

# Privacy Policy

## HyperHouse Technology AB

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### This Privacy Policy:

- deals with the principles that are being followed by personal data processing. Specifically following the principles defined in EU General Data Protection Regulation (GDPR).
- aims to inform Users of the Application on the use of their personal Data by the Administrator and on their rights.
- is subject to changes with respect to legislation changes or evolution.

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### 1. Definitions

- Application: means HDC (FM Access), HDC.cloud, HyperDoc;
- Data: means all data, personal or not, broadcasted, transferred or inserted by the users through the application (text, pictures, video,...);
- Personal Data: means all data which can identify directly or indirectly a physical person;
- Data subject: means the physical persons (ie User) registered into the application, from an industrial workforce or a production workforce. The Data subject must be of age;
- Administrator: means the individual in charge of the personal data in the exact context of this data privacy charter. He/She is the contact for anybody to request the execution of User rights according to the law of the user country;

- Services: means all services proposed by the Application. The Services enable the connection of an industrial workforce with a production workforce with whom they have an existing contractual relationship in order to optimize the performance of production.
- Data Controller: The company or legal person who is hosting this application and is seen as responsible of possessing personal data.

## 2. Data processor

**HyperHouse Technology AB** (Tessel Systems) org. nr. 556607-6815, EU VAT: SE556607681501, BOX 70396, 107 24 Stockholm, Sweden (privacy@tessel.se) acts as data processor for the person using the Application. We process personal information only to the extent that we need to maintain the system and provide the agreed services. These services are carried out on behalf of the data controller and based on the agreement between Data Controller and Data Processor.

## 3. What personal Data are collected?

The Application does not collect any sensible data. Data considered sensible are Data such as the one defined by law, all sensible data relative to sexual orientation, health, political philosophical or religious opinions, and alliance to work unions.

Data collected are:

- Last name and first name of the User;
- Login Id (username);
- Telephone number;
- Email address;
- Pictures inserted by the User in the Application are potentially considered as personal information if they enable the identification of somebody (profile picture).

These data are used to create a User Profile and can be visible to other authorized users of the system.

Other data collected based on User activities:

- Log information
- IP address of the device used to connect to the Application;
- Last login date and time, login count;
- Application Audit trail: audit trail is based on actions performed by the User in the Application;
- Web browser Local storage and Cookies. We may collect and store information (including personal information) locally on your device using mechanisms such as browser web storage (including HTML 5) and application data caches. This data is needed to maintain session and provide personalized user experience.

Data are encrypted and the Application is secured (HTTPS). The Administrator is committed to deploy all means to ensure the entire security of the Data.

Any Personal Data stored in field that are not classified as bearer of Personal Data is not covered by this Privacy Policy.

## **4. Personal Data usage**

Collected Data are only made for professional reasons and in accordance of the proposed Services by the Application. Data are used to identify a User and inform other Users from any production problems and potential action to deploy for resolution. Data are also used for resolving errors in the system.

The other usages are: account administration, Data security access, opposition and modification rights, customer relationship follow-up.

Some Personal Data will be visible to other users of the Application in order to enable user interaction and notifications. An e-mail notification will be sent out to the User based on system preferences and User actions performed in the system.

## **5. Regular disclosure of information**

Personal Data are made available to any professionals to whom the User agreed to collaborate with in order to operate the production performance.

Data are shared to suppliers who are committed to ensure Data Privacy with regards to the applicable law. In case of litigation, Data might be transferred to legal administration on formal request.

Internally Data are treated only by authorised professionals (user management, IT, customer support).

## **6. Transfer of data outside the EU or the European Economic Area**

Personal data is not transposed regularly outside the EU and the European Economic Area. If data is transferred from within the EEA to a jurisdiction outside the EEA, it is done so under a Data Transfer Agreement, which contain standard data protection contract clauses. The European Commission has adopted standard data protection contract clauses (known as the Model Clauses) which provide safeguards for personal information that is transferred outside of Europe. We use Model Clauses when transferring personal data outside of Europe.

## **7. Retention of Personal information**

Personal Data are stored for the mandated duration required for their treatment in respect to the law.

Data are kept while the account is active or inactive. When the account is deleted, all Data are deleted or anonymized, except for when there are legal justifications to keep data.

An account will be closed and Data will be deleted or anonymized for inactivity, if any activity is realized within the Application for a duration of two (2) years, except for when there are legal justifications to keep data.

## **8. User obligations**

The User agree to respect the Law, in particular the privacy law, the intellectual property law and the industrial property law. When uploading pictures or movies within the Application, the User must make sure no copyright, image right or confidential information is infringed.

The User commits to upload only content strictly compliant with rules of public policies and social mores.

The User commits in particular, without being exhaustive to, not use or propagate any content which is offensive, abusive, defamatory, racist, xenophobic, revisionist or harming reputation or honour of others, discriminating others, pornographic or paedophile.

When the User is made aware of such content in the Application, he/she must inform diligently by mail at [privacy@tessel.se](mailto:privacy@tessel.se)

The User is the only responsible for the content he/she uploads.

## 9. User Rights

Each User have, in respect to the Law, a right to access, oppose and modify the Data which have been collected by the Application. The request to exercise the rights must be declared by mail on the contact: [privacy@tessel.se](mailto:privacy@tessel.se)

In respect of the Law, the Administrator can refuse demands which are qualified as abusive, especially by their numbers, their frequent or systematic occurrences.

These are the user rights in detail:

- the right to be informed about the collection and use of your personal data
- the right of access your personal data
- the right to rectification of inaccurate personal data
- the right to erasure of your personal data
- the right to restrict processing of your personal data
- the right to data portability so that you can obtain and reuse your personal data for your own purposes across different services
- the right to object to the processing of your personal data in certain circumstances if you can show that you have a compelling reason for doing so

## 10. Changes to our Privacy Policy

We may change this privacy policy from time to time. We will post any privacy policy changes on this page and, if the changes are significant, we will inform by adding a notice on login screens, or by sending you an email notification. We encourage you to review our privacy policy on a regular basis to stay informed about our information practices and the ways you can help protect your privacy. Contact [privacy@tessel.se](mailto:privacy@tessel.se) if you have any comments or questions to this Privacy Policy

## 11. Applicable Law

The applicable Law for the Data Privacy is the EU Law.