

EasyPark's Privacy Policy

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1 About EasyPark's Privacy Policy

EasyPark conducts business in several countries. In this privacy policy (the “**Privacy Policy**”), “**EasyPark**”, “**we**” and “**us**” refer to the local group company which provides EasyPark's services (the “**Services**”).

In this Privacy Policy, it is explained which categories of personal data EasyPark collects, why EasyPark collects such data, and what EasyPark uses the personal data for in connection with the Services, EasyPark's mobile application (the “**Application**”) or EasyPark's website (the “**Website**”). This in order for you to be able to exercise your rights.

EasyPark processes and handles personal data in accordance with applicable data protection law. EasyPark is the data controller for the processing of your personal data unless otherwise is stated in this Privacy Policy.

Personal data is all such information which may be used to identify a specific individual (a natural person).

2 When Does EasyPark Collect Information?

2.1 You

The personal data which may be processed consists primarily of such data which you, directly or indirectly, provide to EasyPark. EasyPark collects your personal data for example when you:

- apply for registration of an account with EasyPark,
- use the Services, the Application and the Website, and when you
- contact EasyPark.

2.2 Information Service Provider

We may also collect personal data from information service providers in order to cross-check our customers register with public registers to ensure that we have updated and correct information. The data we collect from

the public registers are also used by us in connection with communication and offers sent to you.

2.3 Credit Reporting Agencies

If you apply to pay by invoice we will collect a person/credit report from credit reporting agencies.

3 Purposes of the processing of personal data

EasyPark collects your personal data for the following purposes.

3.1 Manage application for registration of account

EasyPark processes your personal data in order to manage your application regarding registration of an account with EasyPark.

Personal Data	Legal basis for the processing
Identification Data , e.g. name, customer identification number, personal identity number, mobile phone number, registration number	<i>Agreement.</i> The processing of personal data is necessary in order for EasyPark to fulfil its obligations to you in accordance with the terms of the Services. Personal identification numbers are processed in order to ensure a secure identification of you.
Contact details , e.g. address, e-mail, phone number	
Payment details , e.g. method of payment and relevant data ¹	
Storage period: Personal data is retained during such time that the application is processed.	

3.2 Provide the Services

EasyPark processes your personal data in order to provide the Services.

If you have allowed the Application to get access to location services, EasyPark will collect information about your mobile phone's geographic location for the same purpose.

If you apply to pay by invoice, we will process your personal data in order to conduct a credit assessment.

¹ EasyPark does not handle card details. Card details are handled by our PCI-certified service providers.

Personal Data	Legal basis for the processing
Identification Data , e.g. name, customer identification number, personal identity number, mobile phone number, registration number	<i>Agreement.</i> The processing of personal data is necessary in order for EasyPark to fulfil its obligations to you in accordance with the terms of the Services.
Contact details , e.g. address, e-mail, phone number	If you are paying by invoice your personal identification number is processed in order to ensure a secure identification of you.
Parking data , e.g. arrival/departure time and area code for parking	The processing of location data is based – if the processing isn't necessary for the Service in question – on your consent which you give to us by activating location data in the Application on your mobile phone. You can anytime withdraw your consent to EasyPark's collecting, using and sharing of such location data by turning off the function "allow access to location data" in your mobile phone.
Transaction data , e.g. paid parking fee and fees for the Services	
Technical data , e.g. what unit is used and a mobile phone's unique ID	
Location data , e.g. where you are during a certain time period based on your mobile phone's position, start position, chosen destination and route	
<p>Storage period: The data is processed for this purpose during the customer relationship and for a time period of 36 months or, if you are a business customer, 10 years thereafter in order to satisfy EasyPark's legitimate interest of defending, establishing or exercising any legal claims.</p> <p>When the customer relationship ends, the personal data is stored for a maximum time of 23 months thereafter in order to satisfy EasyPark's legitimate interest to fulfill the agreement with relevant parking operators.</p>	

3.3 Communication and Offers

EasyPark processes your personal data in order to communicate with you regarding the Services, and to give you offers regarding EasyPark's and EasyPark's partner's services and products. By accepting the terms and conditions for the Services, you give us your consent in accordance with the Marketing Act (2008:486) (Sw. marknadsföringslagen) to our electronic marketing of our own and our partner's products and services.

You have the right to unregister from our mailing list by notifying us. EasyPark ensure that marketing directly targeting you complies with applicable laws, regulations, codes of conduct and ethical guidelines regarding marketing.

Data	Legal basis for the processing
Identification Data , e.g. name, customer identification number, mobile phone number, registration number, IP-address	<i>Legitimate interest.</i> The processing of personal data is necessary in order to satisfy EasyPark's legitimate interest of communicating with you regarding the Services and giving you offers.
Contact details , e.g. address, e-mail, phone number	
Storage period: Personal data is retained during the customer relationship and for 12 months thereafter for the same purpose. The retention period for the IP-address is stated in our cookie policy.	

3.4 Conduct surveys

EasyPark processes your personal data in order to conduct surveys regarding EasyPark, the Application and the Services, for example by asking for feedback and reviews through the Application and by e-mail.

Data	Legal basis for the processing
Identification Data , e.g. name, customer identification number, mobile phone number, registration number	<i>Legitimate interest.</i> The processing of personal data is necessary in order to satisfy EasyPark's legitimate interest of conducting surveys.
Contact details , e.g. address, e-mail, phone number	
Communication , e.g. data regarding your questions and our answer.	
Storage period: The personal data is processed for this purpose during a period of three (3) months calculated from the time of the investigation. Reports on a general level that do not contain personal data may be retained until further notice.	

3.5 Follow-up and evaluation

EasyPark processes your personal data in order to create different reports and statistics in order to follow-up and evaluate the Services and our interactions with you.

Data	Legal basis for the processing
Identification Data , e.g. registration number	<i>Legitimate interest.</i> The processing of personal data is necessary in order to satisfy EasyPark's legitimate interest to follow-up and evaluate our Services and interactions with you.
Contact details , e.g. address, e-mail, phone number	
Parking data , e.g. arrival/departure time and area code for parking	
Technical data , e.g. what unit is used and a mobile phone's unique ID	
Usage , e.g. how you use the Application or navigates on our Website (logged-in mode included)	
Storage period: Statistics do not contain any personal data and will generally be retained until further notice.	

3.6 Handle requests

EasyPark processes personal data in order to handle your requests in different channels, e.g. when you contact EasyParks' customer service.

Customer

Data	Legal basis for the processing
Identification Data , e.g. name, customer identification number, mobile phone number, registration number	<i>Legitimate interest.</i> The processing of personal data is necessary in order to satisfy EasyPark's legitimate interest to handle your requests and provide sufficient customer service.
Contact details , e.g. address, e-mail, phone number	
Parking data , e.g. arrival/departure time and area code for parking	
Technical data , e.g. what unit is used and a mobile phone's unique ID	
Transaction data , e.g. paid parking fee and fees for the Services	
Financial information , e.g. bank account number	
Communication , e.g. data regarding your questions and our answer.	
<p>Storage period: The personal data is retained for this purpose during a period of six (6) months calculated from the time of the communication. Personal data regarding contacts with you are stored during the customer relationship and during a time period of 36 months or, if you are a business customer, 10 years thereafter in order to satisfy EasyPark's legitimate interest of defending, establishing or exercising any legal claims.</p>	

User

Data	Legal basis for the processing
Identification Data , e.g. name	<i>Legitimate interest.</i> The processing of personal data is necessary in order to satisfy EasyPark's legitimate interest to handle your requests.
Contact details , e.g. address, e-mail, phone number	
Communication , e.g. data regarding your questions and our answer.	
<p>Storage period: The personal data is retained for this purpose during a period of six (6) months calculated from the time of the communication.</p>	

3.7 Recording of phone calls

EasyPark processes personal data in connection with recording of phone calls when you contact EasyPark's customer service through phone for quality and educational purposes, and for your and our safety.

Data	Legal basis for the processing
Identification Data , e.g. name, customer identification number, mobile phone number, registration number	<i>Legitimate interest.</i> The processing of personal data is necessary in order to satisfy EasyPark's legitimate interest to record phone calls for educational and quality purposes, and for safety purposes.
Contact details , e.g. address, e-mail, phone number	
Parking data , e.g. arrival/departure time and area code for parking	
Technical data , e.g. what unit is used and a mobile phone's unique ID	
Transaction data , e.g. paid parking fee and fees for the Services	
Communication , e.g. data regarding your questions and our answer.	
Storage period: The personal data is retained for this purpose during a period of three (3) months calculated from the time of the recording.	

3.8 Fulfil legal obligations

EasyPark processes personal data in order to fulfil legal obligations relevant to EasyPark, e.g. accounting obligations.

Data	Legal basis for the processing
Identification Data , e.g. name, customer identification number, mobile phone number, registration number	<i>Legal obligation.</i> The processing of personal data is necessary in order for EasyPark to fulfil its legal obligations according to law or other regulations.
Contact details , e.g. address, e-mail, phone number	
Parking data , e.g. arrival/departure time and area code for parking	
Technical data , e.g. what unit is used and a mobile phone's unique ID	
Transaction data , e.g. paid parking fee and fees for the Services	
Communication , e.g. data regarding your questions and our answer.	
Storage period: The personal data is stored for such period as is necessary in order to comply with each legal obligation	

3.9 Establish, exercise and defend legal claims

EasyPark processes personal data in order to establish, exercise and defend legal claims, e.g. in connection with a dispute or judicial process.

Data	Legal basis for the processing
Identification Data , e.g. name, customer identification number, personal identity number, mobile phone number, registration number	<p><i>Legitimate interest.</i> The processing of personal data is necessary in order satisfy EasyPark's legitimate interest to establish, exercise and defend legal claims.</p> <p>Personal identification numbers are processed in order to ensure a secure identification of you.</p>
Contact details , e.g. address, e-mail, phone number	
Parking data , e.g. arrival/departure time and area code for parking	
Technical data , e.g. what unit is used and a mobile phone's unique ID	
Transaction data , e.g. paid parking fee and fees for the Services	
Communication , e.g. data regarding your questions and our answer.	
<p>Storage period: The personal data is retained for this purpose for as long as is needed to establish, exercise or defend the legal claim.</p>	

3.10 Maintenance, protection and development of the Services

EasyPark processes personal data in order to maintain, protect and develop the Services, the Application and Website included, e.g. to log, develop, test and improve our Services.

Data	Legal basis for the processing
Identification Data , e.g. name, customer identification number, personal identity number, mobile phone number, registration number	<i>Legitimate interest.</i> The processing of personal data is necessary in order to satisfy EasyPark's legitimate interest to maintain, protect and develop the Services.
Contact details , e.g. address, e-mail, phone number	The processing of personal identification numbers are made on the same grounds as above for each processing.
Parking data , e.g. arrival/departure time and area code for parking	
Transaction data , e.g. paid parking fee and fees for the Services	
Technical data , e.g. what unit is used and a mobile phone's unique ID	
Location data , e.g. where you are during a certain time period based on your mobile phone's position, start position, chosen destination and route	
Communication , e.g. data regarding your questions and our answer.	
Storage period: The personal data is retained for this purpose during the customer relationship and for as long as EasyPark, for the respective purpose above store your personal data. For development of the Services, personal data is only used in order to anonymize them for the purpose of using the data in EasyPark's test environment.	

4 Your rights

According to applicable data protection legislation, you have a number of rights relating to the processing of your personal data. Some rights will be effective as of 25 May 2018, e.g. the right to data portability. EasyPark processes your personal data to the extent it is necessary to fulfil your

rights. You exercise your rights by contacting EasyPark's customer service. See contact details below.

4.1 Right to access

You have the right to request to receive a confirmation from us if we process personal data which concern you, and request access to the personal data we process that concern you. Some of the data we store about you are available by logging in to your personal account in the Application and on the Website. A copy of your data can be requested through our customer service.

4.2 Right to rectification

If you believe personal data registered by EasyPark is inaccurate or inadequate you have the right to request that EasyPark corrects the personal data. You can correct some personal data by logging in to your personal account in the Application or on the Website.

4.3 Right to oppose to direct marketing

You have the right to, at any time, oppose to EasyPark's processing of your personal data in terms of direct marketing and unregister from future marketing communications by contacting customer service.

4.4 Oppose processing based on our legitimate interest

You have the right to oppose processing based on our legitimate interest for reasons relating to your particular situation. We may continue to process your personal data, even if you have opposed to the processing, if we have compelling legitimate grounds for the processing which overrides your privacy interest.

4.5 Right to erasure ("the right to be forgotten")

Under some circumstances, you have the right to have your personal data erased, e.g. if you have opposed to the processing and EasyPark doesn't have any compelling legitimate grounds for the processing to continue processing the data. This does not apply if we, for example, are required under law to store the data.

4.6 Request restriction of processing

Under certain circumstances, you have the right to request restriction of the processing of your personal data. If you request restriction, EasyPark

may not be able to fulfil its obligations to you during the period the processing of your personal data is restricted.

4.7 Data portability

Finally, you have the right to receive a copy of the personal data concerning you in a structured format and, if technically feasible, transfer the data to someone else (data portability). The right to data portability, compared to the right to access, only includes data which you have provided yourself and which we process based on certain legal grounds, e.g. the agreement with you (the terms).

5 Security

EasyPark takes the issue of security of your personal data very seriously. EasyPark implements appropriate technical and organisational measures to protect your personal data from unauthorised access, alteration or destruction. Access to information is limited in various ways (e.g. by user authorisation and passwords being required, which are only assigned to employees who need access to such information to be able to perform their work duties). Other security measures include encryption, firewalls and physical limitations and restrictions when accessing buildings and files.

6 Transfer of personal data to other recipients etc.

EasyPark shares personal data collected with the following recipients for the following purposes. The receiver is the data controller for its own processing of the personal data we share with them, unless otherwise is stated below.

6.1 Parking operators

We share data with parking operators in order for them to be able to carry out enforcement control of ongoing parking and verify parking carried

out in their areas. The parking operator may also handle anonymized location data for statistical purposes.

Enforcement control and verifying parking

Data	Legal basis for the processing
Identification Data , registration number	<i>Legitimate interest.</i> The processing of personal data is necessary in order to satisfy EasyPark's legitimate interest to fulfil the agreement with the relevant parking operators and parking operator's interest to check ongoing parking and to verify parking carried out in their areas.
Parking data , e.g. arrival/departure time and area code for parking	
Location data , in cases where the car's position is needed in order to check the parking, location data is shared with the operator of parking services.	

Provide the Services

If you park in a garage, your registration number or the unique ID of the RFID card is shared between us and the parking operator in order to start and stop parking at EasyPark.

Data	Legal basis for the processing
Identification Data , registration number and unique ID of RFID-cards	<i>Agreement.</i> The processing is necessary in order to for EasyPark to fulfil its obligations to you in accordance with the terms and conditions of the Services.
Parking data , e.g. arrival/departure time and area code for parking	

6.2 Payment receiver and payment service provider

If payment is made through invoice, personal data is shared with providers of invoice payment and, in some cases, with collection agencies in order to fulfil our obligations to you in accordance with the terms and conditions of the Services with invoicing as payment method.

If payment is made through a leasing company, personal data and information about your parking is shared with the leasing company in

order to make the payment associated with your car, leased through the leasing company.

Data	Legal basis for the processing
Identification Data , e.g. name, customer identification number, personal identity number, mobile phone number, registration number	<i>Agreement.</i> The processing is necessary in order to for EasyPark to fulfil its obligations to you in accordance with the terms and conditions of the Services.
Contact details , e.g. address, e-mail, phone number	Personal identification numbers are processed in order to ensure a safe identification of you.
Parking data , e.g. arrival/departure time and area code for parking	
Transaction data , e.g. paid parking fee and fees for the Services	

If payment is made through e.g. card or digital payment methods (e.g. ApplePay and MobilePay), we only share the invoice number and amount in order to complete the payment.

Data	Legal basis for the processing
Identification Data , invoice number	<i>Agreement.</i> The processing is necessary in order to for EasyPark to fulfil its obligations to you in accordance with the terms and conditions of the Services.

6.3 Group companies

EasyPark's technical platform is provided by the group company in Sweden to which personal data is transferred in order for EasyPark to be able to provide the Services to you.

All group companies have entered into an internal data protection agreement which purpose is to protect your personal data when they are transferred within the group of companies.

6.4 Service provider

In order to fulfil the purpose of the processing of your personal data, EasyPark can share personal data with service providers. These service providers provide, among other, the following services to EasyPark: information services, phone services (PSMS), support services and IT-

services, such as support, operation, improvement, development and services for handling mailings and produce cards. These service providers are only allowed to process your personal data in accordance with EasyPark's explicit instructions and cannot use your data for their own

purposes. They are also obliged to protect your data according to law and agreements.

6.5 Other recipients

In addition to the recipients mentioned above, EasyPark can, if it is necessary, share your personal data with the following recipients:

Recipient	Purpose	Legal basis for the transfer
Public authorities	We share your personal data with authorities to comply with legal obligations.	The processing is necessary to fulfil legal obligations.
Courts, external advisors and counterparties	In case of a dispute, we may transfer data to other parties.	The processing is necessary in order to satisfy our legitimate interest to establish, exercise and defend legal claims.
Law enforcement agencies, e.g. the Police	We may share personal data with law enforcement agencies, e.g. the Police if we have a legal obligation to share your personal data or in order to contribute to an ongoing criminal investigation.	The processing is necessary in order to fulfil legal obligations <i>or</i> satisfy our legitimate interest to contribute to an ongoing criminal investigation upon request.
Potential buyers and sellers	We may share information with potential buyers and sellers if we would transfer all or parts of our business or conduct a merger.	The processing is necessary in order to satisfy our legitimate interest to carry out an acquisition or merger.

7 Where is my personal data stored?

To the extent EasyPark processes your personal data the data is stored on servers within the EU.

Our service providers are in some cases located outside the EU/EEA. In order to ensure that your personal data is secure, EasyPark makes sure that appropriate safeguards are in place, e.g. data protection agreements which require that the receiver protects your personal data to the same extent as EasyPark. As of the 25 May 2018, you have the right to request information regarding to which countries outside the EU/EEA your personal data is transferred and a copy of the safeguards taken by EasyPark in order to protect your personal data.

8 Cookies

EasyPark uses cookies to optimise the Services, to perform statistic evaluations, for analyses, and for marketing. A cookie is a text file stored on, e.g., your computer or mobile device, which enables identification of your computer or mobile phone. Cookies help EasyPark to adjust, e.g., the Application and the Website based on your requests as a user of EasyPark's Services, see further information in our cookie policy.

9 Amendments to EasyPark's Privacy Policy

EasyPark may amend the Privacy Policy from time to time. If any amendments are made to EasyPark's Privacy Policy which imply any amendment to the way EasyPark processes your personal data, e.g. collecting additional personal data for the stated purposes or processing of data for new purposes, EasyPark will inform you of such amendments via, e.g., the Website, the Application or by email. EasyPark recommends that you regularly read EasyPark's Privacy Policy for the most recent information on how EasyPark processes your personal data.

10 Contact information

Should you have questions or comments regarding EasyPark's Privacy Policy, please contact EasyPark's customer service.

Telephone number: +46 (0) 770 87 00 00

Email address: dpo@easypark.net

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