal data when this is necessary for a performance in accordance with an agreement with the registered person. Moreover the Company also processes personal data with the object of carrying out transactions and preventing fraud and similar criminal acts. Providing the Company with personal data is therefore a precondition for entering into a contractual relationship with the Company. The Company cannot provide its services without processing personal data.

The Company also processes personal data in order to fulfil legal obligations, for example in accordance with the Act (2009:62) on Measures to prevent Money Laundering and the Financing of Terrorism (money laundering law) and the Act (2010:751) on Payment Services (payments law). The Company is required to keep written records of its activities in accordance with EU rules regulating financial markets, among them MiFID II.

In exceptional cases the Company processes contact data for marketing purposes and to maintain contact. Such data belong to persons within potential partner organisations and other organisations that are judged to have an interest in being contacted by the Company.

## **3 PROCCESING**

The Company gathers the following types of personal data within the framework of its business:

- Personal name and surname,
- Email address,
- civil registration number,
- address and other contact information,
- information regarding bank account number and other financial information, and
- IP number from buyers and sellers in connection with their use of the Company’s services.

The information is used by the Company for invoicing, information and delivery of product and performance of services, for contacts with existing customers and as a basis for statistics and product development.

Personal data can be disclosed to the Company's partners and to payment providers in order to make possible the completion of each contract. Personal data are disclosed to government authorities only when this is required by law or the decision of a public authority.

Personal data that the Company processes are gathered mainly from persons in the register. When necessary, in order to fulfil contracts, for example with registered persons or to satisfy legal requirements, supplementary information may be obtained from public authorities, open sources or other organisations.

#### **4            MARKETING**

The company's customers and registered users can give their consent to being contacted for marketing via post, telephone or email and sms (text) and other digital channels. Marketing via email and sms is regulated in the Marketing Act; for example customers shall be given information about who to contact if they no longer wish to receive marketing information.

#### **5            RETENTION OF PERSONAL DATA**

Personal data are saved for the period during which the customer and the Company have an active contractual relationship and for a period thereafter, or as specifically agreed. The consent is valid until the user himself recalls it and does not lapse if the service is not used. Nor is the consent dependent on purchases, if any, of the products.

The Company saves the users' personal data for bookkeeping purposes for seven years in accordance with the requirements of the Bookkeeping Act. The Company also complies with the documentation requirements made on the securities market in MiFID II. Certain personal data relating to commercial events are saved for at least five years in accordance with regulations.

Information regarding a contact person in the Company's partner organisations is saved by the Company for so long as the person is employed and the companies have contact, or the contact person asks to have it deleted.

#### **6            DELETION/DEPERSONIFICATION OF PERSONAL DATA**

Personal data are deleted or depersonified when the information no longer needs to be retained for the purposes they were originally saved. Depersonification means that the data

can no longer be used to identify a person. Personal data that relate to user accounts that are still active or have balances are exempted from this main rule.

The use of personal data during the period they are saved is restricted by the purposes of the processing. Personal data that have been deleted or depersonified cannot be re-entered or recreated and once the process has been completed no individual can any longer be associated with the user account.

## **7 IT SECURITY**

Having responsibility for personal data, the Company takes suitable technical and organisational measures to protect the personal data that are processed pursuant to Section 2 in the EU's the general data protection regulation (GDPR). The Company has drawn up a special policy for handling IT security.

The Company's measures for maintaining IT security also include complying with obligations pursuant to the rules regulating the financial market.

## **8 YOUR RIGHTS**

The Company has appointed a Head of Administration with responsibility for personal data.

Any individual who is registered with the Company is entitled to withdraw their consent free of charge without this affecting the legality of any processing prior to withdrawal. A registered person is also entitled to request that the processing be limited to storage and to object to the processing when the Company processes the data for marketing.

A registered person is also entitled to request that they be sent an extract from the register, either in electronic form or as hard copy, and that their personal data be corrected or deleted.

If we process your personal data either on the basis of your consent or in accordance with an agreement with you, you are entitled to receive a copy of the personal data you have provided us with and transferred to another person with responsibility for personal data (known as data portability). Data portability is conditional on the transfer being technical possible and capable of automated performance.

Registered persons are always entitled to submit complaints to the Integrity Protection Authority.

If you wish to be sent an abstract from the register, recall your consent or correct/delete an item of data please contact the Company's officer with responsibility for personal data who can be reached at +46 8 508 918 72 or [johanna.stromqvist@ram.se](mailto:johanna.stromqvist@ram.se).