

Corsmed Privacy Policy

2020-11-18

Your privacy is important, both for you and for us. We will do our very best to ensure that the data you let us process is handled in a secure way, with your integrity in focus. This privacy policy describes what data we collect, how and why we use it and where you can find out more.

Any capitalized words used but not defined herein, shall have the same meaning ascribed to them in the Terms & Conditions available at <https://corsmed.com/legal> (the “**Terms**”). The following capitalized words have the following definitions:

"Account" means the account you create or that we create for you to access the Services and Software, identifiable by email;

"Customer" means the individual or entity who purchases one or several Licenses to use a Paid Version (whether or not you are a User);

"Free User" means the individual or entity who has signed up for a License to the Demo Version;

"Team Member" means the individual(s) or entity(ies) who are part of a Team Workspace;

"Team Workspace" means the group that Corsmed will automatically create when a Customer purchases more than one License

"User" means any person, such as a Customer, Free User or Team Member, who has signed up for an Account or in any other way use the Services;

"Websites" means corsmed.com and education.corsmed.com as well as any other sites related to corsmed.com and education.corsmed.com, including subsites or versions of them connected to help/support you to use the Software

Whose data do we collect?

What data we collect depends on how you interact with us and, based on the main ways to interact with us, “you” are most likely:

- a **"User"**, who has signed up directly with Corsmed for a Full Version or Demo Version, or received a Full Version or Demo Version from an organisation the User is part of;
- an **"Administrator"**, who administers Users;
- an **"Organization Contact Person"**, who is Corsmed’s point of contact at an organization;
- a **"Visitor"** who visits any of our Websites, attends webinars, sends us emails, participates in surveys or in any other way interacts with us or uses parts of our Services without having signed up with Corsmed.

What data do we collect?

Depending on who you are, we collect the following categories of personal data:

- **Contacts** – such as your name, email address, billing address.
- **Interaction Information** – meaning information on how you use the Services and your system activities (dates, times and details of log-on and log-off including information on

your history with Corsmed; technical data such as page response times, download errors, personal preferences; your interactions with the customer service, etc.

- **Device Information** – e.g. IP address, user agent, browser settings, operating system and platform and screen resolution. We may, for example, use an IP address received from your browser or device to determine approximate location.
- **Third-Party Information** – in your interaction with our Services we use third-party sites or platforms to collect some information that enables us to give you relevant communication.
- **Additional Information** – means other information, when and to the extent submitted to our Websites or if you, for example, participate in a focus group, contest, request support, leave reviews or otherwise communicate with Corsmed.
- **Cookie Information** – Please see our [Cookie Policy](#) for more information.

You are (unless you are a Team Member in which case your organization, as our Customer, is) liable for personal data included in information submitted by you in your use of the Software (e.g. the documents, text and pictures you have submitted electronically). Corsmed will only store such personal data to the extent provided by you or as a result of your use of the Software.

How do we process your data?

The typical situations when we process your data are listed below, divided depending on who you are.

USERS

We may process:	with the purpose to:	and the legal basis being:
Contacts, Device Information	set up your Account with your identifying information	contractual obligations
Contacts, Device Information, Third Party Information	communicate with you and/or provide you support through phone, chat or email	contractual obligations
Contacts and Device Information	send you invoices	contractual obligations
Contacts, Device Information, Interaction Information, Third Party Information and Cookie Information	conduct monitoring and incident / issue tracking, such as to troubleshoot the Services, detect errors and other issues	contractual obligations
Contacts, Device Information and Interaction Information	detect multi-use, fraudulent behaviour and other acts in violation of the Terms	contractual obligations
Contacts, Device Information and Cookie Information	provide appropriate security measures	contractual obligations
Contacts, Device Information and Interaction Information	conduct research and service improvements through, for example, A/B testing, data analytics and other types of testing / optimization exercises	legitimate interest
Third Party Information	conduct marketing activities	legitimate interest

Contacts	conduct sales and marketing - when you have signed up with an email address that belongs to an organization, we may disclose your email address to that organization as a part of our marketing & sales towards potential or existing Customers (see "Customer access" for more information)	legitimate interest - if you would like to avoid this type of disclosure you should register an Account with your own personal email address
Contacts	conduct direct marketing via email	your consent
Cookie Information	conduct marketing activities and provide appropriate security measures, as examples, please read our full Cookie Policy for more information	your consent

ADMINISTRATORS

We may collect all the personal data for the purposes described above under Users with the addition of the below:

We may process:	with the purpose to:	and the legal basis being:
Contacts	set up a workspace or dashboard that you can administer to monitor Users connected to you	contractual obligations

ORGANIZATION CONTACT PERSONS

We may process:	with the purpose to:	and the legal basis being:
Contacts	communicate with you and provide support	legitimate interest
Contacts and Device Information	send you invoices	legitimate interest
Contacts	maintain a good record keeping in the day-to-day business activities	legitimate interest
Contacts	conduct direct marketing via email	with your consent
Cookie Information	conduct marketing activities and provide appropriate security measures, as examples, please read our full Cookie Policy for more information	legitimate interest and your consent

VISITORS

We may process:	with the purpose to:	and the legal basis being:
Contacts and Additional Information	e.g. host webinars, surveys and focus groups	your consent
Third-Party Information	conduct marketing activities	legitimate interest

Contacts and Device Information	send you invoices (if you have requested an invoice on behalf of another person)	legitimate interest
Contacts (email address)	communicate	legitimate interest
Contacts (email address), Device Information, Interaction Information and Cookie Information	conduct research and service improvements through, for example, A/B testing, data analytics and other types of testing / optimization exercises	legitimate interest
Cookie Information	conduct marketing activities and provide appropriate security measures, as examples, please read our full Cookie Policy for more information	your consent

Payment related data

We use Stripe (Stripe Payments Europe, Ltd.) who is a compliant third-party vendor to process credit card payments for invoicing. We never store, handle, or access any payment related data other than described herein. We may collect some limited information, such as your email address and transaction history. In addition, Stripe generally provides us with limited information related to you, such as a unique token that enables you to make additional purchases using the information they've stored, and your type of card, expiry date and last four digits as well as IP address and VAT number, where applicable. If you choose to pay by invoice, we may need to collect and transfer additional information, like your company name, registration number and phone number, to our invoicing service provider to enable credit checks and send you invoices. Stripe is controllers and responsible for the personal data that they collect. The use of your data by our invoicing service providers is subject to their own privacy policies.

Webinars and surveys etc.

From time to time, we may offer you the chance to participate in webinars and surveys which may be governed by the Terms and this Privacy Policy or, if explicitly stated, by a specific separate privacy policy with specific terms. If you choose to participate, we may ask you for certain personal data in addition to what is stated in this Privacy Policy.

We may also cooperate with third parties to, for example, host webinars, and in the event such third parties ask you to provide them with your personal data to provide you with their services, and you agree to do so, that third party's terms and conditions and/or policies apply to their services and we recommend that you get to know them before you participate in any webinar (or whatever it may be) hosted by a third party. They are responsible for the personal data they collect to provide you with their services.

We may ask you to be part of surveys, regarding for example customer satisfaction, and with your consent give us feedback in relation to for example support matters or when we test new stuff for improvement purposes and sometimes this may include processing of personal data of you as the respondent.

For how long is my data stored?

We store personal data as long as needed for the purposes described in this Privacy Policy but please note that we may store personal data for a longer period of time if it is needed to fulfil a legal obligation bestowed on us.

You may delete your contacts and other personal data including the entire Account on request by email to info@corsmed.com. We will comply with your request promptly and at the latest within 30 days. If you are part of a Team Workspace as a Team Member, contact the Administrator if you wish to deactivate your Account and if you wish to request the removal of your personal data, we will help you, but please request our assistance via the Administrator of the Team Workspace.

Other situations when your data may be processed, shared, or disclosed

Notifications.

If you have subscribed to be notified of changes to our Policies, or other notifications such as updates to our Software or Services, we will use your email address to communicate with you.

Customer access.

If you use an email address to access the Services and that email address was provided by an organization, such as an employer or school, that organization can request information about your Account as well as, if that organization is a Customer, request us to move your Account to that organization's Team Workspace in which case you will become a Team Member. The organization may then apply its own policies to your use of the Services and control, administer, suspend, and delete access to your Account. Please see the Terms for more information on what happens when you use an email address provided by an organization to access the Services. If you would like to be sure to avoid this type of disclosure you should register an Account with your own private email address (you can also change a registered email when you are logged in).

During a change to Corsmed's business.

If Corsmed engages in, for example, a merger, acquisition, bankruptcy, dissolution, reorganization, sale of some or all of Corsmed's assets or stock, financing or similar transactions or proceedings, or steps in contemplation of such activities (e.g. due diligence), some or all your personal data may be shared or transferred, subject to standard confidentiality arrangements.

Aggregated or de-identified data.

We may disclose or use aggregated or de-identified data for any type of business-related purpose such as with prospects, partners for business or research purposes.

To enforce our rights, prevent fraud, and for safety.

We reserve the right to disclose all kinds of data to protect and defend the rights, property, or safety of Corsmed or third parties, including enforcing contracts or policies, or in connection with investigating and preventing fraud or security issues.

To comply with laws.

If we receive a request for information, we may disclose all kinds of data, if this is required by mandatory applicable laws, governmental regulations, rules or by any order of court of competent jurisdiction, arbitral tribunal or governmental authority.

With consent.

We may share personal data and other data with third parties when we have consent to do so.

Third-Party Service Providers

We engage third party companies or individuals as service providers or business partners to process your Account to support our business. These third parties are our processors and

may, for example, provide and help us with computing and storage services. From time to time, we may remove or engage new processors and when we do Corsmed will ensure via a written contract that the processor may access and use your data only to deliver the services Corsmed has retained them to provide and is prohibited from using such data for any other purpose. Corsmed will ensure that processors are bound by written agreements that require them to provide at least the level of data protection required of Corsmed.

Regarding eventual data transfers outside of the EU/EEA

Following the provisions of the GDPR, we ensure that transfers of your personal data outside of the EU and the EEA (i.e. a “third country”) are carried out in a safe and legal manner. Such transfers are made to countries which, in accordance with a decision of the European Commission, have an adequate level of protection. An updated list of countries currently included in such a decision may be found on the European Commission’s website:

https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en

Alternatively, we will ensure that appropriate safeguards are in place between us as data exporter and the third country data importer. Such appropriate safeguards are, subject to the transfer itself, constituted of us having entered into an agreement containing either contractual clauses or standard contractual clauses which are binding between us and the third country data importer and in accordance with the relevant provisions of the GDPR and other applicable data protection provisions.

Our utilization of standard contractual clauses are subject to having been approved by the European Commission. Currently applicable versions may be found using the web addresses provided below:

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:32001D0497>,

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32004D0915>,

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32010D0087>

Furthermore, appropriate safeguards can also mean that we utilize binding corporate rules within either a group of undertakings or a group of enterprises engaged in a joint economic activity if these have been approved by the competent authorities. We may also employ an approved code of conduct in accordance with art. 40 GDPR - and in accordance with the requirements set out in art. 46.2 (e) GDPR or utilize an approved certification mechanism pursuant to article 42 GDPR - and in accordance with the requirements set out in art. 46.2 (f) GDPR.

In specific situations where neither an adequacy decision nor any of the above appropriate safeguards are applicable for such a transfer, we may also conduct a third country data transfer in accordance with an applicable derogation as stated within art. 49 of the GDPR.

For more information on our data transfers to so called third countries you will find our contact details provided below. Please also consider the information provided through the attached link below:

<https://www.datainspektionen.se/other-lang/in-english/the-general-data-protection-regulation-gdpr/transfer-of-data-to-a-third-country/>

Corsmed uses processors to deliver the best Services possible to you, we do not sell personal data to processors.

Your rights

- **Right to be informed.** You have the right to be informed about how we process your information. We do this through this Privacy Policy, other information on our website, and by answering questions sent to us.
- **Right to access your data.** You may request a copy of your data by email to info@corsmed.com if you would like to know what personal data we process about you. This copy of your personal data can also be supplied in a machine-readable format.
- **Right to rectification.** You have the right to correct inaccurate or incomplete information about yourself which you can do either by managing your Account and the content contained in it through your account settings page or, in relation to personal data not manageable by the account settings page, by email to info@corsmed.com.
- **Right to erasure.** You have the right to request deletion of your personal data, for example when it is no longer necessary for us to process the data for the purpose it was collected, or when you have withdrawn your consent, which you request by email to info@corsmed.com. In the event that you are a Team Member, we suggest that any request regarding personal data is sent to us via the Administrator of the Team Workspace.
- **Right to restrict processing of your data.** If you believe your information is incorrect or you believe we use your data unlawfully, you have the right to ask us to stop or limit the processing, which you request by email to info@corsmed.com.
- **Right to lodge a complaint.** You have the right to lodge a complaint with your national supervisory data protection authority, or the Swedish Data Protection Authority (the "DPA"). Complaints to the DPA can be made [here](#).
- **Controlling account service settings.** You can always access and control the contents of your Account by logging into your Account.

We will get back to you promptly and at the latest within 30 days after receipt of your request, but please note that Corsmed may be required by law to keep some personal data despite your request.

You may revoke your consent

In cases where we process your personal data based on your consent or explicit consent, you can at any time revoke this consent, which you do by unsubscribing to emails we send you or by contacting us at info@corsmed.com (please see our Cookie Policy if you want to revoke consent to cookies). Revoking consent for the purpose of direct marketing via email will not lead to any detriment for you, as we do not require this type of information to provide our Services, but if you revoke your consent in relation to other matters, exercise your right to erasure or restrict our processing of your personal data in any other way, our Services can no longer be provided.

Age limit

The Services are addressed to organizations and individuals being sixteen years of age or older. By registering an Account, you warrant and represent that you have that legal age as further described in the Terms.

Contact

Corsmed AB is a Swedish limited liability company with registration number 559093-1779 and registered in Stockholm, Sweden. You can always reach us at info@corsmed.com.

Responsible Supervisory Authority in Sweden

Should you believe that our processing of your personal data is incompatible with legal requirements or otherwise incorrect you have a right to lodge a complaint with a supervisory authority. In Sweden, this supervisory authority is made up of the Swedish Data Protection Authority (SW: Datainspektionen).

Changes to this Privacy Policy

This Privacy Policy is not part of the Terms and we may change this Privacy Policy from time to time. Laws, regulations, and industry standards evolve, which may make those changes necessary, or we may make changes to our business. We will post the changes to this page and encourage you to review our Privacy Policy to stay informed. If we make changes that materially alter your privacy rights, we will provide additional notice through the Services or via email if you have subscribed for notifications in the link set out below. If you disagree with the changes to this Privacy Policy, you should delete your Account.