

WordFinder

WORDFINDER PRIVACY POLICY

With this privacy policy, WordFinder Software International AB together with its subsidiaries WordFinder Software AB and WordFinder Japan KK ("WordFinder", "we", "our", "us") will explain how we process your Personal data and how we ensure that data processing is conducted responsibly and in accordance with applicable legislation. Starting May 2018, the General Data Protection Regulation (GDPR) is applicable within the EU/EEA¹.

1. GENERAL

1.1 At WordFinder we respect the integrity of our customers and others and have adopted this policy as a step towards providing strong protection for the Personal data we process. Taking great care to protect and respect your privacy, we strive to maintain a high level of security in all processing of Personal data. For that reason, WordFinder has taken necessary and appropriate technical and organisational measures in order to protect your Personal data from improper access, use, change and deletion.

2. DEFINITIONS

2.1 '*Personal data*' is any information relating to an identified or identifiable natural person. Such data may for example be name, picture, social security number, e-mail and home address, IP-address, information regarding skills, education or previous experience. Although a single piece of data may not be enough to identify you as an individual, a piece of data can amount to personal data if it, in combination with other data, can be linked to you.

2.2 The '*Controller*' is the natural or legal person, public authority, agency or other body which determines the purposes and means of the processing of Personal data, i.e. why and how Personal data is processed.

2.3 '*Personal data processing*' means, in essence, any operation taken with Personal data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

3. OUR PROCESSING OF YOUR PERSONAL DATA

3.1 Introduction

3.1.1 WordFinder is the Controller for the processing performed by us or on our behalf. This means that we determine why and how we process your Personal data. If you have any questions concerning how your Personal data is processed, please contact us using the contact details listed below.

¹ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

WordFinder

3.2 What Personal data is collected?

3.2.1 When you visit our websites www.wordfinder.se or app.wordfinder.com ("Website") you may provide us with Personal data you knowingly choose to disclose that is collected on an individual basis.

3.3 Personal data you choose to provide

3.3.1 Registration information

When you create an account on our Website, purchase a product, download software or software updates or participate in online survey you will provide us with information about yourself and, if applicable, your firm or company. Such user information will inter alia comprise your name, e-mail address, mailing address, telephone number, credit card information and similar information needed in order to identify you as user and in order for us to carry out payment transactions.

If your organisation has ordered an account for you we will be provided with Personal data such as your name, username and e-mail address.

You may also provide us with information when contacting our customer service and support or when providing additional comments on how you find our Website is servicing your needs and interests.

3.3.2 E-mail Information

If you choose to correspond with us through e-mail, we may retain the content of your e-mail messages together with your e-mail address and our responses.

4. FOR WHAT PURPOSES ARE PERSONAL DATA PROCESSED?

4.1 We collect and process your Personal data in order to be able to deliver and making available our services and products to you, to provide relevant customer service and support and to keep you informed of our services and products. We also collect and process your Personal data to be able to fulfil our obligations under EU- and national legislation, including for instance the Swedish Book-keeping Act and other administrative obligations. Occasionally, we may also collect and process the Personal data to notify you about important changes to our Website, new services as well as special offers and events we think you will find valuable.

5. CHROME

5.1 This section describes and explains what, how, and for what purpose, your Personal data is collected, stored and transmitted by WordFinder's Chrome extension, WordFinder for Chrome, and how the transmitted data is further processed.

5.2 The purpose of WordFinder for Chrome is to enable you to look up words in WordFinder's dictionary service. As such, the extension gathers the words or phrases that the user deliberately enters into the extension, either by typing in the

WordFinder

search window, or by selecting text on a website and activating the extension through a shortcut or context menu. The search words are transmitted to WordFinder's web server through a secure HTTPS connection. Once the search request has been processed by the server, WordFinder does not retain the search words. For the purpose of calculating royalties to the different content owners, WordFinder stores the number of dictionary lookups per customer per dictionary per month.

When WordFinder for Chrome is activated on a web page, it injects code into the downloaded web page to show a floating WordFinder window on the page. To give the best user experience, the size and location of this window, as well as the choice of dictionary, are stored locally, with separate settings for each tab and for each host name. The tabs and hosts are identified with non-descriptive hash numbers, calculated based on the current URL, the document referrer, and the length of the tab's browsing history. None of this information is transmitted or shared with other parties.

6. LEGAL BASIS FOR PROCESSING PERSONAL DATA

6.1 We will always process your Personal data in accordance with applicable law. Some of our processing is necessary for compliance with a legal obligation, for instance where the Swedish Book-keeping Act requires that Personal data is retained for a certain amount of time. In other cases we need to process your Personal data to be able to fulfil our contractual obligations to you or your company. Further we may process the Personal data based on a balanced legitimate interest, for instance for communicating information, incident and problem management of the services, product development and enhancement, crime prevention (fraud detection and prevention), general corporate operation and due diligence or for being able to provide industry watch-lists and industry self-regulatory schemes. We may also process the Personal data for marketing and general communicating purposes relying on your given consent, which consent can be withdrawn at any time.

6.2 In the event that we will process your Personal data for any purpose other than those mentioned above, we will inform you. For example, if we are to process your Personal data for any purpose that, according to applicable law, requires your consent, we will obtain your consent before such processing commences.

6.3 For how long is the data stored?

6.3.1 In our services

When you cancel your subscription, or in case of an automated cancellation due to inactivity, the Personal data will be removed after a period of two years unless you request an earlier removal. You may at any time remove your Personal data via our self-service facility.

WordFinder

6.3.2 In our Support System

When you cancel your subscription, or in case of an automated cancellation due to inactivity, the Personal data will be removed after a period of two years from the last time you contacted our Support System.

6.3.3 In our Enterprise Resource Planning System

Your Personal data will be kept in our Enterprise Resource Planning System for as long as is required by the Swedish Book-keeping Act.

6.3.4 In our E-mail Information System

Your Personal data will be kept as long as we have your consent to communicate with you. You can at any time opt out of our e-mail information campaigns.

7. **DISCLOSING OF PERSONAL DATA**

7.1 We may enter into alliances, partnerships or other business arrangements with third parties who may be given access to Personal data including your name, mailing address, telephone number and e-mail address for the purpose of providing you with information regarding our products and services that we think will be of interest to you. In connection with alliances, partnerships or arrangements, we may also provide certain Personal data to third parties if we have determined that the Personal data will be used in a responsible manner by a responsible third party. For example, some of our partners operate stores or provide services on our site, while others power offerings developed by us for your use. We also use third parties to facilitate our business, including, but not limited to, sending e-mail and processing credit card payments. In connection with these offerings and business operations, our partners and other third parties may have access to your Personal data for use in connection with such business activities.

7.2 As we develop our business, we may buy or sell assets or business offerings including the Personal data since customer-, e-mail-, and visitors information is generally one of the transferred business assets in these types of transactions. We may also transfer such Personal data in the course of corporate divestitures, mergers, or any dissolution. We will in such situations inform you accordingly.

7.3 We may disclose your Personal data if required to do so by law or subpoena or, to courts, supervising authorities and other similar authorities and institutions, if we believe that such action is necessary to:

- (a) conform to the law or comply with legal process served on us or affiliated parties;
- (b) protect and defend our rights and property, the Website, the users of the Website, and/or our affiliated parties; or
- (c) act under circumstances to protect the safety of users of the Website, us, or third parties.

WordFinder

7.4 Companies that process Personal data on our behalf will always enter into a data processing agreement with us in order to ensure that a high level of protection of your Personal data is maintained by our partners. In relation to non-EU/EEA partners, adequate safeguards are taken.

7.5 WordFinder will not disclose your Personal data to any extent other than described in this Section 7.

7.6 For a complete list of recipients of your Personal data, visit:
www.wordfinder.com/recipients

8. WHAT ABOUT OTHER WEBSITES LINKED TO OUR WEBSITE?

8.1 We are not responsible for the practices employed by websites linked to or from our Website nor the information or content contained therein. Links to other websites are often provided solely as pointers to information on topics that may be useful to the users of our Website.

8.2 Please remember that when you use a link to go from our Website to another website, our Privacy Policy is no longer in effect. Your interaction and browsing on any other website, including websites which have a link on our Website, is subject to that website's own rules and policies. Please read over those rules and policies before proceeding.

9. YOUR RIGHTS IN ACCORDANCE WITH APPLICABLE DATA PROTECTION LEGISLATION

9.1 You are entitled, in accordance with applicable data protection laws, to request access to the Personal data processed about you at any time. An extract of your Personal data can easily be downloaded directly from your user account for the services. You also have the right to have incorrect Personal data about you corrected, to request that we erase your Personal data, limit our processing of your Personal data, exercise your right to data portability, and object to the processing of your Personal data.

9.2 Where processing is based on consent you have the right to withdraw your consent to that processing at any time.

9.3 In case you would like to exercise any of your rights, please contact us through the contact details listed below.

9.4 You also have the right to lodge complaints with a supervisory authority at any time if you believe that your Personal data is processed in violation of applicable data protection legislation.

10. HOW DO WE PROTECT YOUR PERSONAL DATA?

10.1 How Do We Secure Personal data Transmissions?

10.1.1 Some of the Personal data you may enter on our Website may be transmitted securely via Secure Sockets Layer SSL, encryption services, which are enabled by inter alia NETS or STRIPE. Pages utilizing this technology will have URLs that

WordFinder

start with HTTPS instead of HTTP. We request that you do not send sensitive Personal data to us by e-mail but instead use relevant secure transmissions. Please contact info@wordfinder.com if you have any questions or concerns.

11. CONTACT DETAILS

11.1 WordFinder contact details

11.1.1 The Controller responsible for processing your information is WordFinder. If you have questions about how we process your Personal data or want information, please feel free to contact us via the following contact information:

WordFinder Software International AB or WordFinder Software AB

P.O. Box 2212

SE-403 14 Göteborg, SWEDEN

Visiting address: Västra Hamngatan 8

info@wordfinder.com

Tel: +46 31 719 62 00

For users registered in Japan, you may also contact:

WordFinder Japan KK