

# Privacy and cookie policy

At SwipBox International A/S ("SwipBox", "we", "us" or "our") we give high priority to confidentiality and data security. This privacy policy applies to our processing of personal data and establishes guidelines for the way SwipBox processes your personal data and provides you with the information that you are entitled to receive under applicable data protection laws. You should read the privacy policy before you hand over your personal data to SwipBox.

## 1. Data controller and contact information

The data controller of your personal data is:

### **SwipBox International A/S**

**Address:** Ellegårdvej 7, DK-6400 Sønderborg

**CVR-no.:** 36 47 85 51

**E-mail:** dpm@swipbox.com

**Telephone number:** +45 73 43 65 01

## 2. If you visit our website

The following paragraph describes SwipBox's processing of personal data about visitors to [www.swipbox.com](http://www.swipbox.com)

### **2.1 Cookies**

We use cookies on our websites to, among other things, optimize the user experience and the functions of the websites as well as to prevent abuse and downtime. You can read more about the use of cookies in our cookie banner, which appears on the front page when you visit our website for the first time.

You can always change your cookie settings by clicking "Cookies Settings" in the bottom of the webpage.

### **2.2 If you use the contact form on the website, contact our customer support or otherwise communicate with us**

#### **Types of personal data**

When using the contact form on the website [www.swipbox.com](http://www.swipbox.com) or otherwise communicate with SwipBox. SwipBox collects and processes your personal data. SwipBox can collect, process, and store the following types of personal data:

- Name, email address, phone number
- Country
- Company name
- What your inquiry is about
- Date of your inquiry
- Other information you provide in connection with your inquiry.
- We encourage you not to provide sensitive personal data to us unless it is strictly necessary for the processing of your inquiry. In this context, the information should only be sent in a highly encrypted form if you send the information by e-mail.

### **Purpose of the processing**

Your personal data will be processed for the following purposes:

- Handling of your inquiry
- General communication
- Statistics and analysis

### **Legal basis for processing**

SwipBox processes your personal data on the below-mentioned bases. The basis depends on the nature of your inquiry.

- Legitimate interests: We may process your personal data on the basis of our legitimate interests in handling your inquiry, communicating with you, and developing our products and services (Article 6(1)(f) of the General Data Protection Regulation).
- Contractual obligations: If your inquiry concerns a (potential) formation of contract, we process your data to implement measures before the formation of contract (Article 6(1)(b) of the General Data Protection Regulation).

## **3. If you apply for a job with SwipBox**

When you apply for a job with SwipBox, we process your personal data in connection with the recruitment procedure. We recommend that you do not disclose your social security number or any sensitive personal data in your application, such as personal data revealing racial or ethnic origin, religion, trade union membership, sexual orientation, or health data.

### **Types of personal data**

SwipBox may collect, process, and store the following personal data:

- Personal data which you have disclosed in your job application and CV as well as any attachments
- Personal data you disclose during any job interviews
- Information about you, including information regarding your previous jobs, activities, competencies, performance, as well as your general appearance, which is publicly available on the internet, including on social media (e.g., Facebook and LinkedIn)
- References from former and/or current employers listed in your application or references you have consented us to contact
- Health data if the position you have applied for imposes special health requirements
- Additional information you will provide in relation to the recruitment process

### **Purposes of the processing**

Your personal data will be processed for the purpose of assessing whether we can offer you a position at SwipBox.

## **Legal basis**

SwipBox will mainly process your personal data based on the following legal basis:

- Contractual obligations: We may process your personal data on the basis of your request to enter into an employment contract with SwipBox (Article 6(1)(b) of the General Data Protection Regulation).
- Legitimate interests: We may process your personal data on the basis of our legitimate interests in carrying out further assessments of whether we want to hire you, including on the basis of publicly available information on the internet (Article 6(1)(f) of the General Data Protection Regulation).
- Consent: In exceptional cases and only when no other legal basis can be applied, SwipBox may ask separately for your consent to process your personal data. SwipBox will, for instance, only take references from your previous and/or current employers or collect your health information or criminal records if you have consented to this (Article 6(1)(a) and 9(2)(a) of the General Data Protection Regulation and section 8(3) of the Danish Data Protection Act).

## **4. If you are a supplier, business partner, etc.**

This section contains the policy for SwipBox's processing of personal data of sole proprietorship owners or contacts of suppliers and other business partners working with SwipBox.

### **Collection of personal data**

SwipBox may collect, process, and store your personal data in the following cases:

- When your company or the company you work at enters into an agreement with SwipBox
- When you have shown interest in SwipBox's products and services, e.g., by providing SwipBox with your business card
- When collaborating and communicating with SwipBox

### **Types of personal data**

SwipBox may collect, process, and store the following types of personal data about you:

- Name, email address, phone number, and corresponding contact information
- Individual information, e.g., preferred languages
- Organisational information such as the name and address of the company, job title, employment area, primarily place and country of work
- Contractual information such as orders, invoices, contracts, and other agreements between your company (or your employer) and SwipBox that may contain e.g., your contact information
- Financial information such as payment terms, bank details and credit ratings (in the case of a sole proprietorship)

We may receive such information directly from you (primarily through emails and other correspondence with you) or from a third party such as your employer.

## **The purposes of the processing**

Your personal data may be processed for the following purposes:

- General planning, fulfilment, and the management of collaborations, including contracts
- Administration such as the processing of payments, rating evaluations, accounting, auditing, as well as providing support
- Marketing communication
- Conducting inquiries from you
- General communication
- Product and service development
- Statistics and analysis
- Compliance with applicable laws and regulations, e.g., fulfilment of our obligations to prevent illegal activities
- Managing conflicts

## **Legal basis for processing**

SwipBox primarily processes your personal data on one or more of the following grounds:

- Contractual obligations: In certain cases, the processing of your personal data is necessary to fulfil a contract (Article 6(1)(b) of the General Data Protection Regulation).
- Legitimate interests: We may process your personal data on the basis of our legitimate interests in, for example, managing day-to-day operations in accordance with legitimate and fair business practices, including planning, execution and management of the cooperation or our legitimate interest in, for example, performing credit ratings, statistics, analysis, marketing activities (where consent is not required), provide support and as well as improvement and development of our products and services. The processing may also be necessary for our legitimate interest in preventing fraud or establishing, defending, or asserting legal claims (Article 6(1)(f) of the General Data Protection Regulation).]
- Legal obligation: The processing of your personal data will in some cases be necessary for compliance with legal obligations, such as our obligation to prevent illegal activities (Article 6(1)(c) of the General Data Protection Regulation).

## **5. If you visit our social media profiles**

This section contains the policy for SwipBox's processing of personal data collected through SwipBox's profiles or social media pages.

SwipBox and the social media providers are jointly responsible for the processing of personal data collected in connection with your visit to SwipBox's profile or page on the individual social media platform. SwipBox complies with the General Danish Data Protection Agency's guidelines on shared data liability and using available tools and means, tries to ensure that you receive information about the processing of your personal data when you visit SwipBox' profiles or pages on social media.

### **SwipBox has profiles or pages on the following social media platforms:**

- Facebook (Meta Platforms Ireland Ltd.)
  - Facebook's privacy policy is available here
  - You can customise your privacy settings on Facebook here
- YouTube (Google LLC)
  - Google's privacy policy is available here
  - You may adjust your privacy settings for YouTube here
- LinkedIn (LinkedIn Ireland Unlimited Company)
  - LinkedIn's private policy is available here
  - You can customise your privacy settings on LinkedIn here

### **Collection of personal data**

When you visit or interact with our social media profiles, SwipBox and the social media provider may collect, process, and store the following types of personal data about you:

- Information available on your profile, including your name, gender, civil status, work-place, interests, image, and your city
- Whether you "like" or have applied other reactions to our profile
- Comments you leave on our posts
- That you have visited our profile

### **Sensitive Personal Data (Disability or Health Information)**

In some surveys or feedback tools, SwipBox may collect information about your disability status or accessibility needs (e.g., whether you use a wheelchair or have reduced vision). This data is considered special category personal data under the GDPR and is processed only with your explicit consent.

We collect this information to improve accessibility and inclusivity in our services and products. Your data will be handled confidentially, stored securely, and never shared with third parties unless you've explicitly consented to it.

You can withdraw your consent at any time by contacting us at [dpm@swipbox.com].

### **The purposes of the processing**

SwipBox processes your personal data for the following purposes:

- Improving our products and services, including our social media profiles and pages
- Statistics and analysis
- To be able to communicate with you if you comment on a post, make a review, or send us a message
- Marketing in general

Social media providers process your personal data for the following purposes:

- Improving their ad system
- To provide SwipBox with statistics which the social media providers produce based on your visit to our profiles and pages
- Advertising and customising the activities on the page.

## **Legal basis for processing**

The processing of your personal data is based on the following basis:

- Legitimate interests: SwipBox bases the processing of your personal data on our legitimate interests in being able to communicate with and market us to you on our social media profiles, as well as our legitimate interest in improving our products and services (Article 6(1)(f) of the General Data Protection Regulation).

Social media providers base the processing of your personal data on their legitimate interests, including their interest in improving their ad system and providing statistics to SwipBox, which the social media provider, for example, prepares based on your visit to SwipBox' profile or social media page.

In addition, the social media providers have a legitimate interest in providing an innovative, individually adapted, secure and profitable service (Article 6(1)(f) of the General Data Protection Regulation).

- Consent: The social media providers process some of your personal data in accordance with your consent, which you can withdraw at any time through your social media privacy settings (Article 6(1)(a) of the General Data Protection Regulation).

## **Who do social media providers share your personal data with?**

Social media providers may, among other things, share your personal data with the following categories of recipients:

- Other devices in the group of which the social media provider is a part of
- External partners providing analysis- and survey services
- Advertisers
- Other individuals visiting our social media profile or page (to the extent that your information is publicly available)
- Researchers and other academics

Please go to the privacy policy of the individual social media providers for more details on the parties with whom the social media providers share your personal data.

The social media providers may transfer their personal data to recipients outside the EU/EEA in accordance with applicable data protection legislation. You can read more in each provider's privacy policy.

You can read more about who SwipBox shares your personal data with, in the Section Disclosure to other data controllers and outsourcing to data processors below.

## **6. How long do we store your personal data?**

We will delete your personal data when we no longer need to process them in relation to one or more of the purposes set out above. However, the data may be processed and stored for a longer period in anonymised form, or if we are required to do so by law.

Personal data that is necessary to document your customer relationship is stored for as long as the customer relationship lasts. After termination of the customer relationship SwipBox stores your data as long as the data is necessary to document SwipBox's legal position vis-à-vis you, e.g., in connection with a dispute or collection of arrears.

Book-keeping material, including personal data, which we are obliged to store in accordance with the Danish Consolidated Bookkeeping Act (Bogføringsloven), is deleted no earlier than 5 years after the end of the financial year to which the data relates.

### **Job applications:**

If you are offered a job at SwipBox, your application and other relevant personal data collected in connection with the recruitment procedure will be stored in your employee file, and as long as it is necessary in relation to your employment.

If you are not offered a job, we will store your application and any additional personal data collected in connection with the recruitment procedure for a period of 6 months following our rejection of your application, unless you have consented to storage of such personal data for a longer period of time.

You may at all times withdraw any consent you may have given as part of our recruitment procedure. Withdrawing your consent will affect the future processing of your personal data, but it will not affect the legitimacy of the processing that took place based on your consent given prior to such withdrawal. If you wish to withdraw your consent, please contact us, using the details below.

## **7. Disclosure to other data controllers and outsourcing to data processors**

To achieve the above purposes, we may give third parties access to your personal data, which, based on a contractual relationship with SwipBox, provides relevant services, this could be IT suppliers or other suppliers that process personal data for us. Such suppliers will only process personal data in accordance with our instructions according to the signed data processing agreements.

In the context of SwipBox's development, the corporate structure may change, e.g., by the total or partial sale of the company. In the case of a partial transfer of assets containing personal data, the processing basis for the related transfer of personal data is, as a rule, Article 6(1)(f) of the General Data Protection Regulation, since SwipBox has an interest in transferring parts of its assets and making commercial/-structural changes.

In addition to what is described above, your personal data is generally not disclosed to a third party without your consent. However, in certain circumstances and under the law, it may be necessary to disclose your personal data to e.g., the police, lawyers, accountants, courts, other public authorities, potential buyers and affiliated companies.

If your personal data are transferred to data processors or data controllers established in countries outside the EU/EEA that do not have an adequate level of protection, such a transfer will only take place once a transfer basis is secured. In addition, the transfer will be based on the EU Commission's standard contracts. If you have any questions about the basis for transfers to countries outside the EU/EEA, please contact us at [dpm@swipbox.com](mailto:dpm@swipbox.com).

## **8. Your rights**

- You have the right to access the personal data we process about you
- You have the right to object to our collection and further processing of your personal data
- You have the right to rectification and deletion of your personal data, however there are certain statutory exceptions, including the Bookkeeping Act
- You have the right to ask us to restrict the processing of your personal data
- In certain circumstances, you may also request to receive a copy of your personal data and to transmit the personal data you have provided to us to another data controller (data portability)
- You can withdraw any consents you may have given at any time. We will then delete your personal data unless we may continue the processing on another basis.

## **9. Questions and complaints**

If you have any questions about this privacy policy or if you wish to complain about the way we process your personal data, please feel free to contact us:

SwipBox International A/S  
Ellegårdvej 7  
6400 Sønderborg  
E-mail: [dpm@swipbox.com](mailto:dpm@swipbox.com)  
Telephone number: +45 73 43 65 01

If your complaint is not dealt with by us, and you wish to proceed with the matter, you may file a complaint with the supervisory authority in your country. You may find a list of supervisory authorities [here](#).

The Danish supervisory authority (Datatilsynet)  
Carl Jacobsens Vej 35  
2500 Valby  
Email: [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk)  
Telephone number: +45 33 19 32 00