### Contents

Personal Data Policy	
	1
Your Rights	
	4
Annex 1, Personal Data Processing Table	6
Annex 2, Cookies	

## Personal Data Policy

## The purpose of this privacy policy

Your privacy is important to us at Bonanza Education AB (556395-0228) and Bonanzagraf AB (556575-4180), hereinafter collectively referred to as "Bonanza" and we are responsible for the personal information you provide us with. For you as a customer/visitor/user of our programs and services to feel safe, this privacy policy describes how Bonanza processes, stores and manages your personal data as well as your rights related to personal data processing.

## 2. Why do we process your personal data?

We process your personal data in order to fulfill our agreement and our commitments to you as a customer or user. We may also need to process the personal data as a result of a legal obligation, e.g., comply with the requirements of applicable legislation. More detailed information on each individual processing and its legal basis is set out in <u>Annex 1</u>.

We may also in some cases collect and process information about you who is not yet a customer but who wants to be contacted by us. How this data is processed is shown in <u>Annex1</u>, the <u>Personal Data Processing table</u>.

Personal data may also be used to improve the user experience and functionality of our websites.

# 3. Who is responsible for the processing of personal data? Bonanza is the data controller for the processing of the personal data that you (also called the "User") or your company (also called "The Customer") provide to Bonanza.

As a data controller, Bonanza is responsible for ensuring that your personal data is processed safely and that the General Data Protection Regulation (GDPR) is complied with. We do not process sensitive personal data unless there is specific consent and reason for processing it.

#### Bonanza can be reached as follows:

Mail: Bonanza Education AB, Klara Norra Kyrkogata 29, 132 37 STOCKHOLM

Tel: 08 445 70 40

E-mail: info@bonanza.se

## 4. When does this privacy policy apply?

This policy applies to users who visit and/or trade anything on the websites with the bonanza.se, bisgraf.com, bonanzaeducation.com, or bonanzaeducation.dk domains. It also applies to the use of any of our programs, apps and/or services as well as our social media channels.

## 5. How does Bonanza access your personal data?

Bonanza primarily accesses your personal data by providing it to Bonanza yourself. This can be done, for example, by providing the personal data by the Customer or the User on the respective website, by phone, email, chat or directly at one of our training courses, seminars or fairs. We may also access personal data through public registers, such as at, but not limited to, credit assessment.

## 6. Type of data processing

The type of processing carried out by Bonanza is set out in Annex 1, <u>in the Personal Data Processing table</u>. The table contains information on each type of data processing and the legal basis on which the processing is carried out.

## 7. Safety

Bonanza protects your personal data through a combination of technical and organizational solutions. Access systems are required for access to all bonanza systems that handle personal data. Bonanza employees, personal data processors and sub-processors shall comply with Bonanza's internal information security policy and no more employees than necessary have access to the data.

Personal data submitted to Bonanza without being requested will not be saved for longer than one month, the exception applies to spontaneous applications and support or contract matters, which can be saved for up to two years.

## 8. Bonanza as a personal supplementary bite

When Bonanza acts as a data processor for you as a user of one of our cloud-based services, a personal data processing agreement is required between you as a user and Bonanza.

Bonanza may, for support purposes and by agreement, remotely control your computer to help you as a user of our software.

#### 9. Sub-contractors to Bonanza Education AB

Bonanza uses for many of our services and cloud solutions. Bonanza undertakes to have personal data processing agreements with all sub-contractors and that, in addition to complying with GDPR, these sub-contractors also comply with Bonanza's privacy, availability and security requirements applicable in Bonanza's internal information security policy. Contact information needed for direct mail can be processed by our assistants.

#### 10. How are cookies used?

Read about cookies here »

## 11. How is personal data used in direct marketing?

Bonanza uses direct marketing to provide relevant suggestions and offers for you as a user of any of Bonanza's products. We also use direct marketing to provide you with information about when major news in your product areas is available.

Bonanza follows **SWEDMA** ethical guidelines regarding direct marketing.

## 12. Storage, storage time and transmission of information

Bonanza and its sub-processors store their information on servers within the EU.

The retention period for personal data depends on the type of processing referred to and, in some cases, bonanza must store data in order to comply with legal requirements. Personal data will only be stored when the storage meets a specified purpose. The storage period is also set out in <u>Annex 1</u>, the Personal Data Processing Table.

Transfer of customer information is not made to third parties.

## 13. Changes to this privacy policy

Updates and changes to this privacy policy are published on this page.

## Your Rights

As a registered with Bonanza Education AB, you have the following rights:

#### Request for information and rectification

You have the right to receive information about what personal data processing is done with us. We have collected these in Appendix 1, the Personal Data Processing table, below. The table shows, among other things, purpose, legal basis and storage time. You have the right to request rectification if we have incorrect information registered about you.

#### Request for registry extract

You have the right, free of charge, to request a register extract where you can see what personal data we process about you. You have the right to access the register extract within one month of requesting it.

#### Withdraw consent

In the event that certain processing of your personal data is carried out with the consent of you, you have the right to withdraw your consent to that processing at any time.

#### Right to erasure

You have the right to have your personal data deleted under these conditions:

- 1. if the data are no longer needed for the purpose for which it was collected.
- 2. If the data is saved with your consent and you withdraw the consent.
- 3. If the processing is based on a balance of interests and there are no longer legitimate reasons that outweigh your interest.
- 4. if the personal data has been processed illegally.
- 5. If you object to processing for direct marketing purposes.

The right to have personal data deleted does not apply if we are required by law (e.g., the Accounting Act) to keep the data.

#### **Dataportabilitet**

You have the right to data portability (right to have personal data that we store about you moved, copied or transferred to another IT environment, e.g., to a competing service or platform) provided that the legal basis is consent or agreement and applies only to personal data relating to you, which you yourself provided or generated by your actions/activities.

#### **Restrict processing**

You also have the right in some cases to restrict parts of our personal data processing. Restricting processing means that the data are marked so that in the future they may only be processed for certain defined purposes. This right applies, among other things, when the data subject has requested rectification and can then also request that the processing of personal data be restricted while the accuracy of the data is investigated.

#### Complain to the Privacy Protection Agency (IMY)

You have the right to lodge a complaint with the Privacy Protection Authority over processing carried out by us. The privacy protection authority is most easily reached by e-mail to imy@imy.se.

If you would like to invoke any of your rights, please contact us by phone +46 (0)8 445 70 40 or by email to info@bonanza.se.

# Annex 1, Personal Data Processing Table

Personal data processing	The purpose of the treatment	Categories of personal data	Categories of registered	Legal basis	Storage time
Purchase of product or service via one of our channels / accounts	Deliver the product / service	Contact, address and billing information	Customers	Agreement	Contract period + 1 year
receivable					
Test of product / service (demo)	Follow-up of product testing	Contact information	Potential customers	Balancing of interests	60 days
Visit the website	Analysis and follow-up	Cookie, IP address	Website visitors	Balancing of interests	1-365 days
Registration for free services such as seminars, webinars	Deliver the product / service	Name, email, company name	Customers, Potential customers	Agreement	Contract period + 1 year
Direct marketing	Offer goods / services	Contact information	Customers, Potential customers	Balancing of interests	3 years after the agreement expired or 3 years
Jobseeker specific service	Evaluate and choose the right person to recruit	Name, email, street address, age, CV, company, plus all data provided to us voluntarily	Job seekers	Balancing of interests	During the recruitment process + another 2 years
Processing of customer data	Delivery of service	All categories of personal data	Customers	Agreement	During the contract period + 90 days
Accounts payable	Buy goods / services	Billing information	Suppliers	Agreement, Legal obligation	7 years
Customer Support	Logging in case management system	Customer and contact information	Customers	Agreement	Contract period + 3 years
Contact by phone, chat	Documentation and fulfillment for recontact, agreement	Contact information, audio recordings	All categories	Balance of interests + Agreement	2 years
Contact via email, social media	Documentation and fulfillment for recontact, agreement	Contact information	All categories	Agreement + Balance of interests	5 years
Storage of data in the cloud	Store data on behalf of personal data controllers	All categories of personal data	Customers	Agreement	During the contract period + 90 days
Backup of stored data in the cloud / locally	Ensure access to data in the event of accidental or unintentional loss	All categories of personal data	Customers	Balancing of interests	13 months after the end of the agreement
Program and question service forum	Support and self-help	Contact information	Customers, Potential customers	Agreement + balance of interests	3 years
Notification of allergies	Ensure that you do not ingest things you do not tolerate	Health information	Customers	Protection of basic interest	During the contract period + 30 days
Registration BL Account	Create a BL Account to provide access to services that require a BL Account	e-mail address, login details, contact details	Customers	Agreement	During the contract period + 1 year
Address outlet for direct mail	Marketing	Address information	Potential customers	Balancing of interests	30 days
Sign up for a free service such as BL Newsletter	Deliver goods / services	email address	Customers	Agreement	During contract period + 30 days
Transfer of customer files	Support	Tasks included in the programs	Customers	Agreement	During the time the support case is open + 7 days, max 12 months
Remote control of customer computer	Support	Tasks included in the programs	Customers	Agreement	No No

Personal data processing	The purpose of the treatment	Categories of personal data	Categories of registered	Legal basis	Storage time
Register of personal data assistant agreements entered into	Comply with the provisions of the Data Protection Regulation	Customer information	Customers	Legal obligation	During the contract period + 1 year
Register for exercise of rights according to GDPR	Ensure that times are kept and that all requests are processed	Name and customer number	Customers	Legal obligation	10 years
Potential customers	Save contact information if interested in goods / services, e.g., programs	Contact information	Potential customers	Balancing of interests	3 years
Personal data incident management	Storage of personal data for affected persons in the event of personal data incidents	All categories of personal data	All categories	Legal obligation	10 years
Photography, filming, audio recording of customers	Marketing of products / services	General information, additional personal information	Customers	Consent	During current marketing or until revoked consent
Register for consent photo, filming, audio recording of customers	Ensure the legal basis for the processing of personal data	General information	Customers	Consent	During current marketing or until revoked consent
Logging of file downloads	Deliver according to agreement	Customer information	Customers	Agreement	6 months after download
Review of products on the website	Show who left the review	Name etc.	Customers	Balancing of interests	5 years

## Annex 2, Cookies

#### What is a cookie?

A cookie is a small text-based data file that a web server asks to save in your browser. By generally sending the contents of the cookie back with each request to the relevant website, it is possible for the server to keep track of the visitor's preferences, behavior or identity (to the extent that it is known). Cookies act as an ID and make the website work in the best possible way.

## Different types of cookies

There are three types of cookies and all are used on Bonanza's main website, as well as our application websites (bisgraf.com, etc.).

The first type, called Permanent Cookie, saves a file that remains on the visitor's computer. For example, it is used to keep you logged in even though you change sides, that a product you put in the cart should remain during your session, and that the website remembers if you have said yes or no to any kind of cookie before.

**The second type** is called Session Cookie. While a visitor is on a web page, it is temporarily stored in memory in the visitor's computer. Session Cookies disappear when you close your browser.

Bonanza's website also uses so-called **third-party** cookies. The purpose of third-party cookies is usually to compile statistics about visitors' browsing habits or to obtain data for targeted marketing on other websites, for example through digital advertising networks. **For third-party cookies, Bonanza Education AB is not the data controller.** 

If you do not want to receive cookies, you can change cookie settings in your browser, and you can also block cookies. Please note that if you block cookies, you will not be able to use all the features of Bonanza's website.

#### How are cookies used on Bonanza websites?

Cookies are stored on your computer to save your shopping basket in connection with purchases on the website. Cookies are also used to give you a personal experience on our website and for the website to function in the best way.

Bonanza's website uses cookies to improve the experience on the website in the following ways:

- 1. Make sure you only need to sign in once and not for every page you visit
- 2. Checks how the site is used by looking at traffic patterns. In this way, we can design the page to give you as a user the best experience
- 3. Saves what you shop in a shopping cart
- Customizes our services so that you only receive advertising that is relevant to you
- Collects and analyzes behavioral data based on the use of website and services in order to improve the user experience and enable personalized communication and messages to the user

#### Cookies and processing of personal data

When you visit bonanza.se or app.bisgraf.com, personal data is collected through cookies for different purposes and these processing is regulated by the EU Data Protection Regulation GDPR and the Swedish Data Protection Act. For more information about the processing of personal data, please read our personal data policy.

#### About interest-based advertising

The European Interactive Digital Advertising Alliance (EDAA) is a non-profit organization responsible for self-regulation for Online Behavioral Advertising (OBA) or in Swedish Interest-based advertising throughout Europe.

EDAA has developed the website Your Online Choices that gives you a detailed explanation of how interest-based advertising works and your choices. You are also given the opportunity to disable interest-based advertising.