

# Privacy Policy

PreVet International AB has this day, 2024-11-28, established the following privacy policy.

## 1. Purpose

- 1.1. This privacy policy (the "**Policy**") applies when PreVet International AB org. No. 559107-7655 Sidenvärgatan 17, 753 19 Uppsala, ("**PreVet**") provides services via web or app (the "**Service**"). This policy applies to you who use the Service, have a user account with us, or visit our website. We encourage you to read the information in this Policy carefully. In case you have questions about our processing of personal data, you can always contact us in accordance with section 10.1. The purpose of this Policy is to give you as a customer full insight into how PreVet handles your personal data. Our aim is for you to feel confident that your data is processed in accordance with applicable laws such as the General Data Protection Regulation and other relevant legislations. In this Policy, we also describe what rights you have regarding the processing of personal data in relation to us and how you can exercise these rights. By using the Service, you confirm that you have read and understood the content of this Policy.
- 1.2. By creating a user account and/or use the Service, you confirm and accept that PreVet retrieves and provides information that exists on your mobile phone, tablet or other device and that PreVet process your personal data in accordance with this Policy. By using the Service, you also accept that the following information is processed and shared with PreVet's partners in accordance with section 3.2.; data described under section 2.1; information regarding your animal healthcare routines which you have provided to PreVet: and the information that you have an agreement with PreVet.

## 2. Collection and processing of personal data

- 2.1. When you create your account and/or use the Service, PreVet will collect and process your personal data. By collecting and processing personal data, PreVet becomes the data controller according to GDPR. The personal data collected about you is your contact details (including name, address, username, social security number, email and telephone number), details of IP address and information about your logins to the Service, Firebase Cloud Messaging token and details of your animal(s) such as name, age, breed, colour and chip and registration number. When purchasing the app and/or subscribing to the app from the App Store or Google Play, information about your purchase transactions (amount, time, type of transaction and product) will be collected by third parties (App Store and Google Play). PreVet is not responsible for such third parties' processing of your personal data. PreVet also collects information via its own cookies or third-party cookies and other similar analytical tools, please see section 8.1.

- 2.2. PreVet primarily gets access to personal data and other data when you register your information directly in the Service or via information in emails from you. We may also access your personal data through third parties, such as veterinarians and farriers. PreVet may also send data from the Service about you and your animal(s) to these third parties. This kind of data will only be transferred to or from PreVet at your direct request.
- 2.3. PreVet may also process images, videos and other personal information that you have shared on social media. If you tag/mention us in a post, attend our events or use our hashtags, we may choose to publish and use your material in PreVet's social media platforms and channels. By tagging or mentioning us (or similar), you give PreVet your consent to process your personal data as well as a non-exclusive, royalty-free, right to use these images in our marketing, including social media, website, email and other customer communications. By tagging or mentioning us (or similar), you consent to our use of your photos and confirm that you own all rights to the photos, that you have permission from the people that appear in the photo and confirm that our use does not violate any laws or the rights of any third party. You release PreVet from all obligations to pay for the use of your photos and shall indemnify PreVet from any claims related to the use of the photos. For questions or withdrawal of consent, please contact us using the contact details in section 10.1.

### **3. Why we process personal data**

- 3.1. PreVet processes your personal data for several purposes. PreVet mainly processes personal data for the purpose of entering into agreements and for providing, administering, developing and adapting the Service and its functionalities, we also process personal data to ensure customer knowledge, to administer the customer relationship with you and adhere to regulatory requirements regarding security and the like. We also use the collected information for market and customer analyses, market research, statistics, business follow-up and business development within the framework of the Service.
- 3.2. Further, PreVet processes your personal data to provide better and more personalized offers and service. Personal data may, for example, be processed, correlated, segmented and analysed so that we can provide information, offers or recommendations about our or our partner's goods and services through targeted marketing, which is adapted to your preferences, behaviours, needs or lifestyle. PreVet may also process your personal data in such a way that other users can access your name and email address in connection with various services and functions offered within the Service.
- 3.3. If you do not want PreVet to process your personal data for direct marketing or product launches, you have the right to opt-out from direct marketing from PreVet. Whereby PreVet will stop such marketing. To exercise this right, you must notify us using the contact details in section 10.1 below.

#### 4. Lawful grounds for personal data processing

4.1. Each personal data processing is based on a lawful ground according to Article 6(1) GDPR, as documented below. Within the framework of the Service, we process your personal data for the following purposes:

Process of personal data	Categories of personal data	Purpose	Lawful ground	Retention period
Entering agreements with customers via e.g. forms on the web, such as demo or price inquiry, via e-mail and telephone.	Contact information including name, e-mail, social security number, telephone number, address and any technical information about how you have interacted with us.	The processing of personal data is necessary for us to administer contact with prospective and potential customers, as well as to enter agreements with customers.	<p>The processing of personal data is carried out based on the following lawful grounds:</p> <p>Performance of an agreement (Art 6.1b), since the processing is necessary to take steps prior to and during the conclusion of an agreement with a customer, with potential customers, the legal basis is of legitimate interest (Art 6.1f).</p> <p>The retention of the agreement is motivated because of our legal obligation to do so (Art. 6(1c)).</p>	<p>The agreements and the personal data is stored for the duration of the contractual relationship with the customer and for a retention period of 7 years afterwards in accordance with the Chapter 7 of the Accounting Act.</p> <p>If PreVet does not enter an agreement with the customer, the personal data will be deleted after 5 years from the date the personal data was received or in the event PreVet has submitted a quotation, 5 years after the quotation has expired. Due to the possibility of, among other things, improved customer experience and to be able to enter into agreements with customers in the future and thereby meet the customer's wishes and needs. The data is then anonymised to be used for statistical purposes or deleted. This retention is motivated by PreVet's need to, inter alia, improve</p>

				<p>customer experience and ability to enter future agreements fitted to the customers needs and wishes.</p> <p>After the retention period the personal data is anonymised to be used for statistical purposes, or otherwise deleted.</p>
The provision of the Service	Name, e-mail, social security number, telephone number and address, address book and data including the data subject's activity in the Service and times for registered instances of logins.	The processing of personal data is necessary for PreVet to meet the agreed functional standards in relation to the customer and to evaluate and develop the functionalities of the service.	The processing of personal data is carried based on the following lawful ground: Performance of contracts with our customers (Art 6.1b).	The personal data is retained for as long as the customer has a user account in the Service, after the termination of the user account the data is retained for at least 30 days (PreVet Basic and PreVet Pro). For the products PreVet Stall and PreVet Hov the data is retained for 5 years due to the Swedish Board of Agriculture's requirements for retention of medical records. User data entered in the Service by the customer can be deleted at any time. If the customer chooses to delete the account, the data will be permanently deleted after 30 days. For farriers who use PreVet Hov, the data is stored for 5 years with reference to the Swedish Board of Agriculture's regulations and general guidelines (SJVFS 2023:19)

				on animal health personnel).
Customer service via email, phone or CRM system	Name, email address, any information about the case.	We store information and personal data to provide customer service, including answering any questions from customers and assist with technical problems, as well as to ensure the functionality of the Service.	The processing of personal data is carried out based on the following lawful grounds: Performance of contracts (Art 6.1b) (for existing customers). For potential customers, the legal basis is legitimate interest (Art 6.1f).	The data is stored for us to provide customized customer service. The data is therefore retained for as long as the customer has an user account with Pre-Vet, and if necessary for a longer period (maximum of 5 years) in order for PreVet to provide traceability and feedback on technical problems. For farriers who use PreVet Hov, the data is stored for 5 years with reference to the Swedish Board of Agriculture's regulations and general guidelines (SJVFS 2023:19) on animal health personnel). After that, the data is deleted or anonymized to be used for statistical purposes.
Invoicing	Name, e-mail address, telephone number, address, social security number, company name.	To enable and administer invoicing to customers.	The processing of personal data is carried out based on the following lawful grounds:  Performance of contract (Art 6.1b) and legal obligations (Art 6.1c).	The data is retained for 7 years in accordance with Chapter 7 of the Swedish Accounting Act.
Marketing via web, app and email via CRM system	Email, name, telephone number, type of subscription and place of residence.	We store information in order to communicate updates, features, news, marketing	The processing of personal data is carried out based on the following lawful grounds:	The data is retained for as long as the customer has a user account in the Service. When

	<p>Personal data including pictures and videos that you have tagged/mentioned us in can be used for marketing.</p>	<p>and offers about the Service.</p>	<p>Legitimate interest when PreVet wants to send marketing to you (Art. 6.1 f), or, consent (Art. 6.1a) if you have consented to your personal data being processed for direct marketing purposes,</p>	<p>the customer's account is deleted, any mailings and history in the app is deleted.</p> <p>The data is anonymised and will only be available as statistics for statistical purposes.</p> <p>If you are not a PreVet customer but have signed up for our email marketing (e.g. via a trade fair, web form or our website), we will save your email address, name and other information you have provided in connection with the registration. You may receive newsletters and offers. You can withdraw your consent and unsubscribe at any time by clicking on the unsubscribe link in each mailing from us.</p> <p>If PreVet does not enter an agreement with the customer, the personal data will be deleted after 5 years from the date the personal data was received. The retention period is motivated by PreVets need to ,</p>
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				<p>among other things, ensure improved customer experience and to be able to enter into agreements with customers in the future and thereby meeting the customer's wishes and needs</p> <p>If an agreement is not entered, the personal data will be deleted after 5 years from the date the data was received. Due to the opportunity for improved customer experience and to be able to enter into agreements with customers in the future and thereby meet the customer's wishes and needs.</p>
Usage of our website and confirmation or resetting of email address and password	Email Address, Metadata of a message, including information about the sender, the recipient, the subject line, the original IP address, and other routing data.	We store the information to provide functions that enables the user to confirm email addresses and request new passwords. This data is useful for troubleshooting regarding processes and delivery issues that periodically occur when users send messages.	The processing of personal data is carried out based on the following lawful ground: Legitimate interest (Art 6(1)(f)).	The metadata of a message is retained for 30 days and the message for up to 7 days for both incoming and outgoing messages.

4.2. In order to save our customers' personal data, we sometimes ask for the customers' consent. Consent is obtained by us actively asking for permission to save the customer's personal data for a specific purpose, for example marketing. A customer may only give his/hers consent if he/she is at least 18 years old, or else the customer must ask their parents to consent. A consent must be given voluntary and can be withdrawn by the customer at any time. If the consent is withdrawn, we will delete the

customer's personal data. To withdraw your consent, please contact us in accordance with section 10.1 below.

### **Erasure of personal data**

- 4.3. Your personal data will only be retained for as long as it is necessary, and the retention is needed to fulfil the purposes for which the data was collected. You can delete your user account by contacting PreVet using the contact details below in section 10.1. When you choose to delete your user account, PreVet will delete and/or de-identify or anonymize information that can be attributed to you. PreVet will then delete your entire user account together with all data in that account, including personal data. However, any data that PreVet is required to save by law will be saved and kept for further processing. PreVet may also store data for longer if it is necessary to safeguard PreVet's legal interests, e.g. because of an ongoing legal process.

## **5. Disclosure and transfer of data**

- 5.1. PreVet may disclose or otherwise provide information about you and your animal care to PreVet's partners for research purposes. However, you can feel confident that PreVet's partners will not be able to identify you or your animal(s), as the information disclosed is de-identified and anonymized, meaning that the data does not contain any names, social security numbers, registration numbers, contact information or other personal information. Our partners have agreed not to combine the information with other registers for the purpose of revealing your or your animal's identity. The partner is not allowed to disclose the information to anyone else without PreVet's written approval.
- 5.2. Personal data may be disclosed if such disclosure is necessary for PreVet to comply with applicable legal requirements or orders from authorities to safeguard PreVet's legal interests or to detect, prevent or draw attention to fraud and other security or technical problems. The Service may contain offers from external partners, e.g. via a link to the partner's website. If you choose to take advantage of such an offer, personal data may be transferred between PreVet and the external partner in question. Personal data may also be disclosed to partners on insurance matters. In these cases, the external partner is the sole data controller for its own processing of your personal data. You will always be expressly informed if a specific offer within the Service is provided by another party than PreVet. PreVet may also disclose personal data to companies that process personal data on PreVet's behalf, e.g. our IT suppliers, or to suppliers in PreVet's advertising network. These companies will act as our data processors, please see section 8.4 for more information.
- 5.3. Your personal data may be transferred to or stored in a country outside the EU/EEA to ensure functionality with e.g. Apple and Google update and subscribe feature. By creating a PreVet account, you agree that your personal data may be processed, transferred and stored outside the EU/EEA. When PreVet transfers personal data outside the EU/EEA, this is only done if we have a lawful ground for the transfer in accordance with applicable data protection laws and regulations, e.g. that the third country has an adequate level of protection for personal data or that PreVet, or our



subcontractor, has ensured an adequate level of protection on the basis of standard contractual clauses (SCCs) adopted by the European Commission. The standard contractual clauses can be a basis for a transfer if both parties have agreed to comply with the standard data protection clauses in their agreement.

## 6. Data Security

- 6.1. PreVet want you to feel secure when you provide us with your personal information. PreVet has therefore taken all security measures necessary to protect your personal data from unauthorised access, alteration and deletion.
- 6.2. In order to provide technical and organizational protection measures according to the GDPR, PreVet takes several security measures to ensure the protection of users' data and privacy. All communication between PreVet's SaaS platform and the users' device is done through HTTPS, which guarantees encryption of all sensitive information and protection against unauthorized eavesdropping. We utilize a model for authentication and permission to control access to our users' systems and data. This includes usernames, passwords, and role-based access control, with the aim of ensuring security and restricting access based on the user's role. To further secure stored information, PreVet uses encryption for user data in its systems and databases. PreVet also conducts regular security audits of its systems, databases, and mobile apps to identify and address any security risks.
- 6.3. If you suspect or discover technical errors, personal data breaches or deficiencies, we ask you to contact PreVet using the contact information below.

## 7. Policy for Cookies

- 7.1. PreVet's Services on PreVet's websites and in the app use cookies and other technologies (hereinafter "Cookies") to function properly. Cookies are used so that PreVet can keep visitor statistics and for PreVet to improve the user experience for you. PreVet also collects, analyses and collates user information for the purposes set out in section 3. By accepting our Cookies, you also consent to the processing of your personal data collected in connection with the use of Cookies. If you do not accept the use of Cookies, you can configure your browser to not accept Cookies. If you choose to configure your browser not to accept Cookies, PreVet can unfortunately not guarantee that the Service will function properly.
- 7.2. PreVet uses different types of cookies to improve your experience on the website. Below we have listed exactly which cookies we use, their purpose and how long they are retained:

**Cookies generated directly by PreVet via <https://PreVet.se/> that PreVet consider necessary**

Provider	Cookie	Purpose	Period of retention

Hubspot.com	_cf_bm	This cookie is used to distinguish between humans and robots. This is beneficial for the website in order to make valid reports regarding how the website is used.	1 day
Hubspot.com	_cfuvid	This cookie is part of the services provided by Cloudflare – including load balancing, delivering website content, and serving DNS connectivity for website operators.	Per session
PreVet.se	CookieConsent	Stores the user's consent regarding cookies for the domain in question.	1 year
PreVet.se	Elementor	Used in conjunction with your website's WordPress theme. The cookie enables the website owner to implement or modify the website's content in real-time.	Constant
Nr-data.net	JSESSIONID	Preserves the user's permission regarding page requests	Per session
gstatic.com	rc::a	This cookie is used to distinguish between humans and robots. This is beneficial for the website to make valid reports on the use of the website.	Constant

gstatic.com	rc::a	This cookie is used to distinguish between humans and robots.	Per session

**Cookies that are not necessary for the website to function. For example cookies relating to statistics and marketing**

<b>Provider</b>	<b>Cookie</b>	<b>Purpose</b>	<b>Period of retention</b>
PreVet.se	messagesPrUtk	Stores a unique ID-string for each session in the chat box. This allows the site's support to view previous cases and reconnect with the previous support.	180 days
PreVet.se	__hssc	Identifies if cookie data needs to be updated in the visitor's browser.	1 day
PreVet.se	__hssc	Used to recognize the visitor's browser on repeated visits to the website	Per session
PreVet.se	__hstc	Specifies a unique ID for the session. This allows the website to collect data on visitor behaviour for statistical purposes.	180 days
PreVet.se	hubspotuk	Specifies a unique ID for the session. This allows the website to collect data on visitor behaviour for statistical purposes.	180 days

googletagmanager.com	td	Records statistical data on user behaviour on The website. Used for internal analysis by the website operator.	Per session
Hubspot.com	__qtq.gif	Sends data to the Hubspot marketing platform regarding the visitor's device and behavior. Tracks the visitor across different devices and marketing channels.	Per session
PreVet.se	_ga	Used to send data to Google Analytics about the visitor's device and behavior. Tracks the visitor across devices and marketing channels Marketing Channels	2 years
PreVet.se	_ga_#	Used to send data to Google Analytics about the visitor's device and behavior. Tracks the visitor across devices and marketing channels.	2 years
PreVet.se	_gat	Used to send data to Google Analytics about the visitor's device and behavior. Tracks the visitor across devices and	1 day

		marketing channels.	
PreVet.se	_gid	Used to send data to Google Analytics about the visitor's device and behavior. Tracks the visitor across devices and marketing channels	1 day
google.com	ads/ga-audiences	Used by Google AdWords to re-engage visitors who are likely to convert into customers based on the visitor's online behavior across different websites.	Per session
hubspot.com	hs.superstore.laboratory.143208661#default	Under investigation	constant
static.hsappstatic.net	HUBLYTICS_EVENTS_53	Collects data about visitor behavior from multiple websites in order to present more relevant advertising – This also allows the website to limit the number of times the visitor is shown the same ad.	Constant
hubspot.com	viral-links/v1/tracking	Tracks the individual sessions on the website, allowing the website to compile statistical data from multiple visits. This data can also be used to generate leads for marketing purposes.	Per session

googletagmanager.com	Td	Records statistical data on the behavior of users on the website. Used for internal analysis by the website operator.	Per session
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7.3. You can choose yourself which cookies to accept in your browser and you may withdraw your consent to cookies at any time. Please visit your browser's support page for instructions on how to delete cookies that are stored on your device.

7.4. When you download PreVet's app on your mobile phone, tablet or other device, it is necessary for PreVet to store and retrieve certain technical information from the device for PreVet to be able to provide and update the Service. By downloading the app, you agree that PreVet stores and retrieves certain technical information from the device. If you no longer wish PreVet to store and retrieve the technical information, you need to uninstall the app.

## 8. The data subject's rights

8.1. PreVet is the data controller and is responsible for ensuring that your personal data is processed in accordance with applicable laws on data protection. As a data subject registered with us, you enjoy a number of rights under applicable laws on data protection that you can exercise at any time. To exercise your rights, please contact us using the contact details in section 10.1 below.

8.2. Right to information. As a data subject, you have the right to receive information when your personal data is processed. We undertake to provide you with clear and easily accessible information about how your personal data is processed, both at the time of collection and any time at the request of you as a user. The information is *inter alia* provided through this policy, which you can access both via our website and via a link in the app, more detailed information will also be given upon your request at any time. Furthermore, we undertake to provide special information in the event of data breaches or similar personal data breaches involving your personal information. All information will be provided free of charge and in written form, which may include electronic messages or the like.

8.3. Right to access. You have the right to contact us to find out whether your personal data is being processed. If your personal data is processed, PreVet is obliged to provide a copy of the data via a register extract and provide information on the following:

- The categories of personal data that are being processed
- Purpose of the use of personal data
- Retention period of the data
- Who the personal data has been shared with

- Where the data was collected

If you want to exercise this right and obtain an extract of your personal data being processed, you need to specify (through an application which have been signed by you) whether there is a special information you want to receive, or if you want us to send you a full register extract containing all the data we process about you. You have the right to access any such information free of charge. Please note, however, that there may be situations where we cannot disclose the information, for example due to provisions in applicable law. In some situations, PreVet may also choose not to provide a copy of the data, for example if the data subject makes unfounded or unreasonable requests, such as requesting access several times within a short period of time.

- 8.4. PreVet may engage a number of data processors in order to deliver the Service. Upon request, you can find out which data processors we engage by contacting using the contact details in section 10.1 below. PreVet ensures that all data processors comply with applicable data security laws as well as our Policy and internal procedures. PreVet always sign a data processing agreements with all contracted data processors.
- 8.5. Right to rectification. PreVet is obliged to ensure that and any incorrect data about you is rectified upon request from you. As a registered person with us, you can have your personal data rectified by changing your information in the Service yourself or by contacting us using the contact details in section 10.1.
- 8.6. Right to erasure. Under certain circumstances, you can request that PreVet erases your personal data. Please note, however, that there may be exceptions to this right, for example when PreVet is obliged according to applicable laws to process personal data. If you wish to have your data deleted, you must contact us with such a request and specify which data you wish to have deleted. See further in section 4.3 of this Policy.
- 8.7. Right to restriction of processing. Under certain circumstances you as a data subject have the right to request that our processing of your personal data is restricted. Restricted processing means that the data is marked, showing that the data can only be used for specific, limited purposes in the future.
- 8.8. Right to object. You can object to your personal data being processed by us, if the lawful ground for such processing is "legitimate interest" according to GDPR. For example, when we process your data for the purposes of direct marketing. If you object to us processing your personal data for direct marketing, the data may no longer be processed for such purposes. We will then erase your personal data, and you will no longer receive direct marketing.
- 8.9. You can exercise your right to data portability by contacting us using the contact details in section 10.1. Your need to specify what personal data you wish to have transferred. Please note that the tight to data portability only extends to such personal data that you have provided us, and that the lawful ground for us processing that data

is either a) that the personal data is processed with your consent, or b) in order for us to fulfil an agreement with you.

- 8.10. Do not hesitate to contact PreVet if you have any questions about our processing of your personal data or wish to exercise any of your rights under the General Data Protection Regulation. Our contact information can be found below in section 10.1 .
- 8.11. The Swedish Authority for Privacy Protection (IMY) is the supervisory authority for the processing of personal data and data protection in Sweden. You have the right to lodge a complaint about the processing of personal data with IMY. Contact information to IMY and how to submit a complaint can be found at:  
<https://www.imy.se/privatperson/utfora-arenden/lamna-ett-klagomal/>

Swedish Authority for Privacy Protection  
Box 8114  
104 20 Stockholm  
[www.imy.se](http://www.imy.se)

## **9. Changes and updates to the Policy**

- 9.1. This Policy supersedes all previous versions. PreVet reserves the right to continuously revise the Policy and make changes and updates. PreVet recommends that you regularly visit our website to stay informed of any updates. By using the Service, you accept any changes and updates to the Policy. In the event of major changes to the Policy, you will be expressly informed of these changes and what they mean for you and your personal data. Version 2024, Policy last changed 2024-11-28.

## **10. Contact details to the data controller**

- 10.1. We care about you and your privacy. Our aim with providing this policy is for you, as a customer and data subject, to understand and feel secure with how your personal data is processed. Therefore, we would like to know if you are dissatisfied with us. We aim to respond to all comments as soon as possible. If you would like to get in touch with PreVet to exercise your rights, obtain more information about our personal data processing or submit comments and/or complaints, please contact:

PreVet International AB  
Kontaktperson: Jenny Gagnér  
Sidenvärgatan 17  
753 19 Uppsala  
Telefon: +46 73 – 51 22 857  
E-post: support@PreVet.se