

PRIVACY POLICY FOR NAVINCI DIAGNOSTICS AB

NAVINCI DIAGNOSTICS AB SAFEGUARDS YOUR PERSONAL INTEGRITY

Navinci Diagnostics AB, corp. reg. no. 556663-6998, c/o Uppsala University, BMC D11, plan 1, Husargatan 3, 752 37 Uppsala (the "**Company**") respects your privacy and is committed to maintaining a high level of security and integrity regarding your personal data. The Company is also committed to ensuring that processing is carried out in accordance with applicable data protection legislation.

This Privacy Policy describes how the Company processes personal data about you in your capacity as a representative of a company that is a customer or supplier or a potential customer or supplier to the Company, or as a visitor of our website <https://navinci.se/>, or when you apply for employment with us. Further, this Privacy Policy describes how the Company processes personal data about you as a shareholder or as a representative of a shareholder or as a holder or a representative of a holder of other financial instruments that can be converted to or that entitle to subscribe for shares in the Company ("**Shareholder**").

Do not hesitate to contact us should you have any questions regarding the Company's privacy protection. The Company's contact information is set out under the section "Contact Information".

CONTROLLER AND PRIVACY OFFICER

The Company is the controller of your personal data and is therefore responsible for ensuring that your personal data is processed correctly and securely in accordance with applicable legislation.

WHICH PERSONAL DATA DOES THE COMPANY PROCESS?

Personal data means any information that directly or indirectly relates to a natural, living person. Accordingly, personal data is information about you and your person, e.g. your name, your contact information, pictures of you and your IP-address.

Processing means any operation which is performed on personal data, such as collection, storage, use, adaption or disclosure.

Customers, suppliers and partners

The Company collects and stores the following information about you that the Company needs to contact you and to fulfil its undertakings toward you as a customer, supplier or partner.

- Personal information and contact information, such as name, personal identity number, address, telephone number and email address.

- Information that you provide to the Company by email, via the Company's social media or by other channels of communication.
- Information from customer surveys and customer evaluations.
- Payment and purchase history.
- Customer, supplier, and/or collaboration agreements.
- Payment information, such as bank information, account number and, where applicable, IBAN, SWIFT etc.
- Information regarding complaints and warranty matters.
- Where applicable, information regarding phone calls with the Company's switchboard or customer service.
- Where applicable, information regarding dietary preferences, potential allergies and/or disabilities (e.g. in connection with corporate events or meetings).

Company representatives for e.g. customers, suppliers and partners

The Company collects and stores the following information about you that the Company needs to contact you in your capacity as a representative for a company or organisation.

- Personal information and contact information, such as name, address, telephone number, email address, title, position and employer.
- Information that you provide to the Company by email, via the Company's social media or by other channels of communication.
- Where applicable, information regarding phone calls with the Company's switchboard or customer service.
- Where applicable, information regarding dietary preferences, potential allergies and/or disabilities (e.g. in connection with corporate events or meetings).

Potential customers, suppliers and partners and company representatives for potential customers, suppliers and partners

The Company collects and stores the following information about you in your role as a potential customer, supplier or partner to the Company or in your role as a representative for a company that is a potential customer, supplier or partner to the Company. The Company needs such information to contact you and to fulfil its undertakings toward you as a potential customer, supplier or partner or in your capacity as a representative for a potential customer, supplier or partner.

- Personal information and contact information, such as name, address, telephone number, email address, title, position and employer.

Visitors of the Company's website

In connection with visits to the Company's website, the Company collects the following information about you that the Company needs to be able to improve, streamline, simplify and develop our website.

- Technical data, such as IP address, MAC address, URL, unique device ID, network and device performance, browser, language and identification settings, geographic location, operating system, other information from cookies or similar mechanisms (device information).

Recruitment (job applicants at the Company)

The Company collects and stores the following information about you that the Company needs to be able to recruit the right persons for positions with the Company.

- Personal information and contact information, such as name, address, telephone number, email address, title, position and employer.
- Information in cover letter and CV.
- Where applicable, your picture.
- Other information that you provide the Company in connection with recruitment.

Shareholders

The Company collects and stores the following information about you in your role as a Shareholder.

- Personal information and contact information, such as personal identification number, name, address, telephone number, email address, and position.
- Holdings of shares or other financial instruments.
- Financial instruments, e.g. information regarding voting rights at general meetings of shareholders, shareholding and rights relating to the ownership.
- Information regarding proxies representing Shareholders, where applicable.
- Information regarding trustees, pledges and pledgees, where applicable, and other notes in the share register.
- Other information that has been provided by you or the organisation that you represent.

With respect to customers, suppliers and partners and company representatives for customers, suppliers and partners and potential customers, suppliers and partners and company representatives for potential customers, suppliers and partners, your personal data is usually collected from the company or organisation that you represent, but also, in certain cases, directly from you, e.g. by email, our social media or other channels of communication or in connection with events or meetings. The Company may also receive personal data about you from other partners of the Company. The Company may also use external information services to supplement existing data, e.g. with your position and contact information.

With respect to visitors of our website and job applicants, your personal data may be provided to the Company directly from you or from the staffing agency, recruitment company or hiring company through which you apply for work.

THE COMPANY’S PROCESSING OF YOUR PERSONAL DATA

The purposes for which we intend to process your personal data and the legal basis for the respective processing activities are stated in the tables below.

Customers, suppliers and partners (including company representatives)

Purpose	Legal basis
To be able to keep in touch with a representative of the customer, supplier or partner (e.g. in connection with the delivery of goods or services).	The processing is necessary for the Company’s legitimate interest to keep in touch with you in order to fulfil its obligations under the agreement with its customer, supplier or partner, i.e. the company that you represent (legitimate interest).



Purpose	Legal basis
To fulfil legal requirements, e.g. security requirements and accounting requirements.	The processing is necessary for compliance with the Company's legal obligations.
To enable marketing and communication about the Company's brand and the Company's products (e.g. mailing of newsletters and other marketing materials, invitations to the Company's events, meetings and other gatherings etc.).	The processing is necessary for the Company's legitimate interest to market its brand, its products and other similar products to you as a customer or to the company that you represent (legitimate interest).
To carry out surveys regarding the Company's products and customers buying experience.	The processing is necessary for the Company's legitimate interest to evaluate, develop and improve its brand, its products and its marketing (legitimate interest).
To ensure payment and analyse purchase history in order to offer customers the right products and marketing.	The processing is necessary for the performance of the agreement with the customer. The processing is necessary for the Company's legitimate interest to offer its customers relevant marketing with regard to the customers previous purchases (legitimate interest).
To receive payments from customers in connection with purchases of the Company's products and services.	The processing is necessary for the performance of the agreement with the customer.
To be able to respond to and compensate customers in connection with complaints and warranty matters.	The processing is necessary for the performance of the agreement with the customer.

Potential future customers, suppliers or partners

Purpose	Legal basis
To enable marketing and communication about the Company's brand and the Company's products and services (e.g. mailing of newsletters and other marketing materials, invitations to the Company's events, meetings and other gatherings etc.).	The processing is necessary for the Company's legitimate interest to market its brand, its products and other similar products to you or to the company that you represent (legitimate interest).

Visitors of the Company's website

Purpose	Legal basis
<p>To ensure the operation of the Company's website and application.</p> <p>To be able to develop the Company's website and to better adapt the website based on how it is used.</p>	<p>The processing is necessary for the Company's legitimate interest to improve, streamline, simplify and develop its website and to attract more customers/partners and to increase the number of recurring customers/partners (legitimate interest).</p>

Recruitment (job applicants at the Company)

Purpose	Legal basis
<p>To, in connection with recruitment, be able to decide who is best suited for a position with the Company and to ensure that the relevant person has the necessary skills.</p>	<p>The processing is necessary for the Company's legitimate interest to recruit the right employees and ensure that skilled people work for the Company (legitimate interest).</p>

Shareholders

Purpose	Legal basis
<p>To fulfil the Company's obligations to you as a Shareholder according to the Company's articles of association.</p>	<p>The processing is necessary to fulfil the Company's contractual obligations to you in accordance with the articles of association (performance of agreement).</p> <p>Regarding representatives of Shareholders, the processing is necessary for the Company's legitimate interest in fulfilling its contractual obligations towards its Shareholders (legitimate interest).</p>
<p>To fulfil the Company's obligations to you and other Shareholders in accordance with the Swedish Companies Act or other applicable legislation.</p>	<p>The processing is necessary to fulfil the Company's legal obligations under the Swedish Companies Act or other applicable legislation (legal obligations).</p> <p>Regarding representatives of Shareholders, the processing is necessary for the Company's legitimate interest in fulfilling its contractual obligations</p>

Purpose	Legal basis
	towards its Shareholders (legitimate interest).
Distribution of shareholder-related information	The processing is necessary in order for the Company to be able to inform Shareholders and other stakeholders in a timely and correct manner about information relevant to the Company (legitimate interest).

HOW LONG DOES THE COMPANY STORE YOUR PERSONAL DATA?

Your personal data is stored as long as there is a need to preserve them in order to fulfil the purposes for which the data was collected in accordance with this Privacy Policy. Thereafter, your personal data will be deleted.

Some personal data will, for the purpose of complying with applicable accounting legislation, be stored for seven years, counting from the end of the calendar year during which the financial year, to which the information pertained, was terminated.

Contact information regarding company representatives is stored during such time the Company considers that the information is necessary to maintain the relationship with the company or organisation. Deletion shall take place when the Company becomes aware that the information is no longer adequate or relevant for the purpose, or at the request of the contact person.

For more information about how long the Company stores specific personal data, please contact the Company. Contact information is provided under section "Contact Information" below.

WITH WHOM DOES THE COMPANY SHARE YOUR PERSONAL DATA?

The company does not disclose personal data to third parties, except when necessary to fulfil a legal obligation or to fulfil the Company's obligations to you, its customers and/or its partners. Your personal data will not be sold to third parties for marketing purposes. Situations when your personal data may be disclosed to third parties are listed in the table below.

Third party	Reason for third-party disclosure
Suppliers of cloud solutions	Personal data may be transferred to suppliers of cloud solutions since the Company stores certain information in cloud solutions.
Suppliers and partners	The Company may disclose your personal data to suppliers and/or

	partners, if the suppliers and/or partners need your personal data to fulfil their undertakings toward the Company.
Authorities	Personal data may be disclosed to authorities when necessary for compliance with the Company's legal obligations.
Sale	If the Company intends to transfer all or part of its business, personal data may be disclosed to a potential buyer.
The public	<p>The Company's share register is public and held available at the Company for anyone who wishes to take part of it. The information contained in the share register is therefore disclosed upon request.</p> <p>Minutes and voting list from the general meetings of shareholders may be disclosed to the Shareholders present at the meeting as well as to the Swedish Companies Registration Office, auditors and others to whom the Company has a legal obligation to disclose the minutes or otherwise considers it appropriate to disclose the minutes.</p>

TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES

The Company may transfer your personal data to countries outside the EU/EEA. If personal data is transferred to a country outside the EU/EEA, the Company will take measures to ensure that the personal data continues to be protected and will also take the necessary measures to ensure a legal transfer of the personal data to countries outside the EU/EEA.

SOCIAL MEDIA

Regarding personal data that occurs and is processed on social media, such as LinkedIn, Facebook, Instagram, Twitter and Youtube, we refer users to the policy provided by the respective service providers for information on how each service provider processes personal data. In the Company's view, the purpose of the processing is that representatives of existing and potential customers and partners

to the Company shall be able to interact and maintain contact with the Company via social media, in order to contribute to good relationships with customers and partners and to make the Company's customer service and product widely accessible through several different channels. The processing is necessary for the purposes of the Company's legitimate interest to market its brand and its products to existing and potential customers and to partners (legitimate interest).

YOUR RIGHTS

As the data controller, the Company is responsible for ensuring that your personal data is processed in accordance with applicable legislation.

The Company will, at your request or on its own initiative, rectify, erase or complete any information found to be inaccurate, incomplete or misleading.

You have the right to request access to and rectification or erasure of your personal data (e.g., if such erasure is required by applicable law), request restriction of the processing of your personal data and object to the processing, as permitted by applicable personal data legislation (e.g. if you contest the accuracy of the personal data or if the processing is unlawful but you oppose the erasure of the personal data and request restriction of its use instead). The Company will notify each recipient to whom the personal data has been disclosed in accordance with what is set out above (in the section "With whom does the company share your personal data?") regarding any rectifications or erasures of personal data as well as of restriction of processing of data according to this section ("Your Rights").

Under certain conditions, you have the right to data portability, i.e., a right to receive your personal data in a structured, commonly used and machine-readable format and the right to transmit those data to another controller.

If you do not want the Company to process your personal data for direct marketing purposes, you have the right to object to such processing at any time. When the Company has received your objection, the Company will cease the processing of your personal data for such marketing purposes.

You have the right, through a written and signed application, to obtain free of charge a register extract from the Company regarding which personal data are stored about you, the purposes of the processing and to which recipients the data has been or shall be transferred. You also have the right to obtain information about the envisaged period for which the personal data will be stored or the criteria used to determine this period. You also have the right to receive information about your other rights as specified in this section ("Your Rights").

We look forward to hearing from you if you have any complaints regarding the Company's processing of your personal data, in order to correct our processing if necessary. You also have the right to file complaints regarding the Company's processing of your personal data with the Swedish Data Protection Authority.

SECURITY OF YOUR PERSONAL DATA

You should always be able to feel safe when you provide us with your personal data. Therefore, the Company has implemented the security measures that are necessary to protect your personal data against unauthorised access, alteration and destruction. The Company will not disclose your personal data, other than as expressly provided in this Privacy Policy.

COOKIES

The Company uses cookie-like techniques to collect and use data. The information is stored in the form of a file comprising encrypted login data.

The Company uses cookies on the Company's website <https://navinci.se/> for the following purposes.

- To provide certain functions on the Company's website
- To improve the Company's website
- To provide a personalised user experience
- To improve the user experience
- To provide support services

The data collected by use of cookies is not shared with any third parties or used for any other purpose than the purposes stated above.

Cookies can be cleared, enabled and managed via a unit's browser settings.

IF YOU DO NOT SHARE YOUR PERSONAL DATA WITH THE COMPANY

If you do not share your personal data with the Company, the Company will not be able to fulfill its legal or contractual obligations towards you. For Shareholders, this means that you will not be able to exercise your rights as a Shareholder, including attending and voting at general meetings.

CHANGES

The Company reserves the right to change this Privacy Policy at any time. In the event of changes to this Privacy Policy, the Company will publish the amended Privacy Policy on <https://navinci.se/> with information on when the changes will come into effect and may also notify customers and partners in an appropriate manner.

CONTACT INFORMATION

Do not hesitate to contact the Company if you have any questions about this Privacy Policy, the processing of your personal data or if you wish to exercise your rights under this Privacy Policy or applicable legislation.

Navinci Diagnostics AB

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