

INFORMATION ON THE PROCESSING OF PERSONAL DATA AS PART OF COACHING SERVICES

Safe and secure processing of your personal data is important to us. Zebrain therefore takes technical and organizational measures to protect your personal data which we process as part of our platform for coaching services via our website "www.Zebrain.se" and our application.

Zebrain AB, 559138-1271, ("**Zebrain**", "**we**", "**us**") is responsible for the processing of your personal data when providing our coaching services as set forth below.

Personal data is all information that can be directly or indirectly attributed to you as an individual.

Coach, is an individual who uses our coaching service to communicate and coach clients by creating a user account and registering as a coach (which also includes coaches during training).

Client, is an individual who, by creating a user account and registering as a client on our coaching platform, intends to take part in our coaching services. This is done either in your role as an individual or as an employee of one of our corporate customers.

FROM WHERE DO WE COLLECT YOUR PERSONAL DATA?

We will process your personal data which:

We collect **from you** in connection with you registering as a user, and further in the use of our coaching service, either on our website or via our application.

Is collected or generated **automatically** when you use our website and / or application.

WHEN AND WHY DO WE PROCESS PERSONAL DATA?

Create and manage user accounts, including platform administration

We process personal data that we have collected from you to create and manage your user account as part of our coaching service. This includes i.a. to administer login details and authorizations, close / deactivate and activate user accounts and otherwise ensure that information uploaded to the service is not misleading, inappropriate or otherwise in violation of our terms of use and internal guidelines. A user account is required for you as a client or coach to be able to access and use our platform.

Client and Coach

Categories of personal data	Legal Foundation
<ul style="list-style-type: none">• Identity details• Contact information• Organizational information• Information from behavioral analysis	<i>Fulfillment of contract.</i> The processing is necessary to fulfill our rights and obligations under the terms of use with you as a client or coach, e.g. to be able to create and manage your user account.
<p>Retention period: Personal data is retained for this purpose until you or the corporate customer to whom you belong / represent chooses to terminate the subscription of our service. If this happens, your personal data will be anonymized according to the purpose "Evaluate and follow up the use and trends as part of the coaching service" below.</p> <p>If you choose to unsubscribe and thereby deactivate your account, your personal data will be stored "dormant" in the service for a period of 12 months, i.e. the data will not be used for any purpose other than storage for the purpose of enabling you to later reactivate your account with retained information. User accounts that have been inactive for a period of 12 months will be deleted by Zebrain.</p>	

Evaluate and follow up the use and trends as part of the coaching service

We process personal data that you, as a client or coach, enter in our coaching service, in order to evaluate and follow up the use of our platform. This may involve producing reports on trends and statistics based on information submitted on the platform (e.g. the number of coach / client meetings, the extent to which different individual needs and coaching orientations are handled in the service and outcomes in behavioral analysis and measurement of potential) in order to improve and develop our service. The processing itself consists of us anonymizing the now mentioned personal data, i.e. the reports on trends and statistics will not be attributable to you as an individual.

Client and Coach

Categories of personal data	Legal Foundation
<ul style="list-style-type: none"> • Identity details • Organizational information • Contact information • Your communication • User-generated data 	<p><i>Legitimate interest.</i> The processing is necessary to satisfy our legitimate interest in following up, evaluating and improving our service.</p> <p><i>Explicit consent.</i> Any sensitive personal data (e.g. information about your mental or physical health) that you submit as a client in our service will only be processed following your provided explicit consent.</p>
<p>Retention period: Reports on an aggregated level that do not contain any personal data and statistics are saved until further notice.</p>	

Manage and protect systems and services

To manage and protect our IT systems and services, e.g. for logging, troubleshooting, backup, change and problem management in systems and in connection with any IT incidents, we process your personal data if necessary.

Client and Coach

Information	Legal Foundation
<p><i>All personal data necessary to fulfill the purpose of the processing.</i></p>	<p><i>Legitimate interest.</i> The processing is necessary to satisfy our legitimate interest in managing and protecting our IT systems and services.</p>
<p>Retention period: Personal data is retained during the same period as stated in relation to each separate purpose of processing as set out above. Personal data in logs is retained for troubleshooting and incident management for a period of 12 months from the time of the log event.</p>	

Manage and respond to legal claims

In order to manage and respond to legal claims, e.g. in connection with a dispute or a legal process, we must, where applicable, process your personal data.

Client and Coach

Information	Legal Foundation
<i>All personal data necessary to fulfill the purpose of the processing.</i>	<i>Legitimate interest.</i> The processing is necessary to satisfy our legitimate interest in handling and responding to legal claims, e.g. in a dispute and litigation.
Retention period: Personal data is retained as long as necessary to manage and respond to the legal claim.	

Fulfill legal obligations

We process your personal data in order to fulfill legal obligations that apply to us, e.g. concerning accounting and auditing.

Client and Coach

Information	Legal Foundation
<i>All personal data collected that is necessary to fulfill the respective legal obligation.</i>	<i>Legal obligation.</i> The processing is necessary to fulfill legal obligations that apply to us.
Retention period: Personal data is retained as long as necessary for us to be able to fulfill the legal obligations that apply to us. Regarding retention requirements according to accounting legislation, we will for example retain such data for a period of seven (7) years after the end of the calendar year in which the financial year ended.	

RECIPIENTS WHO WE SHARE PERSONAL DATA WITH

When necessary, we share personal data with different recipients:

Recipient	Purpose	Legal basis for extradition
Authorities	We share personal data with law enforcement agencies (e.g. the police) and external auditors if we are required by law to disclose information.	<i>Legal obligation.</i> The processing is necessary in order to fulfill legal obligations.
Banks	We share personal data with banks to be able to handle payment transactions in connection with our services.	<i>Legitimate interest.</i> The processing is necessary in order to satisfy our legitimate interest in carrying out payment transactions.
Potential buyers/ Investors	We share personal data with potential buyers and investors in the event of an investment, acquisition of the business or a merger.	<i>Legitimate interest.</i> The processing is necessary in order to satisfy our legitimate interest in carrying out the investment, acquisition or merger.
Advisors, counterparties, etc.	To be able to handle and respond to legal claims, we share your personal data with external parties.	<i>Legitimate interest.</i> The processing is necessary in order to satisfy our legitimate interest in handling and responding to legal claims.

Service providers

To fulfill the purposes of the processing of personal data, we share your personal data with service providers engaged by us, such as IT providers (e.g. for operation, technical support and maintenance of IT systems and provider of video solution in our platform) and others who provides services on our behalf. The service providers we have engaged may only process your personal data in accordance with our express instructions and may not use your data for their own purposes. They are also required by law and agreement to take appropriate technical and organizational security measures to protect your data.

WHERE DO WE PROCESS YOUR PERSONAL DATA?

We always strive to store and process your personal data within the EU / EEA area. Should your personal data be transferred to and processed in a country outside the EU / EEA area by our service providers, we will ensure that there are safeguards in place, e.g. data transfer agreements and that other necessary measures have been taken to protect personal data.

If you have questions about which countries we, where applicable, transfer your personal data to and the safeguards taken, or if you would like to request a copy of such safeguards and information, please contact us at the contact details below.

YOUR RIGHTS

The data protection legislation gives you a number of rights in relation to the processing of your personal data.

Your rights

(i) Right to rectification

Zebrain will take steps in accordance with applicable data protection laws to keep your personal data accurate, complete and up to date. You have the right to correct incomplete or incorrect personal data.

(ii) Right to erasure

Under certain conditions, you have the right to request deletion of your personal data.

(iii) Right to restriction of processing

Under certain conditions, you have the right to restrict the processing of your personal data to only the storage of personal data, e.g. during the time we are investigating whether you are entitled to erasure in accordance with point (ii) above.

(iv) Right of access

You have the right to receive a confirmation from Zebrain that your personal data is processed by us and, if so, to access the personal data and the following information:

- the purpose of the processing;
- the categories of personal data processed;
- recipients of personal data;
- the period during which the personal data is processed;
- information about the rights set forth herein;
- information about the source from where the personal data has been collected; and
- if there is automated decision-making, including profiling.

In addition to this, you also have the right to receive a copy of your personal data in a commonly used electronic format upon request. Please note that we have the right to charge a fee in case you request more than one (1) copy of your personal data.

(v) Right to object to processing

When processing is carried out on the basis of a legitimate interest or involves direct marketing, you have the right to object to the processing. Zebrain must then present a compelling legitimate ground for continuing the processing.

(vi) Right to data portability

When the processing of your personal data takes place because the processing is necessary to fulfill or enter into an agreement with you, and provided that the personal data has been collected directly from you, you have the right to receive a copy of your personal data in a commonly used machine-readable format.

(vii) Rights in relation to automated decision-making, including profiling

You have the right not to be subject to fully automated decision-making, including profiling, if such decision-making has legal effects or in a similar way significantly affects you.

(viii) Complaints to the supervisory authority

You are welcome to contact us with questions or complaints regarding the processing of your personal data. However, you also always have the right to file a complaint regarding the processing of your personal data to the relevant supervisory authority (in Sweden the Authority for Privacy Protection).

WHO DO I CONTACT IF I HAVE QUESTIONS?

If you have any questions about the processing of your personal data, you are welcome to contact us.

Data controller: Zebrain AB

Postal address: Birger Jarlsgatan 34, 114 29 Stockholm

E-mail: info@zebrain.se

Phone number: 0768-936265

CATEGORIES OF PERSONAL DATA

Below you will find an explanation of the categories of personal data that we may collect and save about you.

Client	
Category	Examples of Personal Data
User-generated data	Information contained in various logs (e.g. access and action logs) or created / entered in the service by the client (e.g. in "whiteboard" notes, the chat function with coaches and the "client card")
Identity information	Name, personal identity number
Contact information	Address, Postal code and E-mail details
Organizational information	Title, Position, Employer/ Company

Information from behavioral analysis	Information from the answers that the client gives in behavioral analysis, e.g. concerning your qualities such as level of inspiration, your drive, your analytical ability and how supportive you are.
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Coach	
Category	Examples of Personal Data
User-generated data	Information contained in various logs (e.g. access and action logs) or created / entered in the service by the coach (e.g. the chat function with clients and in notes)
Identity information	Name, personal identity number
Contact information	Address, Postal code and E-mail details
Organizational information	Title, Position, Employer/ Company
Information from behavioral analysis	Information from the answers that the Coach gives in behavioral analysis, e.g. concerning your qualities such as level of inspiration, your drive, your analytical ability and how supportive you are.