

Privacy Policy

Last updated: January 16, 2023

At Plegium, we are in favor of the increasing scrutiny on how companies are handling personal data. We think it's important to handle personal data only when needed to be able to deliver our products and services. You should feel safe submitting your data to us. With this Privacy Policy, we describe how we ensure that your personal data is handled in accordance with the EU Data Protection Regulation 2016/679 / EC (known also as "GDPR") and other privacy regulations.

By using Plegium's products and services, you accept this Privacy Policy and our processing of your personal data. It is therefore important that you read and understand this privacy policy before using our services.

In cases where you decline to share personal information with us, certain of our services may be limited or not available at all.

These are the contents of this privacy policy:

1. **General**
2. **Personal Data Controller**
3. **Which Personal Data is Stored, and on What Grounds?**
4. **Cookies**
5. **Storage Time**
6. **The protection and sharing of your personal data**
7. **Your Rights**

1. General

This privacy policy describes how Plegium (also called "Company" and "we" below) processes personal information about you when you use our products and services. This privacy policy also describes your rights and how you can exercise your rights towards us.

Plegium has the right to change this privacy policy at any time. If this happens, we will publish the updated privacy policy on our website together with information about when the changes will take effect.

2. Personal Data Controller

Plegium AB, which is a Swedish company (company registration number 559082-0410), is responsible for the processing of your personal data and is thus responsible for ensuring that your data is handled in a correct and secure manner in accordance with applicable legislation.

If you have questions about how we handle your personal data or if you want to exercise your rights, the easiest way to contact us is via e-mail at contact@plegium.com.

3. Which Personal Data is Handled, and on What Grounds

We aim to save and handle as little personal data as possible. We do need to collect and handle certain personal data in order for our products and services to work. The following personal data may be collected from you when you use our products and services.

Data Handler	Data Handled	Purpose	Legal basis
The Plegium app	Location information (GPS coordinates) from your mobile device	To be able to include it in the text messages sent to your own personal emergency contacts when you activate your Plegium device. If you are an end user in any of our services (e.g. our business solution) where an administrator (e.g. your boss) can define additional emergency contacts (e.g. your colleagues, your boss, the security officer of your company etc), your location will be included in the text messages sent also to those additional emergency contacts.	Consent
The Plegium app	Your name	To be able to put it into the text messages sent and phone calls made when you activate your Plegium device	Consent
The Plegium app	Your email address	To be able to reach you in urgent matters	Consent
The Plegium app	Your phone number	In case you sign up for any of the premium services from Plegium where an alarm is sent to a professional monitoring desk, the monitoring desk must be able to call you to verify the alarm is real before calling first responders	Performance of a Contract
The Plegium app	Names and phone numbers to the emergency contacts you enter into the Plegium app	To be able to send text messages and phone calls to your emergency contacts when you activate your Plegium device	Consent
The Plegium app	Audio data	In case you use any of our services that include a live audio stream and activate you Plegium device, the Plegium app will start the microphone on your phone and stream audio to your emergency contacts. If you are an end user in any of our services (e.g. our business solution) where an administrator (e.g. your boss) can define additional emergency contacts (e.g. your colleagues, your boss, the security officer of your company etc), the audio will also be streamed to those additional emergency contacts. If you have a service where a monitoring company is notified when you activate your Plegium device, the monitoring company may also receive the audio stream.	Consent
The Plegium app	Your Google Play / App Store billing information	In case you sign up for any of our premium services (for example professional monitoring), we need access to your Google Play / App Store billing information to be able to charge you for these services	Performance of a Contract
The Plegium app	App usage data and crash information	To be able to improve the Plegium app	Legitimate Interest
The Plegium websites	Your name, address, phone number, email address, payment information	In case you make a purchase on any of Plegium's websites, we need collect the personal data that you provide to us in conjunction with the purchase, in order to be able to deliver the products and services you have purchased	Performance of a Contract
The Plegium websites	Your name, email address and the contents of the message you send to us	In case you send a message to us via a contact form on any of our websites or in any other way contact us, we handle the personal data the you provide to us to be able to handle your inquiry	Legitimate Interest

In addition to above, we use so-called cookies on our websites to customize the user experience and improve the websites. Cookies are small text files that are stored on your computer and that can be used to, for example, follow what you do on our websites.

For more information about our use of cookies, please refer to our Cookie Policy, which can be found on our website: <https://www.plegium.com/CookiePolicy>

4. Storage Time

Plegium stores personal data for as long as it is necessary to fulfill the purposes for which the data was collected or as long as the company is obliged to store personal data in accordance with law.

We save the personal data that you provide to us through the Plegium app until you delete the app.

If you make a purchase from us or send an email to us, we save the personal data you have provided to us until you actively ask us to delete it. We do this to be able to handle returns or other questions regarding your order, or to be able to follow up on previous conversations that we have had with you.

5. The protection and sharing of your personal data

In order for you to feel safe when you submit your personal data to us, we have taken the necessary security measures to protect your personal data against unauthorized access, alteration and deletion.

Plegium may share personal data with third parties in cases where you have consented to it, or if there is another legal basis for such handling. An example of when we share your personal data with third parties is when you make a purchase from us, in which case we share your name, address and other data to the shipping company (for example Fedex or DHL) that fulfills your order.

In cases where we share your personal data to third parties, we always take the necessary measures to ensure that your information is handled securely.

We always strive to process and store your personal data within the EU / EEA. The user should be aware that rules outside the EU / EEA may mean less protection for your personal data. Should your personal data need to be transferred and stored outside the EU / EEA, Plegium chooses suppliers with the utmost care and with regard to your privacy.

6. Your Rights

6.1 Free Register Extract

Provided that Plegium is responsible for your personal data, you have the right to, at any time, obtain a free register extract from us showing what information about you that we have stored, the purposes of handling personal data, information about where this personal data was obtained from, and in applicable cases to whom the information has been or will be disclosed. You also have the right to receive information about the predicted period during which the data will be stored, or the criteria used to determine this period. You also have the right to find out about the existence of automated decision-making (including

profiling). The request for access to such information must be in writing and sent to Plegium at the email address given in section 2. Personal Data Controller.

6.2 Data Portability

You have the right to data portability, i.e. a right to, under certain conditions, obtain and transfer your personal data in a structured, generally used and machine-readable format to another personal data controller.

6.3 Correct and Delete

Plegium will, at your request or on its own initiative, correct, deidentify, supplement or delete information that is found to be incorrect, incomplete or misleading. We are in some cases obliged to process your personal data even though you have requested that these be removed, for example in the right to freedom of expression and information, in order to fulfill a legal obligation or to perform a task of public interest.

6.4 Restrict Usage

In some cases, you have the right to demand that the processing of personal data be restricted. Restriction means that the information is marked so that in the future it may only be processed for certain limited purposes.

6.5 Withdraw Consent

In cases where you have previously given consent to the processing of your personal data, you have the right to revoke that consent.

6.6 Automatic Decision Making

You have the right to object to treatment based solely on automated decision-making (which includes profiling), when that decision-making has a legal effect on you or otherwise significantly affects you. We do not engage in fully automated decision-making that has a legal or otherwise significant effect using customer data.

6.7 Exercise Rights, Ask Questions or Make Complaints

If you wish to exercise any of the above rights, if you have any questions regarding personal data held by the Plegium, if you have questions about this privacy policy or if you are dissatisfied with our processing of your personal data, please do not hesitate to contact us via the email address given in section 2. Personal Data Controller.

You also have the right to submit a complaint to your local privacy protection authority.