

barium

Privacy policy

BARIUM & OUR PLATFORMS



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PURPOSE

Barium is proud to provide services that enables the safe and secure processing of personal data. In this policy we want to openly and clearly show how we collect and process personal and highlight our legal obligations. This policy primarily addresses:

- You as an existing customer of Barium
- You as a user of Barium Live
- You as a user of services utilized as Barium Live e.g. (Fastighetsägarna Dokument)
- You who are planning to become a customer to Barium
- You who are a partner to Barium
- You who communicate with Barium and our employees through various communication media such as e-mail, support cases, phone calls or social media

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DEFINITIONS

CONTROLLER

A natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

DATA SUBJECT

A natural person whose personal data is the subject of processing in any form.

DPO

Data Protection Officer

CUSTOMER/CLIENT

Customer of Barium. As a Customer you have an active subscription agreement with Barium. Customers have a designated contact person. (a *Contract Owner*).

CONTRACT OWNER

As a contract owner, you represent an organization that is a customer of Barium. As a contract owner you have the option to create and assign User Accounts to *Users* within your contract.

PERSONAL DATA

Any information relating to an identified or identifiable natural person (*Data Subject*); an identifiable natural person is one who can be identified, directly or indirectly, in

particular by reference to an identifier such as a name, and identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

PROCESSOR

A natural or legal person, public authority, agency or other body which processes personal data on behalf of the *controller*.

PROCESSING OF PERSONAL DATA

Any operation or set of operations which is performed on personal data or onsets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

USER

An individual assigned a User Account by his contract owner. Also a *Data Subject*.

1. PRINCIPLES FOR PROCESSING PERSONAL DATA

Barium follows the principles of legal processing of personal data as defined in Article 5 of the GDPR. These principles are:

- The data shall be processed in a legal, correct and transparent manner in relation to the registered (**legality, correctness and transparency**).
- They shall be collected for specific, explicit and legitimate purposes and at no point in time treated in a manner incompatible with these purposes.
- They should be adequate, relevant and not too extensive in relation to the purposes for which they are addressed (**task minimization**).
- They should be correct and updated. All reasonable steps must be taken to ensure that personal data which are incorrect in relation to the purposes for which they are processed are deleted or corrected without delay (**correctness**).
- They may not be stored in a form that allows identification of the data subject for a longer period than is necessary in relation to the purposes for which the personal data are processed (**Storage minimization**).
- They shall be treated in a manner that ensures appropriate security of personal data, (including protection against unauthorized or unauthorized treatment and against loss, destruction or accidental injury) using appropriate technical or organizational measures (**integrity and confidentiality**).
- The processor responsible for personal data shall be responsible for, and be able to demonstrate compliance with these points (**liability**).

2. PURPOSE OF THE PROCESSING BARIUM PERFORMS

As a customer of the services Barium Live, you allow Barium to process personal data in the following situations.

Billing situation	Mandatory
Statistics and analysis of system performance	Mandatory
Storage, including backup	Mandatory
Support tickets	Optional
Notifications by email from contracted services (Barium Live)	Some optional
Marketing dispatches (e-mail, and calls)	Optional

How Barium (as *Processor*) process personal data on behalf of our clients, is governed by separate Data Processor Agreements (DPA). In short, the DPA implies that Barium may only process this personal data in accordance with commonly agreed rules.

3. SECURITY

A wide range of security mechanisms (both organizational and technical) have been implemented to protect the privacy of personal data. These security mechanisms are included in Barium's Certified Information Security Management System (ISO-27001), which is reviewed annually by independent parties. Details about our security mechanisms can be read in our White Papers.

4. SITUATIONS WHERE BARIUM PROCESSES PERSONAL DATA

4.1 You are a customer to Barium

If you are a customer to Barium and our service Barium Live, the following applies:

Barium process personal information in our services on behalf of, and according to agreed instructions from our customers, (this situation is governed by separate PDA). In this regard, Barium is a *Processor* and the customer the *Controller*. Bariums services (like Barium Live) provides our customer with good opportunities to create purposeful applications where the customer have full control over:

- How personal data is collected
- How/when to delete the data
- Who is entitled to view and process the data inside the service.

4.2 You are planning to be a customer to Barium

If you plan to become a Barium customer or if Barium intends to start a customer relationship with you, your personal data may be collected and processed in Barium's CRM (Customer Relationship Management) system. In this situation Barium is the data *Controller*. For more information about this situation see our separate Privacy policy (Privacy Policy - From a marketing perspective).

4.3 Barium contacts you as a non-customer

Barium has a legitimate interest in conducting marketing against individuals in order to offer Barium's services to the organization the individual represents. For more information about this situation see our separate Privacy policy (Privacy Policy - From a marketing perspective).

4.4 As a non-customer, you contact Barium

There are situations where you (who are not a customer to Barium) communicate with Barium. For example, as an individual, you can send us an E-mail and ask questions about our products.

Reasonably everyone knows that e-mail communication is not a private technology. E-mail address and any personal data included in text is sent to and stored on the recipient's E-mail servers, anywhere in the world. This assumption also applies through other communications such as via social media.

Barium only process personal data discussed in this situation in accordance with the original intention of the sender. Barium neither shares or sells contact information to third parties.

4.5 You have a user account in one of our services, such as Barium Live

In order to use any of the services Barium provides, such as Barium Live. The system requires a user account in order to function as designed. This account is provided by your employer, (or by yourself in case you are the contract owner). See the paragraph: "User Accounts, Shared Responsibility" for more information.

4.6 Barium processes personal information on behalf of our customers

Barium processes personal data as *Processor* in situations where our customers are *Controllers*. This situation is governed by a PDA.

5. RESPONSIBILITY FOR PROCESSING PERSONAL DATA

The party who decides on the purposes of the personal data processing, is the party responsible (the Data Controller). As a customer you are always responsible for the processing of personal data you choose to carry out using Barium's services. This include the collection and registration of personal data. Do not forget to correctly informing your data subjects about the processing you intend to perform using Barium live. Avoid at all cost to send special categories of sensitive personal information using built in E-mail functionalities. All processing activities must be performed in accordance with applicable law.

6. WHAT PERSONAL DATA IS BARIUM PROCESSING

As mentioned above, Barium processes personal data in a variety of situations. Depending on what situations you come into contact with, your personal information may be in any of the following categories.

- Contact details such as name, e-mail address and phone number.
- Activity information about how users are using our website and our services. Such information may include IP number, device type, and browser, as well as information on how to interact with our services, such as what features you use, and what buttons you press, etc.
- Personal data that you, your employer (or other responsible party) chooses to register and process in services like Barium Live and Fastighetsägarna dokument.
- Other information we receive from you throughout your contact with us.

6.1 Barium is responsible for these personal data

6.1.1 Personal data associated with contract owners (the customer)

In addition to the personal data Barium as a *Processor* process on behalf of our customers, Barium also process personal data related to registered users of the type *Contract owner*. In this regard, Barium is the *Controller* and are responsible of the processing carried out with the purpose of deliver and charge for our services.

6.1.2 Personal data associated with a normal user account

Barium needs to process personal data associated to user accounts in order to ensure agreed service level regarding information security. (availability, correctness and confidentiality). Legal support for this is found in the agreed subscription agreement we have to honor and with Barium's legitimate interest.

Barium has its own purposes of processing this personal data and is thus the *Controller* in this regard. In order to comply with the information duty in GDPR, Barium is therefore responsible

for informing individuals (with user accounts in our services) about how Barium uses personal data associated to their user accounts.

The processing Barium carries out includes logging and analyzing user patterns, usage rate and load on our system. The purpose of this is to optimize and improve the services according to how they are used, (or not used), but also to detect and correct errors that may occur. The purpose is also to track and remedy abuse and criminal behavior.

The following information addresses Barium for its own purposes as described above:

- Attributes linked to user accounts
 - Account User Name
 - Name data
- IP numbers
- System Events e.g.
 - Timestamps of unsuccessful and successful logins
- Type of operating system on client used to access the service
- Type of browser through which the service is used

Barium is not responsible for keeping attributed linked to user accounts updated. The customer (or the user herself) are responsible of this.

If you (as a *customer*) don't want Barium to notify individuals (*data subjects*) about how personal data associated with their user accounts are processed by Barium as a *Controller*. Then you can choose to do this yourself. If you choose this the following rules apply.

1. Let Barium know that this is what you as a customer want, so we can stop sending notifications to your users.
2. You have to provide Barium with some guarantee that you will notify the data subjects instead of us. Keep in mind that the duty of disclosure to the data subject never disappears. If you choose this you are responsible for notifying data subjects about how their personal data is processed when he or she has a user account in any of the services provided by Barium.

See the paragraph: "User Accounts, a shared Responsibility" for more information.

6.1.3 Customer contacts stored in Barium Live

As a customer of the Barium Live service, Barium is responsible for processing personal information about you in order to deliver and charge for contracted service. The information processed is

- E-mail address
- First and last name

6.1.4 Personal data you send to Barium

Barium also process personal data (contact information) that is sent to Barium at the individual's initiative, for example via e-mail and so-called inbound marketing activities.

6.2 Your responsibilities as a customer of our services

You as a customer have great opportunities to create your own customized applications in our platform Barium Live. This also means that you yourself decide the purpose of processing and are responsible for the data you choose to collect and process in the service. Barium allows for the processing of certain types of categories of personal data. The arrangement is made in a separate Data Processing Agreement (PDA) between Barium and you as a customer.

6.2.1 All possible types of personal data you as a controller (and your users) register in the services

As a customer, you are the *Controller* for all personal data you choose to register and process in the services provided by Barium, regardless of category and sensitivity. Barium urges you, as a customer, to be extra careful when handling sensitive (special categories of) personal data. For example, do not export these outside the services using built in e-mail functionality. Always ask Barium support if you do not know how to configure this in a secure way.

6.3 User accounts, a shared responsibility

Barium and our customers have a shared responsibility for processing personal data (registered attributes) associated with user accounts (user profiles). Barium and our customers process these personal data for different and common purposes. Therefore, it is advisable to clarify the distribution of responsibilities.

Registered attributes associated with user accounts (user profiles) are listed below. Some of them are necessary for the service to work, others are optional and enable dynamic use of the service. As a customer (or account holder) you are responsible for registration the correct information to the attributes. You also decide which optional attributes are to be applied to a user account or not.

E-mail address	Mandatory, the service need this to operate
First- and Surname	Mandatory, the service need this to operate

Profile Picture	Optional
Telephone number	Optional
Title	Optional
Country	Optional
Language setting	Optional
Organisation	Optional

6.3.1 Barium's responsibility for personal data associated with user accounts

Please see paragraph 6.1.2 Personal data associated with a normal user account.

6.3.2 Customer's responsibility for personal data associated with user accounts

As a customer, you are the *Controller* for registered attributes associated to a user account. As a Customer you create, distribute and pay for these user accounts. As a customer you decide the purpose (the "why", you use our services) involved in the data processing of these attributes. For example, if you use the service for an onboarding process, it is important for you to know (and identify) who carries out tasks in the service so you can follow up the results.

It is therefore in your interest that the information is relevant, adequate and properly registered. As a Customer, you (and to some extent also the individual behind a user account) own the power to register, update and delete attributes associated with a user account.

6.4 For how long Barium saves personal data ACTIVE CUSTOMER

Information about you as a customer of Barium is saved as long as you are a customer of Barium, and thereafter no later than 12 months after the termination of the contract. Invoice information and invoice data are saved as long as necessary by law.

CUSTOMER DATA

Personal data that you as a customer and *Controller* let Barium process on your behalf in one of our services are saved as long as you are a customer or when you choose to delete it.

ATTRIBUTES ASSOCIATED WITH USER ACCOUNTS

Mandatory attributes associated with user accounts and user patterns, all for which Barium are the *Controller*, is stored for up to 3 years in our logs.

CONTACT INFORMATION OF NON CUSTOMERS

If you are a non-customer, but for various reasons have been in contact with Barium (for example, you have shown interest by downloading a White Paper or signing up for an event.) Barium then process your personal information (contact information) as long as we have an active dialogue. After 12 months of inactivity, ie. After Barium no longer believes that we have an active relationship, your personal data will be deleted from our CRM system.

7. LEGAL BASIS FOR PROCESSING

Barium has legal grounds for processing personal data in accordance with Article 6 of the GDPR.

7.1 Performance of a contract

In cases where Barium has a customer relationship with you as a customer through a binding service agreement (contract), Barium considers that we have legal basis to process the personal information necessary to comply with this contract. (GDPR - Article 6.1, b).

In order for Barium to maintain agreed service level (SLAs) regarding Operation, support and basic system functionality, Barium must process personal data e.g. attributes associated to provided user accounts. (GDPR - Article 6.1, b).

7.2 Legitimate interest

Barium have a legitimate interest in processing personal data (contact information) to individuals who are considered to be of particular interest to Barium. The purpose of the processing is to create an active customer relationship with the individual (and the company they represent). Barium considers that our need to perform marketing activities towards these individuals is stronger than the violation the processing entails. Especially since the individual's contact information is collected from publicly published areas, e.g. a company's website. The personal data may also be collected from the individual himself through so-called inbound marketing activities, or from the individual directly.

Legitimate interest is also called upon when Barium process personal data associated user accounts and their activities, with the purpose to defend the integrity of the services.

8. SUB PROCESSORS

Barium uses various sub processors to help Barium deliver service to our *Customers*. No personal data (or other sensitive customer data) is donated or sold to any third party.

Some of these sub processors, transfer and process personal data outside the EU/EES area. Barium uses only subcontractors that can demonstrate compliance with Privacy Shield or standard data protection clauses adopted by the European Commission.

On our website you will find information about the Sub Processors we use. <https://www.barium.se/en/terms>

8.1 Privacy Shield

Privacy Shield is an agreement between the EU and the US, which was met in 2016. The agreement implies the transfer of personal data to recipients in the United States that are affiliated with the Privacy Shield framework. Recipients covered by Privacy Shield are considered to meet an adequate level of protection for data processing. (see GDPR Article 45). It is possible to check subcontractors' compliance with Privacy Shield via this link: <https://www.privacyshield.gov/list>.

9. WHERE IS PERSONAL DATA STORED

Personal data that you as a *Customer* collect and process in our services are stored in security-classed server buildings in Sweden.

Personal data you as a *Customer* send to Barium in support tickets, are stored and processed in United States. Sub processors involved in this processing comply with Privacy Shield.

Personal data used by Barium to communicate and perform marketing activities towards you as a customer or non-customer via E-mail will temporarily be stored (queued) in the US, before it is forwarded to you as a recipient anywhere in the world. Sub processors involved in this processing comply with Privacy Shield.

Personal data (contact information) that Barium process about you as a *Customer* are stored in CRM systems operating from the US. Sub processors involved in this processing comply with Privacy Shield.

10. YOUR RIGHTS AS A REGISTERED INDIVIDUAL

As a *Controller* Barium is obligated to only process personal data that is accurate, relevant and necessary in relation to our legitimate purposes. You as a *Data subject* are always entitled to check that this is done correctly according to applicable data protection legislation.

We want it to be easy for you to exercise your entitled rights by self-service. One way to achieve this by unsubscribe from marketing E-mails we sent out. Also, as a *Customer* of our services you can yourself delete and export information about yourself or other *Data Subjects* whose personal data you are the *Controller* of.

Barium does not use consent as a legal basis for any form of treatment. This means that individuals are unable to revoke consent. However, individuals have the right to object to and ask for restrictions of the processing performed.

10.1 How you claim your rights

Your rights can be claimed by applying for them via privacy@barium.se or through our future web service (coming soon).

- Your application is managed through a controlled process that always begins with the right of access.
- You are guided and informed by us throughout the process.
- The goal is that the process should take a maximum of 30 days.
- The result of the application will be a report we will send to you.

Based on the information in that report, you can proceed to the process and apply for your other rights. Through the process and the report you receive from us, you will be informed about the following:

- If Barium processes your personal data,
- What personal data we process in this case.
- What legal basis we have for processing your personal data.

10.2 Right of access

As a customer (*Controller*) and **as a User** you always have access to the registered personal data in stored in the service. If you still want to know what categories of personal data Barium (as a *Controller*) process, you can apply for this.

As a non-customer of Barium, your personal data can be processed for marketing purposes. If you want to know if your personal data is processed by Barium, you can apply for this.

10.3 Right to object

As a customer (*Controller*) or a **User** you cannot object to the mandatory processing involved to deliver the services to you.

As a non-customer, you can object to processing by unsubscribing from further e-mail communication. You do this via a link in one of the promotional emails you receive from us. If you are not satisfied with this, you can apply for further objections.

10.4 Right to data portability

As a customer (*Contract Owner*) and a **non-customer** you can apply for a digital copy of all personal data (contact information) Barium have stored is about you.

As a User you cannot ask Barium to export a digital copy of your personal data. This is because Bariums processing of this data is based on legitimate interest and not consent.

10.5 Right to correction

As a customer and a **User** you can yourself update and correct your own personal data stored in my account page in our services. If you have problems you can always turn to Bariums support.

This apply to everyone: If Barium at some point provides you with an asset report showing personal data we store about you, and this data is incorrect. (and you cannot correct this yourself). Then you can always ask us to update the data.

10.6 Right to be forgotten/deleted

As a data subject you have the right to have your personal data forgotten / erased, as long the data no longer are necessary for the purposes for which they were collected or otherwise processed.

Barium will and not delete data we, in agreement with other legal requirements (for example bookkeeping laws) must store.

As a customer of any of Barium's services (for example, Barium Live), you always have the option to terminate your contract (stop being a customer). With this, your personal information (which is stored on the service) will be completely deleted after 30 additional days. **As an active customer**, you cannot ask to have your contact information deleted from our internal CRM system.

As a newly terminated customer you have the right to be forgotten / deleted. However, Barium will routinely save your contact information for at least 12 months. After 12 months of inactivity, contact information will be deleted from internal CRM systems. If we during this time have an active communication where we together are working on a solution to bring you back as a *Customer*, then your contact information will be saved as long as we have a legal basis for this.

As a non-customer you are entitled to be forgotten. Just apply for this as described earlier.

As a user you can delete your own account in the service you use. In some cases might have to ask your *Contract owner*. By deleting your user account all your personal data (attributes associated with your account) will be deleted.

10.7 Right to restriction of processing

As a customer, and a **User** the processing of some of your personal data will always be mandatory in order for us to deliver the service to you. The processing of this data cannot be restricted.

As a non-customer, you are entitled to restrict the processing. You can apply for the type of restriction you want to make after we have provided you with an asset report. See Right to access above.

10.8 Right to information

As a data subject, you always have the right to receive correct information at the correct place and time. Barium always tries to keep you informed without being annoying. This policy document is a part of fulfilling your right by providing you with all necessary information about how Barium process your personal information.

11. REVIEW OF THIS POLICY

This policy is owned and reviewed by Barium's DPO (Data Protection Officer). The policy is also reviewed (at least 1 year / year) by an external auditor during our annual ISO-27001 certification audit.

12. QUESTIONS AND CONTACT INFORMATION

If you have any comments, questions or other concerns about our privacy policy or personal data management, you are always welcome to contact us at: privacy@barium.se