

# PRENAX Privacy Policy

## 1 Scope

- 1.1 Prenax (the Data Processor) will only process personal data on behalf of its clients (the Data Controller) for the purpose of Subscription Services. Prenax agrees not to process any personal data for any other purpose and agrees to fully comply with the General Data Protection Regulation (GDPR).
- 1.2 Prenax will only process the following types of personal data:  
Personal data that is required to fulfil the ordering and delivery of Subscription Services. This typically includes name, delivery address, email address and/or IP address.

## 2 Security

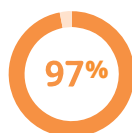
- 2.1 Prenax shall implement appropriate technical and organisational security measures to protect all personal data. This protection is against, and not limited to, accidental or unlawful destruction, loss or alteration and against unauthorised disclosure, abuse or other processing in violation of the provisions laid down in the Directive 95/46 EC of the European Parliament and of the Council and any applicable laws implementing it and/or any amendments hereof, including the Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing the EU Directive (hereinafter altogether referred to as the "Data Protection Legislation").
- 2.2 Prenax will ensure that in the processing of personal data it will, at all times, comply with minimum security requirements required by the General Data Protection Regulation (GDPR).
- 2.3 Prenax permits clients (subject to reasonable and appropriate confidentiality undertakings) to audit Prenax data processing activities and compliance to verify, and/or procure, that Prenax are in full compliance with their obligations under the General Data Protection Regulation (GDPR).
- 2.4 Prenax will ensure that the employees processing personal data on its behalf have committed themselves to the obligation of confidentiality regarding any personal data processed.
- 2.5 Prenax shall immediately inform the client if, in its opinion, an instruction infringes the Data Protection Legislation.
- 2.6 All Prenax systems are built with software security as a vital part of the design. This implies that all systems are designed and built upon the assumption that malicious practices may occur, and that all systems and processes need to be prepared for these events.

## 3 Sub-contractors

- 3.1 Prenax do not use sub-contractors, but in the future event that this should occur, Prenax would expect and require the same policies as laid out in this document from subcontractors.

## 4 Transfer of Data

- 4.1 Prenax guarantees that it will not transfer any personal data other than as set out in this policy.
- 4.2 Prenax will not transfer personal data out of the EU/EEA without the prior written approval of the Data Controller. When the Data Controller orders in writing any published material sourced outside the EU/EEA, he expressly agrees that the personal data necessary to process the order is transferred, outside the EU/EEA to the publisher's country of origin. In such event, the Data Processor must comply with any requirements established by any data protection authority or any other governmental authorities necessary for the granting of approval by such authorities for the transfer of personal data outside of the EU/EEA, including by adherence to the Commission's standard contractual clauses as set out by Commission Decision of 5 February 2010 with later amendments, to the extent applicable.



Client retention rate



Years our staff stay with us



Average saving in first 18 months



Tonnes of paper to digital in last 5 years

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## 5 Data Breach Notification

- 5.1 Prenax shall without undue delay notify the Data Controller in case of any identified or potential breach of personal data. The notification shall include any other information required in order for the Data Controller to comply with the Data Protection Legislation, including information about the nature of the breach and measurements taken to control it.

## 6 Data Storage

Prenax will not store any personal data, other than that which is necessary for delivering the service to the client and that which is necessary to comply with legal requirements. Personal data is securely stored in the EU/EEA.

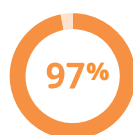
## 7 Miscellaneous

For any questions regarding Prenax's Privacy Policy, please contact us at [privacy \(@\) prenax.se](mailto:privacy@prenax.se) or write to:

Prenax  
Privacy Policy  
Box 1080  
Torshamnsgatan 39  
164 25 Kista  
Sweden

Policy revised and approved 2018-02-15

Prenax Global AB management team / Fredrik Petersson (CTO)



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