

PRIVACY POLICY

GENERAL

This document was last updated in 14 March 2016.

“GWS” refers to (i) GWS Production AB, reg. no 556776-4674, c/o Ideon Science Park, Scheelevägen 27, SE-223 63 Lund, Sweden, including its affiliates; and (ii) Athena Risk Ltd, 30 Merchant House Cloth Market, Newcastle, NE1 1 EE (also referred to as “we”, “us”, or “our”).

GWS is committed to protecting your privacy and to comply with applicable data protection and privacy laws. Throughout this privacy policy (the “Privacy Policy”) the term “Personal Data” means information relating to an identified or identifiable individual (i.e. a natural person).

This Privacy Policy applies to the processing of Personal Data collected or submitted by you in connection with the use of the products and services (the “Service”) offered by GWS and its affiliates, partners and suppliers. Please read this Privacy Policy carefully to understand how we collect, use, transfer, and store your data as you make full use of the Service.

By using the Service and/or by submitting Personal Data to GWS, you express your agreement to the processing of your Personal Data in the manner provided here and in the Terms of Use. If you do not agree with the terms and conditions of this Privacy Policy and the Terms of Use, please do not use the Service or provide us with your Personal Data.

You may at any time revoke your consent by cancelling your account with GWS. You can cancel your account by contacting us and we will then delete or anonymize any Personal Data and any other information identifiable with you.

THE DATA WE COLLECT

When you use, or register for our Service or otherwise interact with us, we may ask you to provide us with information such as your name, email address, as well as user name, password and other credentials that are used to authenticate users and to validate their actions or that may be needed to provide you with the Service or to communicate with you. When you use, or register for our Service we automatically collect your phone number.

You accept that we gather, store, and analyse positional data from your phone and the networks the phone is connected to. This is necessary for us to provide you with the Service.

We also collect and process information about your actual location. The Service utilizes location information derived from multiple sources (e.g. GPS) to determine the location of your mobile device (“your location”), which is necessary for the Service to function properly. Please note that you need to enable the real-time positioning and sharing if want to use the real-time positioning sharing functionality of the Service.

If you use the Service as a service provided by your employer you allow GWS to provide your employer access to your positional data for the purpose of providing the Service and collect and process the data necessary for your employer to provide you with the Service, including your name, email address, phone number, positional data and other personal data you may have entered into the Service.

We will store your Personal Data and other information that you provide to us through the Service for so long as you have a valid account for the use of the Service. We will retain the collected Personal Data for some time after termination of the account, to enable us to respond to any queries that you

may have. After this we will delete all your Personal Data from our records, apart from any data that we are required to keep for legal purposes. We will however keep unidentifiable data for statistical reasons.

THE PURPOSES FOR WHICH WE PROCESS YOUR PERSONAL DATA

Your Personal Data may be processed for the following purposes and to the extent necessary for that purpose: i) to provide you with the Service; ii) manage, control and improve the use of the Service; iii) to ensure the security of the Service; iv) to create, develop, improve operate and deliver our products and the Service; v) to communicate with you; vi) to personalizing our offering, for example to make recommendations and to display customized content on our website; and vii) compliance with mandatory legal requirements and/or in connection with law enforcement or other civil or criminal legal proceedings.

We may use your Personal Data to communicate with you, for example, to provide information relating to our products and/or services you are using or to contact you for customer satisfaction queries. We may use your Personal Data for marketing or research purposes, for example, to conduct market research and we may, in accordance with applicable law, contact you to inform you of new products, services or promotions we may offer.

If you do not want GWS to process your Personal Data for direct marketing purposes you may give written notice on this matter to GWS using the contact details provided in this document.

SHARING OF YOUR PERSONAL DATA

GWS will not sell, lease, rent or otherwise disclose your Personal Data to unauthorized third parties without your explicit consent unless expressly otherwise stated below.

We may provide your Personal Data to third parties who work on our behalf for the above purposes. Such parties are not permitted to use your Personal Data for other purposes, and we require them to act consistently with this Privacy Policy and to use appropriate security measures to protect your Personal Data.

To be able to provide the Service we must sometimes use resources located in various countries around the world. Therefore, your Personal Data may be transferred across international borders outside the country where you use our Services, including to countries outside the European Economic Area (EEA) that do not have laws providing specific protection for Personal Data or that have different legal rules on data protection, for example, the United States of America. In such cases, we take steps to ensure that there is a legal basis for such a transfer and that adequate protection for your Personal Data is provided as required by applicable law, for example, by using standard agreements approved by relevant authorities (where necessary) and by requiring the use of other appropriate technical and organizational information security measures. You hereby give your consent to us transferring your Personal Data in accordance with the above. If you do not agree, please do not use the Service or provide us with your Personal Data.

We may be obligated by mandatory legislation to disclose your Personal Data to certain authorities, such as law enforcement agencies. We may also process your Personal Data in case needed to defend our legitimate interests in civil or criminal legal proceedings.

In the event that GWS is acquired by or merged with a third-party entity, or we transfer the Service to a third party, we reserve the right, in any of these circumstances, to transfer or assign your Personal

Data and other information we have collected from you as part of such merger, acquisition, sale, transfer or other change of control.

SECURITY OF YOUR INFORMATION

We recognize our responsibility to protect the Personal Data and other information you have provide us with. We take appropriate technical and organizational information security measures to safeguard your Personal Data against loss and misuse, as well as unauthorized access.

YOUR RIGHTS AND OBLIGATIONS

You have the right to once a year request a transcript of the Personal Data that we have about you. You may request to have inaccurate or incomplete data corrected or deleted. Please note that we may not be able to continue to provide the Service to you, if you wish us to delete or cease the processing of your Personal Data.

Please note that GWS may need to identify you and to ask for additional information in order to be able to fulfil your above request. Please also note that applicable law may contain restrictions and other provisions that relate to your above rights.

THE CONTROLLER OF YOUR PERSONAL DATA AND CONTACT DETAILS

If you have any additional questions or concerns about this Privacy Policy or our information practices, please feel free to contact us at any time.

GWS Production AB

c/o Ideon Science Park

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SE-223 63 Lund

Sweden