

PRIVACY POLICY

Last updated: 14 September 2021

Momang is committed to protecting your privacy. We collect and use your personal data responsibly and with your privacy in mind. We use your personal data to provide our ecosystem for consultant and knowledge based delivery and associated services.

This Privacy Policy applies to data provided via our website momang.io (the "Site"), the Momang application (the "App"), and the content and the services offered by Momang through the Site and App (collectively, the "Services"). This Privacy Policy describes how we collect and process your personal data when you use the Services and your rights in relation to our use of your personal data, and how to exercise those rights.

By visiting the Site, using the Services, and by clicking the button to indicate your agreement when first registering or logging into the App and/or you are accepting and consenting to us collecting your personal data and using it in accordance with this Policy.

You may withdraw your consent at any time as set out in the "Your rights" section below.

"Momang", "we", "our" or "us" means Momang AB which is registered with the Swedish companies registration office (Org nr 559296-1493) and address is Barnhusgatan 3, 111 23 Stockholm, Sweden.

For the purposes of EU data protection law, we are a data controller in respect of the personal data entered by you into the Services, and we are responsible for ensuring that we use your personal data in compliance with applicable data protection laws.

In relation to data provided to us by our business clients to enable us to provide the Services, the relevant business client will be the data controller and we will be the data processor. Such clients warrant in our agreements with them that they have complied with and shall continue to comply with applicable data protection laws in relation to the data they control and pass to us and that they have the necessary consents to use the data in relation to the Services we provide to them.

1. Data we collect Momang collects the following personal data:

Contact and identification information: data provided by you, when register for the App and use any of the Services by filling in a field or forms in our App or Site including name, email and password, and optional information such as a profile photo;

Usage of Services: data provided through the use of the Services, for example, the profiles you create, comments on those profiles, uploaded personal information, or any other details entered into our App or the Site;

Social media and surveys: data provided by you or our clients when subscribing to our emails, participating in discussion boards or other social media functions linked to the Services, including responding to surveys;

Subscription information: data provided by our clients when updating their subscription preferences.

Customer Support and sales: data you or our clients give our Sales, Customer Success, or Customer Support teams when you or they report a problem, request our support services, request or complete a review, register to use the Services or any demo or other trial of the Services, or data provided when you correspond with us;

Third party services: data transferred via any other software services integrated with the Services;

Payments data: payment data collected when our clients subscribe for paid Services including credit card number and billing address;

Cookies: data automatically collected when using the Site, such as cookies;

Device information and unique identifiers: data automatically collected when using the Services, including:

the data we need access to on your device in order to deliver the Services, such as input device identifiers.

technical data, such as the make, model and operating system of your device, a device identifier, device status, your IP address, browser type, access times and referring web site addresses;

usage data, as collected via analytics services; and

Customer feedback: data provided via other sources, for example, customer feedback.

1. How we use your data Momang limits the personal data collected and processed for the following purposes:

to provide, operate, support use of, maintain and improve the App, Site and the Services;

to carry out our obligations arising from any contracts entered into between our clients and us and to provide you with the Services;

to provide automatic responses for certain Services, like welcoming messaging to the App or Site, and default customer support answers and to notify you or our clients of Momang service updates, incidents, and product features and news (please note that as automatic responses are considered an essential part of the provision of the Services it is not possible to unsubscribe from them whilst using the Services);

to notify you or our clients about changes to the Services and to provide and deliver any other products and services that you or our clients request;

to ensure that content from our App and Site and the Services is presented in the most optimal way for you and for your device;

to provide you with information about other products and services we offer;

to create anonymised high-level research reports on workplace trends in a given verticals, industries, roles, geographies, or to compare industries and/or geographies on key metrics;

to protect against, investigate and deter fraudulent, unauthorised or illegal activity; and

to comply with applicable laws and protect our legal rights.

1. Lawful basis for processing Our processing of personal data depends on which Services you use. Momang processes your personal data for the purposes listed below based on the legal bases stated for each purpose.

Purpose of the processing

Legal basis for processing

Creating and managing your user account

Administering the user or business client relationship

Fulfil contractual obligations.

Providing subscribed for services

Fulfil contractual obligations.

Providing customer service

Preventing IT attacks toward the Services, to further our efforts to keep the Services safe and secure.

Perform research and analysis aimed at improving our products, services and technologies, including sending you surveys.

Display content and features that are customized to your preferences.

To run contests, select entrants, and choose prize winners.

To communicate with you about the Services including service related communications, for example, welcome emails and transactional confirmations.

Marketing including: (a) deciding which marketing to provide to you; (b) marketing and offers regarding our Services to you, subject to your ability to opt out by contacting us.

Transferring your data to suppliers and other recipients.

This will vary depending on the recipients. For example, Momang has a legitimate interest to use third party suppliers to help provide the Services and may be under legal obligations to share data with governmental authorities.

For research and improvement of the Services including: (a) enabling performance of internal research and statistical analysis (b) anonymising your personal data for product development to analyse user behaviour and perform trend analysis (b) performing data analysis for product improvement and product testing.

Compliance purposes including: (a) complying with applicable laws, for example, tax and accounting regulations (b) protecting against legal claims and enforcing Momang's legal rights.

Complying with laws to protect against legal claims and enforcing legal rights.

Conducting customer surveys relating to the Services by email (subject to you being able to opt-out when your email is used for surveys).

- We ensure that processing performed for these purposes is necessary to fulfil our legitimate interests, and that this outweighs your interest in not having your personal data processed for this purpose.
- Disclosing personal data Momang does not sell, rent or lease its customer or end users lists to third parties. Momang share your personal data and usage data with the following third parties (such third parties are prohibited from using your personal data except to provide these services to Momang):

Momang's operational service partners in order to operate the App and the Site and deliver the Services, for example, cloud infrastructure services;

trusted partners to help us perform statistical analysis, marketing campaigns, PR campaigns, send you emails or provide customer support;

any existing or future member of its group, which means any of its subsidiaries, its ultimate holding company and their subsidiaries.

Momang will not disclose your personal data and/or usage data to any other third parties without your consent unless required to do so by law or in the good faith belief that such action is necessary to:

comply with the law or with legal process served on Momang;

protect and defend the rights or property of Momang; and

act under exigent circumstances to protect the personal safety of users of the App and/or the Site.

Please keep in mind that if you publicly disclose personal data and/or usage data through our App or our Site, we are not responsible for the security of the personal data you publicly disclose and it may be collected and used by others.

5. 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 the Site and in the App, and by responding to questions that you sent to us.

Right to access your data. If you would like to know what personal data we process about you you may request a copy of your data.

Right to erasure. You have the right to request deletion of your personal data, for example, when you have withdrawn your consent, or when it is no longer necessary for us to process the data for the purpose it was collected. You may delete certain data in the App or on the Site or by contacting info@momang.io. Please note that Momang needs to comply with certain legal obligations that may prevent us from immediately deleting some of your personal data.

Right to rectification. You have the right and ability to change any inaccurate or incomplete data about yourself by making changes directly in the App or on the Site or by contacting info@momang.io.

Right to restrict processing of your data or object to processing. If you believe your information is incorrect or that we use your data unlawfully, you have the right to ask us to stop the processing. You may also object to our processing where you believe there are circumstances that would make such processing unlawful. In addition, you may always object to us using your data for direct marketing.

Right to portability. You have the right to request a copy of your data in a machine readable format and can do this by contacting info@momang.io.

Right to withdraw consent. You may withdraw your consent at any time in relation to any of your personal data that we process based on your consent or explicit consent.

Right to lodge a complaint. You have the right to lodge a complaint with the Datainspektionen which is the Swedish Data Protection Authority or if you prefer with your national supervisory data protection authority.

Controlling settings. Momang provides you with the ability to customize your preferences for certain Services in the App. We will always respect your choices.

If you have any query regarding the handling of your data it should be made in the first instance to info@momang.io, addressed for the attention of our Data Protection Officer.

1. International transfers The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by subcontractors or staff operating outside the EEA who work for us or for one of our suppliers. The third-party subcontractors and suppliers may, for example, be software and data storage providers, business consultants or be engaged in the development of the Services, provision of payment processing services and the provision of support services.

We ensure that an adequate level of protection is maintained, and that suitable safeguards are adopted in line with applicable data protection legislation requirements, such as the GDPR, when we transfer your data outside the EU/EEA. These safeguards consist of ensuring that the third party country is subject to an adequacy decision by the European Commission, implementing the European Commission’s standard contractual clauses or ensuring that the recipient is registered with the US Privacy Shield (or any replacement thereof).

When first registering or logging into the Services and by submitting your personal data, you consent to the transfer, storage or processing of your personal data with our business partners located outside of the EEA.

1. **Retention of data** We will retain your personal data for as long as necessary to fulfil the respective purpose of our processing described in this Privacy Policy. We will also retain your personal data as necessary to comply with applicable mandatory legal obligations or rights (such as bookkeeping regulations) to resolve disputes, and to enforce our agreements. This means that even though we stop processing your personal data for one purpose, we may still need to keep your personal data, if the data is needed for another purpose, using it only for that other purpose.
2. **Security** We follow generally accepted industry standards to help protect personal data and take adequate technical and organizational security measures to ensure that your personal data is not misused, lost or unlawfully accessed. Our risk management and security controls include:

consent and permission management for both you and/or your employer;

embedding data privacy by design into everything we do;

limiting access to personal data to those of our employees and subcontractors who require it to provide the Services to you;

storing personal data in secure computer systems which protect it from unauthorized access or use.

requiring employees to enter into obligations of confidentiality to protect customer and other confidential information;

ensuring that third-party service providers enter into obligations of confidentiality to maintain the confidentiality of personal data and not to use it for any unauthorized purposes;

risk management, business continuity, including disaster recovery, backups, business impact assessments and risk registers;

data breach management in accordance with applicable laws;

securing Momang's office facilities; and

network segregation and penetration testing.

No method of transmission over the internet, or method of electronic storage, is 100% secure. As a result, while we strive to protect personal data, we cannot guarantee its absolute security

Your password enables you to access certain parts of our App or the Site. You are responsible for keeping this password confidential and for updating it regularly. We ask you not to share a password with anyone. Should you forget your password, it is your responsibility to request a new password from us.

1. Profiling and automated decision making Momang does not systematically monitor individuals based on personal data or conduct automated processing that has legal or similarly significant effects for you or use automated profiling of user data.
2. Minors Momang's Services are not directed at persons under the age of 18 and Momang does not knowingly collect personal data from persons under the age of 18. If a parent or guardian becomes aware that his or her child has provided us with personal data without their consent, he/she/they should contact Momang at info@momang.io. If Momang becomes aware that a child under 18 has provided us with personal data, Momang will take steps to delete such data.
3. Change of ownership or investments Personal data may be disclosed and otherwise transferred to an acquirer, successor or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets.
4. Cookies A cookie is a small text file that a website saves on a user's computer. The text file contains data the website may use when the visitor returns to the website. Momang.io may use cookies to collect and use data from its visitors in the manner explained below. In the public area of Momang.io domain Momang may gather information about the visit (page views, time, IP, browser, referring URL etc.) and information provided by the visitor in any of the website forms.

Such data may be used by Momang: (a) for website statistics and analytics; (b) to personalise the website when a visitor returns (for example, language preference, customisations); (c) for marketing purposes (for example, ads, email campaigns).

If you do not wish Momang.io, or one of the services we use, to collect any information about your visit you may enable the "Block cookies from third parties and advertisers" option in your web browser settings. This will still allow some "non-tracking" cookies to be stored on your computer, such as language preferences. You may also disable cookies altogether in your browser settings. This will, however, limit your web browsing experience and even stop some web services from working.

1. Other privacy policies If you are employed by Momang, or applying for a job at Momang, other privacy terms apply to Momang's processing of your personal data for these purposes. You will be provided the relevant information in

connection to your contact with Momang or may otherwise request a copy of the relevant privacy terms by using the contact details in this Policy.

2. Links The Site may contain links to make it easier for you to visit other websites. These websites are managed by third parties and Momang encourages you to review the privacy statements of websites you choose to link to from the Site so that you can understand how those websites collect, use and share your information. Momang is not responsible for the privacy statements or other content on websites it may link to.
3. Changes to our Privacy Policy Momang may revise this Privacy Policy from time to time and the most current version will always be posted on the Momang website, and, where appropriate, the changes will be notified to you by email to the address associated with your account. Please check back frequently to see any updates or changes to our Privacy Policy. If you continue to use the Services after you have been notified that a revision has become effective, you agree to be bound by the revised Privacy Policy. If you do not agree to the new Privacy Policy, you should immediately stop using the Services.