

PRIVACY POLICY COMMUNICATION AGENCIES

Regi Research & Strategi AB (org. no. 556388-6653) ("Regi") conducts research-based analysis and consultation for the purpose of quality assurance and business development for our customers. We process personal data as part of our business. Regi safeguards the privacy of all the parties we establish contact with. All processing of personal data is done in accordance with this policy and the requirements of the General Data Protection Regulation ("GDPR"). In case you have any questions regarding Regi's processing of personal data, please contact us at info@regi.se.

1. Controller of personal data

Regi Research & Strategi AB (org. no. 556388-6653, Regi Research & Strategi AB, c/o No18, Centralplan 15, 111 20 Stockholm) can act as both controller and processor of personal data in our business. In simplified terms, in case we process data on our own behalf, we accordingly act as a controller. When we, on the other hand, process data on another party's behalf, we act as a processor of personal data. For more information on this distinction, please see the description of each type of processing we conduct in our business below.

2. Description of our processing of personal data

Our processing differs to a certain extent between our different business areas. You can read about the processing we conduct specifically for each area in terms of its purposes and legal basis for the processing, the type of data concerned, and the duration of the processing.

2.1 Conducting industry analysis

2.1.1 What kind of processing do we conduct?

Regi conducts quality assurance and industry analysis concerning communication agencies' view of their own industry, market analysis, and analysis of the communication agencies' customers' view of the relationship with their respective communication agencies.

In order to analyse the communication agencies' view of their own industry, Regi establishes contact with persons holding leading positions at communication agencies and persons procuring communication services. In terms of this processing, Regi acts as the controller of personal data and the purpose is to conduct industry analysis. The contact details of the persons concerned are collected from public sources such as the websites of the communication agencies. The personal data concerned may typically consist of name, position at a certain company, work email, work phone number, and individualised links used for questionnaires.

In order to analyse the customers' view of the relationship with their respective communication agencies, Regi receives lists containing the contact details of the customers from the participating communication agencies. The processing conducted by Regi is done on the behalf of the communication agencies, consequently, Regi acts as a processor of personal data on behalf of the communication agencies that are the controllers of personal data. The purpose of the processing is to assess the quality of the communication agencies. In the processing, the respondents (i.e. the customers of the communication agencies) are contacted and asked to answer questions using a questionnaire accessed through an individual link and by phone interview. The results are subsequently compiled to be used as a basis for Regi's analysis. The results attributable to each client are not shared with the communication agencies. The processed personal data may include name, position at a certain company, work email, work phone number, and individual links used for questionnaires.

In order to enable us to provide our services to communication agencies, the personal data of contact persons at the communication agencies are processed – both in relation to agencies that already are our

customers and also regarding prospective customers. As to the data concerning existing customers, the processing is done with the aim to uphold the customer relationship. Data concerning prospective customers is collected from public sources and the purpose is to promote Regi's services. The data subject to processing may contain name, position at a certain company, work email, work phone number and references for invoices.

2.1.2 What legal basis do we have for the processing?

Concerning industry analysis, the legal basis for the processing is the legitimate interests of Regi. In this regard, Regi acknowledges that we have a legitimate interest of analysing trends in the communications industry in which our customers operate. Regi assesses that the interests or fundamental rights and freedoms of the registered persons does not outweigh our legitimate interest. Regi particularly acknowledges in this regard that all registered persons have their contact details published in public sources and that we operate in B2B-relations.

As to the analysis of the communication agencies' customers' view of the relationship with their communication agencies, the processing conducted by Regi is done on the behalf of the communication agencies, consequently, Regi acts as a processor of personal data on behalf of the communication agencies that are the controllers of personal data. The communication agencies are thus responsible for ensuring legal basis regarding the processing of personal data with a purpose that Regi will complete an analysis of the customer relationship and keeping the responses for a period of two years in order of back up.

In relation to Regi's processing of personal data concerning contact persons at communication agencies that are our customers, such processing is necessary to enable contact with the customer company, for instance to enable invoicing. In this regard, our processing is based on the necessity of performing in accordance with the contracts established with our customers. Additionally, some data, in particular invoice related information, is stored in order to comply with the legal obligations of Regi.

The processing of the contact details concerning communication agencies that we deem to be prospective customers, such processing is based on our legitimate interests. In this regard, Regi acknowledges that we have a legitimate interest of promoting our services. Regi assesses that the interests or fundamental rights and freedoms of the registered persons does not outweigh our legitimate interest. Regi particularly acknowledges in this regard that all registered persons have their contact details published in public sources and that we operate in B2B-relations.

2.1.3 Who are the recipients of personal data?

Regi does not sell any personal data to third parties. Some data may however be stored by our IT-suppliers who provide us with platforms for questionnaires, CRM-software, email and backup systems. Furthermore, phone interviews are conducted with the help of our business partners based on information provided by Regi that is subsequently returned to us. All recipients of personal data have entered into data processing agreements to ensure that the processing of your personal data is done in a correct and secure manner.

2.1.4 Duration of the processing

The contact details of the respondents are deleted after Regi has collected the answers needed for every survey. Contact details and other data that might be saved in questionnaires are stored for a duration of two years, i.e. both concerning answers from the customers of the communication agencies and the answers collected in the general industry analysis.

Contact details concerning our customers are processed for as long as they remain our customers and are only deleted following the end of the customer relationship. As to contact details of our prospective customers, such data is stored until the point of first contact (which occurs within in a month) and the

processing stops if there is no interest shown in Regi's services. The data might however continuously be processed for marketing purposes in the form of newsletters and invitations to events. This processing continues up until the processing is objected to (which can easily be done in all communication with Regi) and proper screening ensures to only contact details to prospective customers are stored. It is always possible to object to further processing in all of our email send outs.

Storage of personal data due to Regi's obligations continues as long as the legal obligations at hand require.

2.2 Events newsletter to our existing and prospective customers

2.2.1 What kind of processing do we conduct?

Regi arranges different events such as seminars, workshops, awards etc. for our customers and prospective customers. The purpose of the processing is to arrange events with the aim to maintain a dialogue with the industry, to acknowledge happenings, promote our services, and similar. The events shall moreover be planned and photos taken at the events may in some cases be used for marketing purposes.

Regi sends out newsletters per email for marketing purposes covering various aspects of our business. The email addresses used partly originate from our customers, but also from lists containing prospective customers whose contact details have been retrieved from public sources, and, in some cases, email addresses saved following attendance at our events. There is always an opinion, which is stated in every newsletter, to opt-out from further processing. In that case, your contact details will automatically be removed from our CRM-system, i.e. no longer processed for marketing purposes.

2.2.2 What legal basis do we have for the processing?

In order for us to arrange the different events of Regi, it is in the interest of us to have the names and contact details of the attendees in order to plan and manage the events. In this regard, Regi acknowledges that these actions fall within our legitimate interest. Regi assesses that the interests or fundamental rights and freedoms of the registered persons does not outweigh this legitimate interest. Regi particularly acknowledges in this regard that all registered persons have expressed their will to attend the events. Regarding the taking of photos at our events, it is only done to a limited extent and if individuals appear, the persons concerned are always informed. The processing done by the taking and publishing photos is based on our legitimate interests. In this regard, Regi acknowledges that we have a legitimate interest of conducting marketing. Regi assesses that the interests or fundamental rights and freedoms of the registered persons does not outweigh our legitimate interest. Regi particularly acknowledges in this regard that there always is a possibility to object to being photographed and that the contexts in which the photos may appear are not of any sensitive kind, but solely in industry-related contexts. Additionally, this entails B2B-relations.

As to the processing conducted in order to distribute our newsletter, it is also based on our legitimate interests. In this regard, Regi acknowledges that we have a legitimate interest of promoting our services. Regi assesses that the interests or fundamental rights and freedoms of the registered persons does not outweigh our legitimate interest. Regi particularly acknowledges in this regard that all registered persons can easily opt-out from further processing and that the processing ceases for marketing purposes. Furthermore, this entails B2B-relations and registered persons operate within the business area.

2.2.3 Who are the recipients of personal data?

Regi does not sell any personal data to third parties. Some data may however be stored by our IT-suppliers who provide us with platforms for questionnaires, CRM-software, email and backup systems. All recipients of personal data have entered into data processing agreements to ensure that the processing of your personal data is done in a correct and secure manner.

2.2.4 Duration of the processing

Contact details are stored in our CRM-system up until the point we receive an objection to further processing. There is a possibility to opt-out from further processing in all our email send outs.

3. Your rights as a registered person

If your personal data is processed by Regi, you are ensured the rights that we describe below.

3.1 Right to access

As registered, you have the right to request access to your stored personal data free of charge. However, if such request is made on repeated occasions, Regi reserves the right to charge a reasonable fee in order to administrate your request. A request may preferably be done in writing and sent to using mail to Regi Research & Strategi AB, Lilla Nygatan 1, 3tr, SE-111 28, Stockholm. Regi reserves to right to take actions in order to verify the identity of the person making the request.

3.2 Other rights

You may as a registered individual request rectification of incorrect or incomplete personal data, and request a transfer of your personal data (data portability). Moreover, you have the right to request a restriction of any further processing of personal data, and to demand erasure. Also, you always have the right object to any processing.

4. Transfer of personal data

Regi does not sell any personal data. For more information on the recipients of personal data, please see the description above regarding the different types of processing we conduct.

5. Transfers outside the EU/EEA

Regi does not transfer any personal data outside the European Union or the European Economic Area. Thus, all processing of personal data is mainly conducted within the EU/EEA. Nonetheless, if any data leaves the EU/EEA following the appointment of any sub-processors, Regi will always secure the processing by using specific data protection agreements and/or data processing agreements with any appointed sub-processors. These will primarily relate to decisions from the European Commission concerning adequate levels of protection for processing outside the EU/EEA.

6. Automated decision-making and profiling

Regi does not apply any form of automated decision-making or profiling in terms of analysing questionnaires.

7. Duration of the processing

Please see specific information regarding the duration of the processing in the description of our processing above.

8. Complaints

You may always lodge a complaint with the Swedish Data Protection Authority ("Datainspektionen") (www.datainspektionen.se, datainspektionen@datainspektionen.se, 08-657 61 00) regarding our processing of personal data.

This policy may be subject to amendments. Current policy was adopted by Regi on 10-06-2019.