

Privacy Policy

Version 2018:9

1. General

- 1.1. Nordic GameKeeper AB ("NGK", "We" or "Us") supplies an application for wildlife management called FeedCon ("FeedCon", or "the App"). When someone uses the App, NGK may collect and process Personal Data (defined below). This privacy policy ("Privacy Policy") outlines the details of NGK's processing of Personal Data. **Please read this text carefully and return to NGK should you have any questions. Our contact information and company details are found at the end of this text.**
- 1.2. By ticking the "I accept" button when accessing the App, you agree that NGK process Personal Data in accordance with this Privacy Policy. If you do not want NGK to process your Personal Data, please refrain from using The App.

2. Definitions

- 2.1. For Personal Data which NGK process in order to supply the App, NGK determines the purpose and means for processing, and is thereby legally defined as a data controller ("Data Controller").
- 2.2. The term "Personal Data" refers to information that is directly or indirectly referable to a natural, living individual. This may include the name or e-mail address of a user, but could also include user created content, or any other data that fulfils the legal definition of Personal Data as set out by applicable law, such as the General Data Protection Regulation (Regulation (EU) 2016/679) ("GDPR").
- 2.3. The term "processing" refers to such actions that are performed with, or on, Personal Data. This may include collecting, transferring, storing, analysing, archiving, or erasing Personal Data.
- 2.4. The term "SmartTimer Owner" refers to the person, institution, company, or organization to which NGK has supplied one or several FeedCon Smart Timers.

3. Personal Data processed by us

- 3.1. **Personal Data that NGK collects.** When you sign up for and use the App, NGK collects and process your name and your e-mail address, as well as your date of birth. The collection and processing of your name and e-mail address is mandatory for your access to the App, whereas the other types of information is supplied completely voluntarily by you.

4. User Data

- 4.1. When you use The App, certain information may be logged in relation to your specific user account and you. This data thereby constitutes Personal Data and is defined as "User Data".
- 4.2. NGK will process User Data solely to the extent necessary to supply you with the functionality of the App and in accordance with your access level and subscription plan. To learn more about this, please read our Terms of Service, accessible [here](#).

5. Our purposes of processing Personal Data

- 5.1. NGK process your Personal Data for the purposes described below. Please note that you have the right to opt-out from certain types of processing, while not all. The reason for why some processing is not optional is that this processing is necessary in order to supply the App, and therefore not possible to opt-out from. Instructions on which type of processing that is optional and not, and how you opt out, is found below.

Purpose	Legal basis for processing	Possible to opt-out from processing
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To provide, manage, develop and customize The App and its various functionalities.	Our agreement concerning supply of the App.	No.
To set up and administer personal user accounts for The App.	Our agreement concerning supply of the App.	No.
To manage the user relationship with you, including communication concerning the application and its features.	Our agreement concerning supply of the App.	No.
To manage communication with you concerning the terms of service for The App, and NGK's processing of Personal Data (including updates of this Privacy Policy).	Our agreement concerning supply of the App.	No.
To meet safety requirements and various statutory requirements following from law, regulation or decision, injunctions or otherwise communication by court or public authority (including supervisory authorities).	Necessary for compliance with legal obligation.	No.
To detect, prevent, or pay attention to fraud and other security or technical issues.	Necessary for compliance with legal obligation.	No.
To perform customer and market analysis, market research, statistics, business monitoring and business development.	Your consent	Yes. Contact us via e-mail to opt-out. Email address is found at the end of this policy.
To provide you with information and direct marketing of similar and additional services or offerings from NGK, or any of its subsidiaries, or partners.	Your consent	Yes. Contact us via e-mail to opt-out. Email address is found at the end of this policy.

5.2. If you do not want Us to send you any direct marketing actions, you may opt- out from by sending us written notice to info@nordicgamekeeper.com or by following instructions set out in e-mail newsletter from us.

6. Data Processing Term

6.1. Unless otherwise stated in this Privacy Policy, your Personal Data is processed until thereto attributable user account is terminated, and for a subsequent period of 6 months. If you exercise any of your legal rights outlined in Chapter 7, this may further reduce the period during which NGK process your Personal Data.

7. Transfer of Personal Data

7.1. **Subcontractors ("Data Processors").** NGK may choose to include various subcontractors to perform the activities necessary to supply the App or otherwise to fulfil the purposes of processing your Personal Data, such as IT suppliers, server suppliers, digital analysing tools etc. ("Data Processor").

7.2. Data Processors may have their place of residence, or otherwise perform their business operations and/or services, within as well as outside the European Economic Area (EEA). Consequently, any Personal Data transferred to a Data Processor may be transferred to, and stored in, a country outside the EEA. As a result, you may have less legal rights in relation to your Personal Data. However, we strive to, at our best efforts, achieve and uphold an adequate level of security and integrity for Your Personal Data.

7.3. WHEN ACCEPTING THIS PRIVACY POLICY, YOU AGREE TO OUR TRANSFER OF YOUR PERSONAL DATA TO DATA PROCESSORS OUTSIDE THE EEA.

8. Your Rights

- 8.1. You have several legal rights aimed at safeguarding your personal integrity in relation to the processing of your Personal Data. Below, we have summarized these rights to help you understand them and how you may exercise these rights. However, since the legal field is under continuous development, this list may not be exhaustive. For the avoidance of doubt, any additional rights following from new laws, regulations, or industry practices will apply in addition to below summary.

Right to rectification. We will in our sole discretion, or upon your request, correct Personal Data that is found to be incorrect or misleading.

Right to information. You are entitled to, by signed application, obtain a transcript of our processing of your Personal Data. Once per calendar year, this service is free of charge. Please send any such request to e-mail address set out below. Please mark your e-mail: "Request for information concerning data processing."

Right to withdraw consent. You have a right to withdraw your consent to certain types of processing. Should such withdrawal render it impossible for us to supply you with the App, your user account will be terminated. In this case, you will be notified thereof in due time so that you may safeguard any user content and other information that may be important to you.

Right to information concerning transfer outside the EEA. You have the right to learn about which safety measures that apply to establish and maintain an adequate level of safety for your Personal Data when this information is transferred outside the EEA. If you would like to learn more about this, please contact us with your request using the e-mail address set out below.

Right to Data Portability. You have the right to receive from us your Personal Data in a structured, commonly used and machine-readable format. Please send any such request to e-mail address set out below.

Right to file complaint with the supervisory authority. You have the right to file complaints concerning our processing of your Personal Data with the supervisory authority. In Sweden, this authority is named 'Datainspektionen', and you may find their contact info via their website: www.datainspektionen.se

Right to erasure (Also known as 'the right to be forgotten'). We strive to limit our processing of your Personal Data. Should you choose to delete your user account, we will delete your Personal Data as soon as possible, and no later than after 3 months. In addition to this, we will erase your Personal Data within 1 month if:

- You withdraw your consent to processing, and there is no other legal basis for processing, or
- You oppose processing and there are no overriding legitimate reasons that outweigh your rights to personal integrity, or
- The Personal Data must be erased for compliance with a legal obligation set out in Union- or Member State law, or
- Personal Data have been unlawfully processed.

Right to restriction. You have the right to claim that we restrict processing when:

- You suspect that processed Personal Data is inaccurate (for the time needed to verify whether that is the case), or
- Processing is unlawful, but you agree to limited processing instead of deleting the data, or
- You need the Personal Data to establish, exercise, or defend a legal claim.

9. Miscellaneous

9.1. **No automated processing.** For the avoidance of doubt, your Personal Data is not used for automated decision making, including profiling.

9.2. **Changes to this Privacy Policy.** If we make changes to this Privacy Policy, we will notify you by publication on our website. For material changes, we will also provide you with prominent notice as appropriate under the circumstances (e.g. by e-mail to your e-mail address or pop-up when you start the application) and, where required under applicable law, ask for your consent.

- 9.3. NGK has the right to assign and subcontract its rights and obligations following from this Privacy Policy.
- 9.4. **Change of Ownership.** If the ownership of NGK's business or the App changes, NGK reserves the right to transfer and/or assign your information, including your user account, User Data, and your Personal Data, to the new owners, or partners thereto, regardless whether they are resident and having business operations within or outside of the EU/EEA, so they can continue supply the App. This includes any assignment to a company within NGK's group of companies, including an owner of, or subsidiary to, NGK, or to a company that is not owned by, or otherwise affiliated with, NGK. Any new legal entity will still have to honour the commitments NGK has made in this Privacy Policy.
- 9.5. This original version of this Privacy Policy is written in English. Should any translated version of the Privacy Policy conflict with the English version, the English version shall prevail.

10. Company Details and Contact Information

Company name:	Nordic GameKeeper AB
Company registration number:	556626-9410
E-mail address:	info@nordicgamekeeper.com
Visiting Address:	Skällentorp Hög 110, 311 67 Slöinge, Sweden.
Postal Address:	Skällentorp Hög 110, 311 67 Slöinge, Sweden.
Data Protection Officer	Not Applicable.