

# PRIVACY NOTICE

## 1. INTRODUCTION

ClimateView AB ("**ClimateView**", "**we**" or "**us**") is the controller and responsible for the processing of your personal data, as described in this privacy notice ("**Notice**"). We understand that your privacy is important to you, and we want you to feel that you can trust ClimateView when we process your personal information.

This Notice outlines how ClimateView collects, uses, transfers, or otherwise processes (collectively "**process**") your personal data and is published with the aim to enable you to understand how we process your personal data, why we do so, and to inform you about your data protection rights.

We are responsible for and committed to processing the personal data in accordance with applicable data protection laws, such as the EU General Data Protection Regulation 2016/679 ("**GDPR**") and applicable national legislation. You can get in touch with ClimateView using the contact details set out in section 9 below.

You have a right to information about how we process your personal data. We, therefore, encourage you to read this Notice in full. In light of the volume of information in this Notice, if you only want to access a particular section of this Notice, you can click on the relevant link below to jump to that section:

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## 2. SCOPE

### **This Notice applies when:**

- (i) You visit and interact with us through our website [www.climateview.global](http://www.climateview.global) (the/our “**Website**”) or otherwise interact with us;
- (ii) You use the ClimateOS Platform (the/our “**Platform**”; app.climateview.global/) as an authorised user (“**Authorised User**”);
- (iii) We are in commercial dialogues with you when the organization that you represent is an existing or prospective client of ours;
- (iv) We are in commercial dialogues with you when you represent an existing or prospective partner such as, but not limited to, business, academia, political and research partners;
- (v) You participate in our events.

This Notice applies when we process personal data, that is any information (or combination of such information) that directly or indirectly can identify you as a unique person. Information that can directly identify you is, for example, your name or your email address. Information that can indirectly reveal your identity is, for example, your job role in a specific company or an internal reference number.

Information about legal persons, such as the organisation name or registration numbers, does not constitute personal data, apart from certain specific cases where this information can identify you as a unique person (e.g. when you act as the organisation’s representative as further described in section 0.)

Please note that we will not collect any categories of personal data that are considered special categories of personal data under the GDPR (e.g., information about your racial or ethnic origin or health, political opinions, religious or philosophical beliefs, or trade union membership) or about your criminal background.

### **This Notice does not apply:**

When we are providing our services, we are acting as a processor on our organisational customers’ behalf, that is the specific organization (“**Principal**”) that has assigned you access to our Platform as an Authorised User.

According to the GDPR, a processor is the legal entity that processes personal data on the controller's behalf and under the controller's instructions. In relation to the provision of our services, the Principal is the controller of your personal data and remains ultimately responsible for the processing. For detailed privacy information related to a Principal's processing of your personal data in relation to our services, please contact the Principal in question directly, as their processing of your personal data may vary from what is stated in the table below. Kindly note that we are not responsible for the privacy or data security practices of our customers, which may differ from those explained in this Notice.

### 3. WHAT PERSONAL DATA WE COLLECT AND HOW WE COLLECT IT

Most of the time, we collect your personal data directly from you, such as when you fill in a form on our Website, when you request a demo or copy of our publications, or when you otherwise interact with us. However, we also collect your personal data from other sources, such as information that is publicly available, for example, information about you on your employer's website or social media such as LinkedIn. In certain circumstances, personal data will be generated internally by our systems, such as internal reference numbers.

The personal data we collect, and process can be categorised in the following categories:

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|----------------------------|--|
| <b>Communication data:</b> | <p>This category includes personal data that we collect through our interaction and includes the content of our communications with you, such as:</p> <ul style="list-style-type: none"><li>• Communication content (e.g., email content)</li><li>• Any other relevant information that you will disclose to us, such as your feedback</li></ul>   |
| <b>Contact data</b>        | <p>This category includes personal data that will enable us to get in touch with you, as well as understand a bit more about the organization that you represent, such as:</p> <ul style="list-style-type: none"><li>• Name</li><li>• Business email</li><li>• Business phone number</li><li>• Organisation name, size, and contact details</li><li>• Information if you are a city official</li></ul> |

<b>Preference data:</b>	<p>This category includes personal data regarding your specific preferences when you respond to various forms, such as:</p> <ul style="list-style-type: none"><li>• Preferred language</li><li>• Information about why you chose ClimateView</li><li>• Information about how you heard about us</li></ul>
<b>Signature data:</b>	<p>This category includes personal data collected by you to electronically sign an agreement, such as:</p> <ul style="list-style-type: none"><li>• Business email</li><li>• Your signature</li><li>• Time and date of signature</li></ul>
<b>Technical data</b>	<p>This category includes personal data collected by you or generated by the use of cookies or similar technologies, such as:</p> <ul style="list-style-type: none"><li>• IP address</li><li>• User behaviour</li><li>• Timestamps</li></ul>
<b>Transaction data</b>	<p>This category includes personal data that we are required to collect when we administer and/or manage our accounting, such as:</p> <ul style="list-style-type: none"><li>• Invoice data</li><li>• Transaction reference number</li><li>• Relevant timestamps</li></ul>
<b>User data</b>	<p>This category includes user account data and user-generated data that we collect on behalf of our clients when you are using our Platform, such as:</p> <ul style="list-style-type: none"><li>• Name</li><li>• Business email</li><li>• Access rights</li><li>• Log activity</li></ul>

**Video and  
Photo data**

This category includes the following personal data:

- Your photos
- Recordings of you
- Voice recording

#### 4. WHY AND HOW WE USE YOUR PERSONAL DATA

##### 4.1 When you visit and interact with us through our Website

Purpose	Your personal data processed	Legal basis upon which we process the personal data
To book and provide a demo for you upon your request on our Website.	<ul style="list-style-type: none"> <li>• Contact data</li> <li>• Preference data</li> </ul>	We base the processing on our legitimate interest in responding to your inquiries.
To enable you to download our informational material, such as webinars and white papers.	<ul style="list-style-type: none"> <li>• Contact data</li> </ul>	We base the processing on our legitimate interest to provide you with the requested material.
To respond to your inquiries regarding our services when you fill in relevant forms on our Website or when you contact us via other communication channels.	<ul style="list-style-type: none"> <li>• Contact data</li> </ul>	We base the processing on our legitimate interest in responding to your inquiries about our business operations and communicating with you.
To send you our newsletter.	<ul style="list-style-type: none"> <li>• Contact data</li> </ul>	We base the processing on our legitimate interest in keeping you informed about our business and relevant sectoral news.

## **4.2 Cookies and similar technologies**

When you visit our Website, use our Platform, or visit the external (public) interface of our Platform, if you agree, we will place cookies or similar technologies on your device which will collect and share Technical data with us..

For more information about the types of cookies we use, the personal data categories processed, the purposes of processing and retention time, as well as how you can control cookies, please read the relevant our Cookie Notice:

- Cookie notice for the Website (<https://www.climateview.global/cookie-policy>)
- Cookie notice for the Platform (<https://app.climateview.global/cookie-notice>)
- Cookie notice for the external interface of our Platform

## **4.3 When you use the Platform as an Authorised User**

### **4.3.1 *ClimateView as a processor of your personal data***

Please note that if you are using our Platform as an Authorised User we are processing your personal data on behalf of the Principal who is responsible for assigning access to our services. In such a case, the Principal at hand is the controller of the personal data, therefore for more information about the processing, consult the relevant Principal's privacy notice.

In such cases, we will process your personal data in accordance with the data processing agreements in place between us and the Principal at hand, their instructions as communicated to us from time to time, and applicable data protection law requirements.

### **4.3.2 *ClimateView as the controller of your personal data***

Notwithstanding the above we remain the data controller for certain purposes of processing when you are using our Platform which are the following:

Purpose	Your personal data processed	Legal basis upon which we process the personal data
To improve the quality, functionality, and user experience of ClimateOS.	<ul style="list-style-type: none"> <li>• Contact data</li> <li>• Communication data</li> <li>• Technical data</li> </ul>	We base the processing on our legitimate interest in improving our services.
To improve our services by processing your feedback and contacting you with follow-up questions.	<ul style="list-style-type: none"> <li>• Contact data</li> <li>• Communication data</li> </ul>	We base the processing on your prior consent.
To provide technical support.	<ul style="list-style-type: none"> <li>• Contact data</li> <li>• Communication data</li> <li>• User Data</li> </ul>	We base the processing on our legitimate interest in offering support to our users
To be able to operate the ClimateOS platform, including maintenance and debugging.	<ul style="list-style-type: none"> <li>• User data</li> <li>• Contact data</li> </ul>	We base the processing on our legitimate interest in operating and ensure the proper functionality of ClimateOS.

#### 4.4 When the company that you represent is a ClimateView client or a prospective client

In case you represent an existing client or prospective client of ours, we will process your personal data for the following purposes (in addition to the purposes set out in clause 4.2 above):

Purpose	Your personal data processed	Legal basis upon which we process the personal data
To market our services.	<ul style="list-style-type: none"> <li>• Contact data</li> </ul>	We base the processing on our legitimate interest in marketing our services to persons in key-positions in organisations that we consider would be interested in our Platform or your prior consent depending on the applicable national legal requirements.

To sign relevant agreements with ClimateView.	<ul style="list-style-type: none"> <li>• Contact data</li> <li>• Signature data</li> <li>• Any other personal data that an agreement may contain</li> </ul>	We base the processing on our legitimate interest in ensuring that relevant agreements are in place with our clients.
To manage our relationship with our (existing and prospective) clients and day-to-day operations.	<ul style="list-style-type: none"> <li>• Contact data</li> <li>• Communication data</li> </ul>	We base the processing on our legitimate interest in administering our relationship with the company that you represent.
For billing and invoicing purposes.	<ul style="list-style-type: none"> <li>• Contact data</li> <li>• Transaction data</li> </ul>	We base the processing on our legitimate interest in being able to administer our accounting, as well as on our necessity to comply with legal obligations, such as bookkeeping laws.
To market similar services of ClimateView, including upsells and renewals.	<ul style="list-style-type: none"> <li>• Content data</li> <li>• Communication data</li> </ul>	We base the processing on our legitimate interest in marketing our services to our existing customers.
To publish your feedback about ClimateOS on our Website.	<ul style="list-style-type: none"> <li>• Contact data</li> <li>• Communication data</li> </ul>	We will base the processing on your prior consent.
For internal training purposes, we will record our meetings upon your prior consent.	<ul style="list-style-type: none"> <li>• Video data</li> </ul>	We will base the processing on your prior consent.

#### 4.5 When you are or you are interested in becoming our business partner

Whether you choose to become a referral or solution business partner, we will process your personal data for the following purposes:

Purpose	Your personal data processed	Legal basis upon which we process the personal data
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To identify relevant partnerships, enable you to apply to become our business partner or deliver a demo that you have requested.	<ul style="list-style-type: none"> <li>• Contact data</li> <li>• Preference data</li> </ul>	We base the processing on our legitimate interest in reaching out to potential partners, administering the partnership applications, and responding to your inquiries.
To sign relevant agreements with ClimateView.	<ul style="list-style-type: none"> <li>• Contact data</li> <li>• Signature data</li> </ul>	We base the processing on our legitimate interest in ensuring that relevant agreements, such as partnership agreements, are in place with our clients.
To administer our relationship with you and day-to-day operations.	<ul style="list-style-type: none"> <li>• Contact data</li> <li>• Communication data</li> </ul>	We base the processing on our legitimate interest in administering our relationship with our partners.

#### 4.6 When you participate in our webinars and events

We want to be on top of things, and to do that, we organise various webinars, events, and other activities. During those events, we will process your personal data for the following purposes:

Purpose	Your personal data processed	Legal basis upon which we process the personal data
To process your registration and participation in the events.	<ul style="list-style-type: none"> <li>• Contact data</li> <li>• Communication data</li> </ul>	We base the processing on our legitimate interest to administer and arrange our events.
To take photos and record during those events to spread brand awareness.	<ul style="list-style-type: none"> <li>• Photos and/or Video data</li> </ul>	We will base the processing on our legitimate interest to have the webinars available on-demand and/or use the material to promote similar events.
To contact you after the webinar or event to ask you for your feedback.	<ul style="list-style-type: none"> <li>• Contact data</li> <li>• Communication data</li> </ul>	We base the processing on our legitimate interest to collect your feedback to improve the quality of our webinars and/or events.

#### 4.7 To enable us to comply with legal obligations and defend against legal claims

Purpose	Your personal data processed	Legal basis upon which we process the personal data
To comply with various legal obligations.	In order to comply with applicable laws, we are obliged to process certain personal data. The personal data categories collected and stored for this purpose may vary depending on the specific requirements stipulated in, for example applicable tax, accounting, or book-keeping legislation.	For this purpose, the processing of your personal data is based on our necessity to comply with legal obligations.
<p>To enable ClimateView to establish, exercise or defend legal claims.</p> <p>“Legal claims” in this context is not limited to current legal proceedings but also includes:</p> <ul style="list-style-type: none"> <li>• actual or prospective court proceedings;</li> <li>• obtaining legal advice; or</li> <li>• establishing, exercising, or defending legal rights in any other way,</li> </ul>	For this purpose, we will process any personal data listed in section 0.	We base the processing on our legitimate interest in being able to establish, exercise, and defend against legal claims according to applicable law.

#### 5. RETENTION PERIODS

We retain the personal data we collect from you where we have an ongoing legitimate business need to do so (e.g., to provide you with information you have requested or to exercise or defend legal claims) to comply with applicable legal, tax, or accounting requirements. When we have no ongoing legitimate business need or legal reason to process your personal data, we will either delete or anonymise it.

## 6. RECIPIENTS AND TRANSFERS OF PERSONAL DATA

We disclose the personal data described above to the following categories of recipients:

- (a) Courts and similar judicial entities and/or authorities if we are required to do so by law.
- (b) Our affiliates.
- (c) Our business partners.
- (d) Service providers upon which we rely for our core operational activities.
- (e) If there is a change of ownership of our business, we will share the personal data with the new owners so that they can continue to operate our business, provided that the new owners will only process personal data as we have set out in this Notice.

Our processing of personal data, either directly by us or through our service providers, in certain cases constitutes a transfer of your personal data to countries outside the EU/EEA ("**Third Countries**"). In such cases, we ensure that adequate safeguards are in place to require that your personal data remain protected in accordance with this Notice and applicable data protection laws. We will do this through one of the following measures:

- (i) By transferring the personal data to a country that is on the European Commission's list of Third Countries with an adequate level of protection, or;
- (ii) By implementing a valid transfer mechanism (such as controller-to-controller or controller-to-processor standard contractual clauses that have been approved by the European Commission), as applicable from time to time, for the transfer of personal data to Third Countries that are not on the EU Commission's list as described in point (i).

If a standard contract is deemed ineffective due to national law of the country of destination, we will take additional technical, organisational, or contractual measures to ensure an adequate level of protection when transferring personal data to countries covered by paragraph (ii) above.

You can find out more information about the transfers and the safeguards we implement to protect your personal data by contacting us at [privacy@climateview.global](mailto:privacy@climateview.global).

## 7. YOUR RIGHTS

According to the GDPR, you have various data protection rights that you can exercise, including the right to be informed in accordance with this Notice. Once we receive a request from you, we will respond as soon as possible, and in any case, within the deadline stipulated in applicable legislation. Kindly note that before taking any action, we will ask you to verify your identity.

The table below provides a summary of these rights including information on possible conditions and limitations on how each right can be exercised and executed.

YOUR RIGHT	WHAT DOES IT MEAN	HOW YOU CAN EXERCISE YOUR RIGHT	CONDITIONS AND LIMITATIONS
<b>Right to access</b>	You have the right to access and receive a copy of your personal data that we process, as well as other supplementary information at any given time.	Such requests should be made to <a href="mailto:privacy@climateview.global">privacy@climateview.global</a> . If possible, please specify the type of information you would like to access to ensure that our disclosure meets your expectations.	Your request may not affect the rights and freedoms of other individuals, such as their privacy and confidentiality rights.
<b>Right to rectification</b>	You can challenge the accuracy of your personal data at any given time. Depending on the purpose of the processing you can request the completeness of your personal data. If your personal data is indeed inaccurate, you are entitled to have the inaccurate data removed, corrected, or completed, as appropriate.	We encourage you to notify us of any inaccuracies regarding your personal data as soon as they occur, including changes to your contact details.  A request to exercise this right is made in writing to <a href="mailto:privacy@climateview.global">privacy@climateview.global</a> .	If appropriate, we may ask you to provide a supplementary statement, depending on the purpose of processing.

<b>Right to erasure</b>	In certain cases, you are entitled to have your personal data erased (also known as the “right to be forgotten”), such as in cases where the personal data is no longer needed for the purpose for which it was collected, or if we no longer have a legal basis to continue processing it.	A request to exercise this right is made in writing to <a href="mailto:privacy@climateview.global">privacy@climateview.global</a> .	Kindly note that this right is not absolute and there are various lawful reasons why we may not be in a position to erase your personal data, for example: (i) where we have to comply with a legal obligation, (ii) in case of exercising or defending legal claims, (iii) where there is another lawful purpose for processing your personal data at hand.
<b>Right to objection</b>	<p>You have the right to object to the processing of your personal data at any time. This means that we will stop or be prevented from processing further your personal data.</p> <p>You have the absolute right to object to receiving further marketing material or communications from us.</p>	<p>A request to exercise this right is made in writing to <a href="mailto:privacy@climateview.global">privacy@climateview.global</a>.</p> <p>If possible, please specify to which purpose of processing you wish to object to ensure that our actions meet your expectations.</p>	This right is only applicable where the processing is based on our legitimate interest which does not override your rights and freedoms. For more information see section 0.

<b>Right to restriction</b>	By exercising this right, you limit the way we will process your personal data for a certain period of time. This right is an alternative to requesting the erasure, in case you don't want deletion of your personal data.	<p>A request to exercise this right is made in writing to <a href="mailto:privacy@climateview.global">privacy@climateview.global</a>.</p> <p>If possible, please specify for how long you would like to restrict the processing, to ensure that our actions meet your expectations.</p>	<p>You have the right to request you restrict the processing of their personal data in certain circumstances, such as:</p> <ul style="list-style-type: none"> <li>i. If you have contested the accuracy of your personal data.</li> <li>ii. If you consider that your personal data has been unlawfully processed and you oppose to erasure of your personal data.</li> <li>iii. When we no longer need the personal data, but you need to keep it in order to establish, exercise, or defend a legal claim.</li> </ul>
<b>Right to withdraw your consent</b>	You have the right to withdraw your consent to any processing for which you have previously given consent at any given time.	A request to exercise this right is made in writing to <a href="mailto:privacy@climateview.global">privacy@climateview.global</a> .	If you withdraw your consent, it will only take effect in regard to future processing.

If you have any comments or complaints regarding our processing of your personal data, please contact us directly by using the contact information in section 9.

You also have the right to contact and lodge a complaint with the Swedish Authority for Data Protection Authority ("IMY"), which is the supervisory authority for the processing of personal data. IMY can be reached at:

**Integritetsskyddsmyndigheten**

Box 8114, 104 20 Stockholm

Email: [imy@imy.se](mailto:imy@imy.se)

Phone number: 08-657 61 00

IMY's website: [www.imy.se](http://www.imy.se)

Kindly note that IMY requires that you exhaust our internal complaint process before looking into your complaint.

**Your rights relating to the use of our services:**

As already described above, we will also process certain personal data on the Principal's behalf that has granted you access to our Platform. In such case, if not stated otherwise in this Notice or in a separate disclosure, we process such personal data as a processor and the Principal at hand is the controller of such personal data. Kindly note that if your data has been submitted to us in our role as a processor and you wish to exercise any rights you may have under applicable data protection laws, please inquire with the respective customer directly. However, if you still wish to submit a request to exercise your rights directly to us, please make sure that you provide us with the name of the Principal who submitted your data to us. We will refer your request to that customer and will support them as needed in responding to your request within a reasonable timeframe.

**8. CHANGES TO THIS NOTICE**

If we make changes to this Notice, we will notify you on our Website. You can see when this Notice was last updated by checking the “last updated” date displayed at the top of this Notice. Significant changes to how we collect or process your personal data will be notified to you via email.

**9. CONTACT INFORMATION**

Our contact information is:

Name: ClimateView AB (Organisation number: 559150-4120)

Address: Jakobsbergsgatan 24, 111 44 Stockholm, Sweden

Email address: [privacy@climateview.global](mailto:privacy@climateview.global)