

PRIVACY POLICY

About Spark Vision AB and this privacy policy

Spark Vision AB, Reg. No. 556656-7029, Johannefredsgatan 1, 431 53 Mölndal, Sweden (“**Spark Vision**” or “**we**”) develops and sells products within the field of 3D visualisation and digital interaction, we produce photorealistic CG Visuals and have invented software products.

As part of our business, Spark Vision processes personal data for which Spark Vision is the data controller. This means that Spark Vision is responsible for ensuring that the processing of personal data is carried out in accordance with applicable law and this privacy policy. We take necessary measures to make sure that your personal data are being processed by us in a lawful, fair and transparent manner.

It is important to us that you feel comfortable with how we process your personal data. This privacy policy covers all necessary information about our personal data processing and it is important that you read and understand this privacy policy before you use any of our services. You should not use any of our services if you do not approve of this privacy policy. Should you have any questions regarding our processing of your personal data, please contact us by using the contact details below.

Please note that our website may contain links to websites provided by third parties. These websites have their own privacy policies and Spark Vision is not responsible for their business or their information policies. We recommend users who submit information to or through these third-party websites to review the privacy policies on these websites before submitting any personal data to them.

What personal data do we collect and where from?

The types of personal data that we collect may, depending on the context, include:

- name and contact information including address, mobile number and e-mail address;
- job applications, including cover letters, resumé, and photos (as applicable);
- user name and password to our online services and desktop software;
- delivery and billing information, payment information and other information that you provide in connection with the purchase or delivery of a product or service; and
- other information that is relevant for customer surveys, advertisement/marketing or offers.

We may collect your personal data from the following sources:

- when you contact us by **e-mail or phone**;
- Spark Vision’s **website**, e.g. when you subscribe to our newsletter, request information or submit a job application;
- by way of **agreement, invoice** or other **business contact**, if you are a customer or a contact person for any of our business partners; or
- from **third parties** in the form of public records or any of our business partners.

For more details about the personal data we process, the purposes for our processing and for how long we process your personal data, please see below.

What personal data are processed for which purpose, on which legal grounds and for how long?

Spark Vision may use your personal data for the purposes and legal grounds set out below, and for as long as specified below.

1.1 Purchase of our services

For which purposes do we process your personal data, i.e. what we do and why	What personal data we process and where we have collected them	What is our legal basis for the processing?	For how long do we process your personal data, for each purpose?
We collect your personal data to give our customers' users access to our software services	E-mail, company/employer, information regarding license, and potentially name.	Our legitimate interest to fulfil our obligations towards our customers by giving their users access to our software services, including administration of the user account and a user's use of the software.	For as long as our agreement regarding the software is ongoing.
We collect and process your personal data in order to assess in which way and to what extent our software is used to provide you and/or your organization with adequate support and guidance based on user statistics.	User statistics of a specific user in the software.	Our legitimate interest to ensure that you as a customer can use the software to its full extent, including all its features and functions.	For as long as our agreement regarding the software is ongoing.
We save invoice documentation in accordance with applicable accounting laws and regulations.	Information specified on our invoices, such as name and contact details, which your company has provided to us.	To comply with our legal obligations.	For as long as we have an ongoing agreement and for a period of seven years after the end of the fiscal year during which the invoice in question was issued, in accordance with applicable law.

1.2 Customer service or other communication

For which purposes do we process your personal data, i.e. what we do and why	What personal data we process and where we have collected them	What is our legal basis for the processing?	For how long do we process your personal data, for each purpose?
We collect your personal data for the purpose of providing you with customer service. Your data will be used, and potentially shared within our organisation if necessary, in order to answer your query.	Your name, contact details, address and other information that you may provide throughout our contact through phone calls or e-mail.	Our legitimate interest to provide you with customer service.	For as long as it is necessary for us to answer your question and complete any follow-up inquiries.
We collect and use a contact person's personal data in order for us to be able to communicate with you and handle any business transaction made by a business contact on behalf of a company.	Your name, organisation and position, phone number, e-mail, which have been provided by either you directly or your organisation.	Our legitimate interest to communicate with our customers' contact persons.	As long as you are a contact person for a company doing business with Spark Vision or has access to our software services. If your personal data is included in any agreement, we store it for ten years after the expiration or termination of such agreement due to the period of limitation according to the Swedish Act on Limitation.

1.3 Newsletter and marketing

For which purposes do we process your personal data, i.e. what we do and why	What personal data we process and where we have collected them	What is our legal basis for the processing?	For how long do we process your personal data, for each purpose?
We collect and process your personal data in order to contact you through email with direct marketing, customer	We collect your name and contact details when you submit them on our website.	Your consent. You can withdraw your consent at any time. Please see below under "Your rights" for details on how to	For as long as we have your consent (i.e. until you withdraw your consent, which is explained in further

surveys or our newsletter.		withdraw your consent.	detail below under "Your rights".
We collect and use your personal data in order for us to market our service in the best possible way and keep contact with you to maintain and improve our business relationship.	Your name, contact details and details regarding products purchased from us.	Our legitimate interest to market our service in the best possible way and to keep contact with you to maintain and improve our business relationship.	For as long as five years after the business relationship has ended, unless you object to your personal data being used for direct marketing purposes.

1.4 Recruitment

For which purposes do we process your personal data, i.e. what we do and why	What personal data we process and where we have collected them	What is our legal basis for the processing?	For how long do we process your personal data, for each purpose?
We collect your personal data and process them in order to carry out a recruitment process.	We collect your application documentation, including your name, contact details, resumé, cover letter and photo, as applicable, when you submit them upon application for a job.	To fulfil our obligations in relation to an employment agreement.	During the recruitment process and for two years thereafter, in order for us to defend potential legal claims.

1.5 Product development

For which purposes do we process your personal data, i.e. what we do and why	What personal data we process and where we have collected them	What is our legal basis for the processing?	For how long do we process your personal data, for each purpose?
In order for us to optimise our product development and be able to build a fantastic product loved by our users.	Our customer users' use of our software, including statistics on end-user behaviour and selection, collected through our software once users use it.	Our legitimate interest to build and develop our product.	For as long as our agreement regarding the software is ongoing. After the agreement has ended or been terminated, we will aggregate and anonymise this user data.

Transfer of personal data

Spark Vision only transfers personal data as described below and we do not sell personal data to third parties. Below we list transfers that may occur to parties acting on our behalf as data processors:

- **Business partners:** Our business partners will get access to your personal data to the extent necessary for them to fulfill their obligations relating to your purchase. We will clearly state when one of our business partners is involved in your purchase.
- **Third-party service providers:** Some companies provide services on our behalf. These services include, IT services such as communication systems and tools, cloud storage and hosting services, payment and accounting services, CRM systems and services, delivery services and recruitment services. These companies will get access to your personal data to the extent necessary for them to fulfill their obligations, but they may not use or share the information for any other purposes.

Below we list transfers that may occur to parties acting as data controllers:

- **Legal obligations:** Your personal data may also be disclosed for the purpose of Spark Vision's compliance with certain legal obligations and it may be transferred to the Police and other relevant public authorities when permitted and required by law.
- **Business transactions:** If all or part of Spark Vision's operations is sold or integrated with any other business, operation or company, your personal data may be disclosed to our advisors, potential buyers and their advisors, and be transferred to the new owners of the operation.

Transfer of personal data outside of the EU/EEA

Under certain circumstances, personal data will be transferred to countries outside of the EU/EEA (third countries). When such transfers are carried out, Spark Vision takes appropriate measures to ensure that your personal data is adequately protected and ensures that at least one of the following conditions are fulfilled in relation to each of those transfers:

- the transfer is made to a receiving country that the EU Commission has decided ensures an adequate level of protection, meaning that the personal data can flow from the EU/EEA to that third country without further safeguarding measures being necessary;
- the transfer has been secured through the entering of an agreement including certain standard contractual clauses issued by the European Commission ((EU) 2021/914) between Spark Vision and the recipient, without any conflicting changes or amendments; or
- the recipient has adopted binding corporate rules for the processing which have been approved by the relevant supervisory authority and the recipient of the personal data in the third country is bound by these rules.

You have the right to obtain a copy of the safeguards that we use when transferring personal data to a country outside of the EU/EEA by contacting Spark Vision.

You can find more information about which countries are deemed to have an adequate level of protection [here](#), and you can read more about the European Commission's standard clauses [here](#).

Withdrawal of consent

In the event that we process your personal data based on your consent, it is important that you are aware of your right to withdraw your consent at any time. You may withdraw your consent by contacting us on the contact details provided below. Such withdrawal may be made in whole or in part. If you do not wish to receive marketing and offers from us, you can withdraw your consent by contacting us on the below contact details or, as regards direct marketing via e-mail, by following the link in our marketing e-mails.

Your rights

Applicable law grants you certain rights against us who process your personal data. We explain each of these rights below and what they mean for you with respect to the personal data that we process. If you wish to read more about what the Swedish Authority for Privacy Protection (Sw. *Integritetsskyddsmyndigheten*) (the “SAPP”) writes about these rights, please see the links to the SAPP below each of the relevant rights.

For the protection of your privacy and your personal data, we may require that you identify yourself in connection with our assistance.

If you have any questions or wish to know more, you are welcome to contact us on the contact details below.

Right to information and access

In this privacy policy, we provide a general description of the personal data that we process in various situations, however, if you would like to know more about whether or not we process your personal data and, if so, to which extent we process your personal data, you can contact us on the below contact details and request information about which personal data we process about you.

If you wish to read more about the right to information, read [here](#) (or, in Swedish, [here](#)).

We can also provide you with a copy of the personal data that we process. In such copy, we provide information about e.g. the categories of personal data that are processed, what the personal data are used for, for how long the personal data are stored, with whom the personal data have been shared and from where the personal data have been collected.

If you wish to read more about the right to access, read [here](#) (or, in Swedish, [here](#)).

Right to rectification

We always aim towards ensuring that the personal data we process are correct and updated when needed. If you identify that we process incorrect or ambiguous personal data about you, you have the right to request that these are corrected. You also have the right to request that we update incomplete personal data if it is relevant based on the purpose of our processing, by providing us additional information. Please contact us on the below contact details for such requests.

If you wish to read more about the right to rectification, read [here](#) (or, in Swedish, [here](#)).

Right to erasure (right to be forgotten)

You have the right to request that your personal data are erased or that the processing is restricted. However, this right is not absolute. In order for us to erase your personal data, certain circumstances must apply. For example, you may have the right to have personal data erased if the data are no longer necessary for the purposes for which they were collected, if you withdraw your consent or if you object towards us using your personal data for direct marketing purposes.

The right to erasure is also limited in the event that there is an applicable exemption for the personal data in question. For example, we have the right to store your personal data if it is needed in order to determine, make claims or defend ourselves against legal claims.

If you wish to read more about the right to erasure, read [here](#) (or, in Swedish, [here](#)).

Right to object

You have the right to object against our processing, if the legal basis for the processing (as specified above) is that it is necessary for purposes regarding our legitimate interest. If you object to our processing, we no longer have the right to process your personal data, unless we can provide a legitimate reason that outweighs your interests, rights and freedoms, or if we process the data in order to determine or exercise, or defend ourselves against, a legal claim. If we consider that we have such legitimate rights, or if the personal data are needed for the purpose of determining, exercising or defence against legal claims, we will communicate this to you, including the grounds for the assessment.

You can also object against your personal data being used for marketing purposes (including profiling, if applicable). If you object against marketing, we will no longer process your personal data for this purpose.

If you wish to read more about the right to object, read [here](#) (or, in Swedish, [here](#)).

Right to limitation of processing

You can request that the processing of your personal data is limited, for example if you do not consider that the personal data we process about you are correct, if you consider that the processing is unlawful, or while we review whether or not our legitimate interest outweighs your privacy interest when you have objected against the processing.

If you wish to read more about the right to limitation of processing, read [here](#) (or, in Swedish, [here](#)).

Right to data portability

You have the right to request that the personal data that we process about you and which you have provided to us (provided that our legal basis for the processing is consent or performance of a contract) be transmitted in a structured, generally used and electronic format. This presupposes that the processing is automatic (i.e. not in physical form on a paper). Of it is technically possible and if you request it, we can transfer your personal data to another controller.

If you wish to read more about the right to data portability, read [here](#) (or, in Swedish, [here](#)).

Right to withdraw your consent

You may, at any time, withdraw all or part of the consent you have given us, with effect from the time of withdrawal (i.e. the processing that has taken place prior to your withdrawal will not be affected).

Right to complain to supervisory authority

You may file a complaint with the SAPP (or another supervisory authority) if you believe that Spark Vision's processing of your personal data is not carried out in accordance with applicable laws.

If you wish to read more about the right to complain, read [here](#) (or, in Swedish, [here](#)).

Changes to this privacy policy

Please note that the information contained in this privacy policy may be changed or amended if needed in order for us to adequately describe how we process personal data. Any new version will be published on Spark Vision's website, why you should read this policy from time to time.

Contact us

If you have any questions related to this privacy policy, please contact us using by sending an e-mail to gdpr@spark-vision.com or send a regular mail to us as per below address.

Spark Vision AB, Johannefredsgatan 1, 431 53 Mölndal, Sweden