

BlippaCo AB

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Privacy Policy

Blippa

**PUBLISHED
DATE**
FEB 23, 2022

Effective as of Feb 23, 2022, BlippaCo AB, has updated its Privacy Policy.

Privacy Policy

Last Updated: Feb 2021

Blippa, Inc., (“Blippa”) and its subsidiaries (collectively, the “Blippa Group”, “we”, “us”, or “our”) are committed to protecting your information. This Privacy Policy (“Policy”) informs you how we collect, use, secure and share your personal information that we collect when you visit our Websites, use our Services, visit our branded social media pages, visit our offices, receive communication from us, register or attend our events or webinars, or ask questions about our products. We may change this Policy from time to time. We always indicate the date the last changes were published and we offer access to last version of our Policy for your review. If changes are significant, you will be notified prior to the change becoming effective either via a notice on our Websites or an email sent to the email address we have on file for you.

We may provide “just-in-time” disclosures or additional information about our data collection, use and sharing practices of specific services. These notices may supplement or clarify Blippa’s privacy practices or may provide you with additional choices about how Blippa processes your personal information.

If you do not feel comfortable with any part of this Policy, you should cease using our Websites and Services.

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1. **Policy Scope**

The Blippa Group is committed to protecting the privacy of individuals who interact with us. This Policy applies to the personal information we collect and use for our own purposes (i.e., as a “data controller”).

We provide this Policy to explain the ways in which we collect, use, and share personal information about individuals who:

- visit or interact with our websites, including www.Blippa.com, Blippa.com/labelsadmin as well as the other websites that the Blippa Group operates and that link to this Policy (collectively, “Websites”) (“Website Visitors”);
- subscribe to use our on-demand product excellence system, and tools and services made available from the Websites (our “Services”) through a Subscriber’s Account (“Users”); and

- attend or register to attend events which we organize or co-organize, or visit our offices (“Attendees”).

For purposes of this Policy “Websites”, shall refer collectively to www.Blippa.com, portal.Blippa.com as well as the other websites that the Blippa Group operates and that link to this Policy, the term “Services” shall refer to our on-demand product excellence system, and tools and services made available from the Websites. The term “Subscriber” refers to an individual that has agreed to our Terms of Service, available at: [Terms of service](#), or such other applicable agreement between you and any member of the Blippa Group relating to access and use of our Services (“Services Agreement”), including an individual representing the Subscribing company. The term “Account” refers to a Blippa account or instance created by or on behalf of a Subscriber within the Services. The term “Users” shall refer to the individuals authorized to use our Services through a Subscriber’s Account.

In providing our Services, we may process certain personal information on behalf of our Subscribers as a “data processor”. In such cases, Subscribers to our Services act as data controllers. Such Subscribers are solely responsible for establishing privacy policies for and ensuring compliance with all applicable laws and regulations, agreements or other obligations, relating to the processing of personal information of individuals who use the Subscriber’s instance of our Services. If you are an individual who uses a Subscriber’s instance of our Services, then except as otherwise noted in this Privacy Policy, the processing of your personal information will be subject to the Subscriber’s privacy practices, and you should contact that Subscriber for assistance with any requests or questions relating to the processing of your personal information.

2. Personal Information You Provide

In this Policy, “personal information” means information relating to an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, including by reference to an identification number or to one or more factors specific to his/her physical, physiological, mental, economic, cultural or social identity.

Account and Registration Information. If you are Subscriber, we must process certain personal information about you such as name, address, phone number, email address, instant messaging ID,

and credit card information to provide our Services (collectively “Account Information”), and name or alias for each of your Users. By voluntarily providing us with this information, you represent that you are the owner of such personal information or are otherwise authorized to provide it to us, specifically, if you as a Subscriber provide us information related to the User, you represent that the User has not objected to such processing. We use a third-party intermediary is used to manage credit card processing.

User Information. We collect certain information automatically from Users through cookies and other tracking technologies when they use a Subscriber’s Account, subject to the applicable law’s consent requirements. We use this information to improve our services. In relation to all of the information that Users voluntarily provides when working in a Subscriber’s Account, the Subscriber is the data controller and we are a data processor.

3. **Personal Information Automatically Collected**

Cookies and Other Tracking Technologies. We and our authorized partners use cookies and other information gathering technologies for a variety of purposes. These technologies may provide us with your personal information, information about devices and networks you utilize to access our Websites, and other information regarding your interactions with our Websites.

We partner with third parties to either display advertising on the Websites or to manage our advertising on other sites. Our third-party partners may use technologies such as cookies to gather information about your activities on our Websites and other sites in order to suggest advertisements based upon your browsing activities and interests.

Logs. As is true with most websites and services delivered over the Internet, we gather certain information and store it in log files when you interact with our Websites and Services. This information includes internet protocol (IP) addresses as well as browser type, internet service provider, URLs of referring/exit pages, operating system, date/time stamp, information you search for, locale and language preferences, identification numbers associated with your devices, your mobile carrier, and system configuration information. Occasionally, we connect personal information

to other information gathered in our log files as necessary to improve our Websites and Services. In such a case, we would treat the combined information in accordance with this Policy.

Session Replay Scripts. On our Services we may also use session replay scripts provided by third-party analytics service providers to better understand our users' needs and to optimize our Services and user experience. These website analytics tools provide us heatmaps, session recordings of your activities on the Services, form analytics, feedback campaigns, and similar features and functionalities, including to assist in website debugging and customer service matters. Our session replay script providers may record your clicks, mouse movements, scrolling, form fills (keystrokes) in non-excluded fields, and other metadata such as IP address or device type.

Do Not Track. Some Internet browsers, like Internet Explorer, Firefox, and Safari, include the ability to transmit "Do Not Track" or "DNT" signals. Since uniform standards for "DNT" signals have not been adopted, our Websites do not process or respond to "DNT" signals.

4. **Personal Information We Collect From Other Sources**

Social Media Widgets. Our Websites may include social media features, such as the Facebook Like button, and widgets, such as the Share This button or interactive mini-programs that run on our Websites. These features may collect your IP address, which page you are visiting on the Websites, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on the Websites. Your interactions with these features are governed by the privacy policy of the companies that provide them.

Single Sign-On. You can log into certain Services using sign-in services such as Google Authentication or SAML. These services will authenticate your identity, without the need to sign in with a username and password combination.

Information From Third Party Services. We may also obtain personal information from third parties and combine that with information we collect through our Websites. For example, we may have access to certain information from a third-party social media or authentication service if you log into our Services through such a service or otherwise provide us with access to information from the service. Any access that we may have to such information from a third-party social media or authentication service is in accordance with the authorization procedures determined by that

service. By electing to use a third party authentication service, you authorize us to process the personal information that the third party service makes available to us, and to use and disclose it in accordance with this Policy. The disclosure of your personal information is subject to the third party's privacy policy. You should check your privacy settings on these third-party services to understand the personal information sent to us through these services. For example, you can log in to the Services using sign-in services such as Google Authentication, as further described below.

5. Why We Process Your Personal Information

We process your personal information to:

- provide, operate, maintain and improve the Websites and Services;
- enable you to access and use the Services;
- process and complete transactions, and send you related information, including purchase confirmations and invoices;
- send transactional messages, including responses to your comments, questions, and requests; provide customer service and support; and send you technical notices, updates, security alerts, and support and administrative messages;
- send promotional communications, such as providing you with information about products and services, features, surveys, newsletters, offers, promotions, contests, and events; and provide other news or information about us and our partners;
- monitor and analyze trends, usage, and activities in connection with the Websites and Services and for marketing or advertising purposes;
- investigate and prevent fraudulent transactions, unauthorized access to the Services, and other illegal activities;
- personalize the Websites and Services; and
- comply with our legal obligations, including our obligations related to personal data protection.

6. Legal Basis for Processing Personal Information

For individuals who are located in the European Economic Area, the United Kingdom or Switzerland or Brazil) at the time their personal information is collected, our legal basis for processing your information under the applicable laws will depend on the personal information at issue, the specific

context in the which the personal information is collected and the purposes for which it is used. We generally only process your personal information where we are legally required to, where processing is necessary to perform any contracts we entered with you (or to take steps at your request prior to entering into a contract with you), where processing is in our legitimate interests to operate our business and not overridden by your data protection interests or fundamental rights and freedoms, or where we have obtained your consent to do so. In some rare instances, we may need to process your personal information to protect your vital interests or those of another person.

We process your information for the purposes described in this Policy, based on the following legal grounds:

(i) When we are pursuing legitimate interests.

- We process your personal information for our legitimate interests and those of third parties. This means that we process your information for things like: providing, operating; maintaining, and improving our Services; enabling you to access and use the Services; promoting the Services; sending promotional communications, including through the use of tools or services that may provide us with personal contact information for potential job applicants or business contact information for prospective customers; monitoring and analyzing trends, usage, and activities in connection with the Websites and Services (subject to applicable law); investigating and preventing fraudulent transactions, unauthorized access to the Services, and other illegal activities; personalizing the Websites and Services.

(ii) When we are providing a service pursuant to a contract.

- We process your personal information to provide you with our Services pursuant to the Service Agreement or other contract between you and us. This means that we process your personal information to: enable you to access and use the Services; process transactions, and send you related information; provide customer service and support.

(iii) When we are complying with legal obligations

- We process your personal information when we have a legal obligation to do so, for example, if we are responding to legal process or an enforceable governmental request.

(iv) With your consent.

- In certain situations, we may request your consent to process your personal information for specific purposes and you have the right to withdraw your consent at any time. For example, we ask for your consent to publish your testimonial, if it includes your identification. If you wish to withdraw your consent, you can contact us at privacy@blippa.com.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the “How to Contact Us” heading below.

7. Why We Share Your Personal Information

We take care to allow your personal information to be accessed only by those who really need access in order to perform their tasks and duties, and to share with third parties who have a legitimate purpose for accessing it. We may share personal information about you with third parties in the following circumstances.

- **Third-Party Service Providers.** We share your personal information with our third-party service providers that we use to provide hosting for and maintenance of our Websites, application development, backup, storage, payment processing, analytics and other services for us. A list of our third party subprocessors can be found on our website here: <https://www.Blippa.com/subprocessors/>. These third-party service providers may have access to or process your personal information for the purpose of providing these services for us. We do not permit our third-party service providers to use the personal information that we share with them for their marketing purposes or for any other purpose other than in connection with the services they provide to us.

- **Compliance with Laws and Law Enforcement Requests; To Protect Our Rights.** In certain situations, we may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We may disclose personal information to respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims. We may also share such information if we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Service Agreement or our Website Terms of Use, available at: <https://www.blippa.com/website-terms-of-use>, or as otherwise required by law.
- **Testimonials.** From time to time, we may post testimonials on the Websites that may contain personal information. We obtain your consent to post your name along with your testimonial. If you wish to update or delete your testimonial, you can contact us at privacy@blippa.com.
- **Referrals.** If you choose to use our referral service to tell a friend about our Services, we will ask you for your friend's name and email address. We will automatically send your friend an email inviting him or her to visit the Websites and will store this information for the purpose of sending this initial email, tracking the success of our referral program and other marketing activities. Your referral may contact us at privacy@blippa.com to request that we remove his/her information from our database.
- **Interactive Areas.** The Websites may offer feedback forms, comments sections, discussion forums, or other interactive features ("Interactive Areas"). You should be aware that any information that you post in an Interactive Area might be read, collected, and used by others who access it, in particular to Users who initiated the particular Interactive Area. To request removal of your personal information from an Interactive Area, contact us at privacy@blippa.com. In some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why.
- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, acquisition, dissolution,

corporate reorganization or similar event. We will inform any buyer that your personal information shall only be used in accordance with this Privacy Policy.

- **Blippa Group Sharing.** We may share information, including personal information, with any member of the Blippa Group.
- **With Your Consent.** We may also share personal information with third parties when we have your consent to do so.

8. **Security & Confidentiality**

We maintain (and require service providers to maintain) generally accepted, reasonable, and appropriate standards to protect your personal information, both during transmission and once it is received. For example, we employ physical access controls, encryption, Internet firewalls, intrusion detection and network monitoring depending on the nature of the information and the scope of processing. In deciding what is reasonable and appropriate we take into account the risks involved and the nature of the information. However, no security procedures or protocols are ever guaranteed to be 100% secure. In the event that we are required by law to inform you of a breach to your personal information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

If you have any questions about the security of your personal information, you can contact us at privacy@blippa.com.

9. **Retention of Your Personal Information**

We will retain personal information we collect from you where we have a justifiable business need to do so or for as long as is needed to fulfil the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law (such as tax, legal, accounting or other purposes). When we have no justifiable business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

10. **International Transfer of Personal Information**

We primarily store personal information about Website Visitors and Subscribers within the European Economic Area (the “EEA”) and in the United States. To facilitate our global operations, we may transfer and access such personal information from around the world, including from other countries in which the Blippa Group has operations. If and when transferring your personal data from the EEA, United Kingdom or Switzerland, or via an onward transfer we rely on the Standard Contractual Clauses adopted by the EU Commission as appropriate safeguards.

We will protect your personal information in accordance with this Policy wherever it is processed and will take appropriate contractual or other steps to protect the relevant personal information in accordance with applicable laws. We contractually obligate recipients of your personal information to agree to at least the same level of privacy safeguards as required under applicable data protection laws.

Blippa complies with the EU-U.S. Privacy Shield Framework and the Swiss – U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States, respectively.

11. Your Privacy Rights and Choices

Marketing Communications. If you do not want to receive marketing email communications from us, you can opt-out by clicking on the “unsubscribe” link located on the bottom of our marketing emails or you may send a request to privacy@Blippa.com.

Right to Correct or Update Your Information. You may request that we correct or update any inaccurate or incomplete personal information by contacting support@blippa.com. Subscribers to our Services may update or change their Account Information at any time by editing their profile or organization record or by contacting support@blippa.com for more detailed instructions.

Additional Rights for Certain Territories: If you reside in certain territories (such as the European Economic Area, Switzerland, the United Kingdom, Japan or Brazil), you may have the right to exercise certain privacy rights available to you under applicable law. If any of the rights listed below are not

provided under law for your jurisdiction, we have the absolute discretion in providing you with those rights.

Your personal information rights are not absolute. Depending upon the applicable law, access to your rights under the applicable law may be denied: (a) when denial of access is required or authorized by law; (b) when granting access would have a negative impact on another's privacy; (c) to protect our rights and properties; (d) where the request is frivolous or vexatious, or for other reasons.

- **Right not to provide consent or to withdraw consent:** We may seek to rely on your consent in order to process certain personal information. Where we do so, you have the right not to provide your consent or to withdraw your consent at any time. This does not affect the lawfulness of the processing based on consent before its withdrawal.
- **Right of access and/or portability:** You may have the right to access the personal information that we hold about you and, in some limited circumstances, have that data provided to you so that you can provide or port that data to another provider.
- **Right of erasure:** In certain circumstances, you may have the right to the erasure of personal information that we hold about you (for example if it is no longer necessary for the purposes for which it was originally collected).
- **Right to object to processing:** You may have the right to request that VMware stop processing your personal information and/or to stop sending you marketing communications.
- **Right to rectification:** You may have the right to require us to correct any inaccurate or incomplete personal information.
- **Right to restrict processing:** You may have the right to request that we restrict processing of your personal information in certain circumstances (for example, where you believe that the personal information we hold about you is not accurate or lawfully held).

To assert your privacy rights, please email privacy@blippa.com. Please note that to protect your privacy and security, we must be able to verify your identity before we can process your request to exercise any of the privacy rights that you may be entitled to under the applicable law. We may conduct the verification process by email or phone, and we may ask you to provide information such as your name, contact information, and any additional relevant information based on your

relationship with us. You may also use an authorized agent to submit a request to opt out on your behalf if you provide the authorized agent signed written permission to do so.

You may have other privacy rights if you are a California Residents, see our “Notice to California Residents” section below for more information.

Rights and Choices where Blippa Acts as a Processor: An individual who seeks access to, or who seeks to correct, amend, or delete inaccuracies in personal information stored or processed by us on behalf of a Subscriber should direct his/her query to the Subscriber (the data controller).

Social Media Accounts

We maintain accounts with various social media networks. When you visit these social media networks, a variety of data processing operations are triggered. We use your personal information when you visit Our profiles on these social media networks, or when you click on the like-button on one of our social media advertisements. When you visit Our profiles, your personal information is not only used by Us but also by the social network provider, regardless of whether you have a profile in the social network or not. The individual processing and its scope differ from provider to provider, and they are not completely transparent to Us. Details about the processing of the social network providers can be found in the relevant social media network’s Privacy Policy:

- Facebook by Facebook Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland:
facebook.com/about/privacy
- Instagram by Facebook Ireland Ltd., 4 Grand Canal Square, Dublin 2 Ireland:
help.instagram.com/519522125107875
- Twitter by Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07, Ireland, twitter.com/en/privacy
- YouTube by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland:
policies.google.com/privacy?hl=en-UK
- Pinterest by Pinterest Europe Ltd., Palmerston House, 2nd Floor, Fenian Street, Dublin 2, Ireland: policy.pinterest.com/en/privacy-policy

- Spotify by Spotify AB, Regeringsgatan 19, 111 53 Stockholm, Sweden:
spotify.com/ie/legal/privacy-policy/

The social network providers collect your usage information to provide us with usage statistics. To learn more about how such tracking takes place and to understand how we use social media plugins on our Websites, please read our Cookie Policy.

12. Notice to California Residents

This notice to California residents is provided under California law, including the California Consumer Privacy Act (“CCPA”), Cal. Civ. Code 1798.100, et seq.. The information provided below relates to the personal information, the Blippa Groups process as a data controller, which is known as a “business” under the CCPA. If you are a California resident, this Section applies to you in addition to the rest of this Policy.

Categories of Personal Information Collected. In the preceding 12 months, we have collected the following categories of personal information: *identifiers* (such as your name and contact information); *commercial information* (such as information about products or services you have purchased); *internet or other electronic network activity information* (such as your IP address, device identifier, and other information captured by online tracking technologies); and *inferences* drawn from the information collected about you. When you purchase a product or service from us, we may also collect *information described in Section 1798.80(e) of the California Civil Code* (such as signature and credit/debit card number). For examples of the precise data points we collect and the categories of sources of such collection, please see Sections 3, 4, and 5 of this Policy.

Business or Commercial Purpose for Collecting and Using Personal Information. We collect the categories of personal information described in this Section for the business or commercial purposes described in Section 6 of this Policy.

Categories of Personal Information Disclosed and Categories of Recipients. In the preceding 12 months, we have disclosed the following categories of personal information for business or commercial purposes to the following recipients:

- We share *identifiers* with advertising networks, Internet service providers, data analytics providers, operating systems and platforms, social networks, payment processors, customer support partners, events and promotions partners, and fraud prevention partners.
- We share *commercial information* with advertising partners, data analytics providers, payment processors, fulfillment partners, customer support partners, and fraud prevention partners.
- We share *internet and electronic network activity information* with advertising partners, Internet service providers, data analytics providers, operating systems and platforms, internet service providers, customer support partners, and fraud prevention partners.
- We share *information described in Section 1798.80(e) of the California Civil Code* (such as signature and credit/debit card number) with: our affiliates and subsidiaries, our business partners, financial institutions, professional services organizations such as auditors and law firms, and other service providers.
- We share *inferences* with advertising networks, internet service providers, data analytics providers, and fraud prevention partners.

We may also share the above categories of information with government entities as may be needed to comply with our legal obligations or prevent illegal or fraudulent activity.

Your Rights. For personal information collected by us during the preceding 12 months preceding your request that is not otherwise subject to an exception, California residents have the right to access and delete their personal information. We will not discriminate against those who exercise their rights. You have the right to (a) opt out of any sales of personal information that may be occurring; and (b) not be discriminated against for exercising these rights.

Sale of Personal Information. If you are a California resident, you have the right to “opt out” of the “sale” of your “personal information” to “third parties” (as those terms are defined in the CCPA). To submit a request to opt out of the sale of your personal information, you may visit our “Do Not Sell My Personal Information” page or send an email to privacy@blippa.com with the subject line “Do Not Sell My Info.”

If you are a California resident and you would like to exercise your rights described in this Policy, you can submit your request by emailing us at: privacy@blippa.com with the subject line "CCPA Rights."

13. Children's Personal Information

We do not knowingly collect any personal information from children under the age of 16. If you are under the age of 16, please do not use or submit any personal information through our Websites or Services. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce this Policy by instructing their children never to provide personal information through the Websites or Services without parental permission. If you have reason to believe that a child under the age of 16 has provided personal information to us through the Websites or Services, please contact us at privacy@Blippa.com, and we will use commercially reasonable efforts to delete that information.

14. Contact Us

If you have questions regarding this Policy or about the privacy practices of Blippa, please contact us by email at privacy@Blippa.com.