

PRIVACY POLICY FOR PANELLISTS

1 Introduction

When you participate in our surveys as a panellist, Wahsel AB, org. nr. 559387-5403 (“**Wahsel**”, “**we**”, “**our**” or “**us**”), collect, store and process personal data about you. The purpose of this privacy policy (the “**Privacy Policy**”) is to describe how we use your personal data and what rights you have and how you can exercise those rights.

Throughout this Privacy Policy, the term “**processing**” is used to cover all activities involving your personal data, including e.g., collecting, handling, storing, sharing, accessing, using, transferring, and disposing of your personal data.

“**Applicable Data Protection Laws**” means all legislation and regulations, including regulations issued by relevant supervisory authorities, protecting the fundamental rights and freedoms of individuals and, in particular, their right to privacy with respect to the processing of personal data that from time to time apply to this Privacy Policy, including the Regulation (EU) 2016/679 of the European Parliament and of the Council 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 Directive 95/46/EC (the “**GDPR**”) as well as laws and regulations supplementing the GDPR.

“**Personal data**” means any information relating to an identified or identifiable natural person.

The “**retention period**” refers to the period during which we process your personal data for a certain purpose. Please note that the category of personal data in question (e.g., your name) may still be processed by us for other purposes, as outlined in section 4 below.

2 Who is the data controller for the personal data?

Wahsel is the data controller for the processing of your personal data as described in this Privacy Policy.

3 From where do we collect your personal data?

We collect your personal data **from yourself**. The personal data is collected when you announce that you wish to participate and when you participate in our surveys. You can always choose not to provide us with voluntary information. However, some personal data is necessary for us to carry out our survey and to provide you with remuneration for your participation. Not providing such personal data may prevent us from providing the survey to you.

We may also receive personal data from **our customers**. When we receive and process such personal data, we are the data controller for the processing of your personal data. Our customers are independent data controllers for the transfer of personal data to us and any previous processing activities.

4 Why do we process your personal data?

4.1 Registration for a panel

Wahsel process your personal data for the purpose of administering your membership in one of our panels, e.g., to be able to contact you, store basic information about you, administer, manage access to IT-systems and any other activities within the scope of your registration in a panel.

| Categories of personal data | Legal basis |
|---|---|
| <ul style="list-style-type: none"> > Contact details > Identity data (including personal identity number/coordination number) > Demographic data | <p><i>Contract.</i> The processing is necessary to fulfil the agreement with you.</p> <p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest in providing and managing the Wahsel panels.</p> |
| <p>Retention period</p> <hr/> <p>Your personal data is retained as long as you are a member in one of the Wahsel panels, and for a reasonable time thereafter (however not longer than two months) for the purpose of securely offboarding you and deleting your data from our programs and systems.</p> <p>Reports and statistics on an aggregated level (i.e., non-personal data) will be retained until further notice.</p> | |

4.2 General administration of the survey

Wahsel process your personal data for the purpose of administrating your participation in the survey, e.g., to be able to contact you, , administer and analyse the results of the survey/panel, manage access to IT-systems and any other activities within the scope of your participation in the survey.

| Categories of personal data | Legal basis |
|--|--|
| <ul style="list-style-type: none"> > Contact details > Identity data (including personal identity number/coordination number) > Demographic data > Recordings > Any information collected in a survey or panel relating to you | <p><i>Contract.</i> The processing is necessary to fulfil the agreement with you.</p> <p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest in providing and managing the survey.</p> |
| <p>Retention period</p> <hr/> <p>Your personal data is retained as long as you are an active participant in our panels, and for a reasonable time thereafter (however not longer than two months) for the purpose of securely offboarding you and deleting your data from our programs and systems.</p> <p>Recordings will be retained as long as necessary for the purpose but no longer than two years after the recording.</p> <p>Reports and statistics on an aggregated level (i.e., non-personal data) will be retained until further notice.</p> | |

4.3 Payment of remuneration

Wahsel processes your personal data for the purpose of administering the payment of your reimbursement for participating in the survey.

| Categories of personal data | Legal basis |
|---|---|
| <ul style="list-style-type: none"> > Contact details > Identity data (including personal identity number/coordination number) > Demographic data > Renumeration data | <p><i>Contract.</i> The processing is necessary to fulfil our agreement with you.</p> |
| <p>Retention period</p> <hr/> <p>Your personal data is retained as long as you are an active participant in our surveys, and for a reasonable time thereafter (however, no longer than two months) for the purpose of securely offboarding you and deleting your data from our programs and systems.</p> <p>Reports and statistics on an aggregated level (i.e., non-personal data) will be retained until further notice.</p> | |

4.4 Bookkeeping and compliance with applicable legislation

Wahsel processes your personal data for the purposes of bookkeeping and compliance with applicable legislation.

| Categories of personal data | Legal basis |
|--|---|
| <ul style="list-style-type: none"> > Contact details > Identity data (including personal identity number/coordination number) > Demographic data > Renumeration data | <p><i>Legal obligation.</i> The processing is necessary to comply with legal obligations to which Wahsel is subject regarding bookkeeping, e.g., the Accounting Act, and other related legislation.</p> |
| <p>Retention period</p> <hr/> <p>Personal data is retained for as long as necessary to fulfil the legal obligations that we are subject to.</p> <p>Reports and statistics on an aggregated level (i.e., non-personal data) will be retained until further notice.</p> | |

4.5 Marketing

Wahsel will process your personal data for the purposes of sending marketing e-mails.

| Categories of personal data | Legal basis |
|---|--|
| <ul style="list-style-type: none"> > Contact details > Identity data (including personal identity number/coordination number) > Demographic data > Information about your consent | <p><i>Consent.</i> We process your personal data for marketing purposes based on your consent thereto.</p> |

Retention period

Your personal data is retained for marketing purposes until you withdraw your consent to the processing for marketing purposes. You can at any time withdraw your consent.

5 Transfer of personal data

Other data controllers

We will share **the results** of the surveys (including recordings) with our customers. To the extent such results include personal data, the customer will be an independent data controller for such processing activities.

We may also share your personal data with others, if necessary. For example, we might share your personal data with potential purchasers and vendors. The purpose for this is to take necessary actions in connection with selling all or part of the business or in connection with a merger. Our legal basis for such processing is to fulfil our legitimate interest in being able to sell all or part of the business or in connection with a merger.

We might also share **the panel itself**, and any personal data related to it. The purpose is to provide other entities with the opportunity to provide you with additional surveys to participate in. We will only share your personal data with such third party if you have expressed your interest in participating in such survey conducted by a third party.

The recipient is the data controller for the processing of your personal data unless we have stated otherwise and is responsible for informing you about their processing activities.

Service providers

To fulfil the purposes of the processing of your personal data, we will transfer personal data to external parties such as service providers that we have engaged, such as our service provider of software and systems for managing surveys, panels and the data they contain as well as systems for data analysis. Other parties provide services within the areas of, inter alia, IT (such as assistance with surveys, data storage, support, and management services) and finance (e.g., book-keeping systems). These external parties will act as data processors of Wahsel and may only process your personal data in accordance with our instructions and not for their own purposes. Wahsel is the data controller for the processing of personal data that these external parties carry out on our behalf.

For research and statistical purposes, we prepare anonymous, aggregate, or generic data for a number of purposes. As we consider that a person cannot reasonably be identified from this information, we may share it with external parties such as our partners, advertisers, industry bodies, media and/or the general public. However, we do apply a restrictive approach to ensure a high level of security and safety.

5.1 Appropriate safeguards for transfers of personal data outside the EU/EEA

Wahsel uses suppliers and third-party providers to process personal data in a manner that includes transfer of personal data to countries outside of the EU/EEA area (so called “third countries”). These transfers are necessary for providing our services.

With these suppliers and partners, Wahsel has entered data processing agreements including provisions safeguarding such third country transfers with appropriate safety measures.

Transfers of personal data outside of the EU/EEA area will be processed/performed in accordance with Applicable Data Protection Laws, including the GDPR. Such transfers either rely upon an adequacy decision from the European Commission or legal safeguards through the European Commission’s Standard Contractual Clauses (SSC’s) for transfer of personal data outside of the EU/EEA area, combined with supplementary technological and organisational protection measures including encryption and anonymization/pseudonymization.

Should you have any questions regarding Wahsel’s transfers of personal data to countries outside the EU/EEA area, please contact us by using the contact details provided at the end of this Privacy Policy. You are entitled to receive a copy of any documentation demonstrating that appropriate safeguards have been taken to protect your personal data during a transfer to a third country.

To learn more about third country transfers, please read [here](#).

6 Your rights

Under Applicable Data Protection Laws, you have certain rights in relation to the processing of your personal data. We process your personal data to the extent necessary to fulfil your rights. Please submit requests for exercising your rights by contacting us using the contact details set out below.

You have, under certain circumstances, the right to exercise the following rights:

| | |
|-------------------------------------|---|
| Access | You may request confirmation whether personal data about you is processed by us and, if that is the case, access your personal data and additional information regarding the operation, such as the purposes of the processing. You are also entitled to receive a copy of the personal data undergoing processing. |
| Object to certain processing | You have the right to object to the processing of your personal data based on a legitimate interest for reasons which concern your particular situation. In such a situation, we will stop using your personal data where the processing is based on a legitimate interest, unless we can show that the interest overrides your privacy interest or that the use of your personal data is necessary to manage or defend legal claims. |
| Rectification | You have the right to obtain from us the rectification of inaccurate personal data concerning you. |
| Erasure | You may have your personal data erased under certain circumstances, such as when your personal data is no longer needed for the purposes for which it was collected. |
| Restriction of processing | You may ask us to restrict the processing of your personal data to only comprise storage of your personal data under certain circumstances, such as when the processing is unlawful, but you do not want your personal data erased. |
| Withdrawal of consent | You have the right to at any time withdraw your consent to the processing of personal data to the extent the processing is based on your consent. |
| Data Portability | You have the right to receive the personal data concerning you which you have provided to us, in a structured, commonly used, and machine-readable format |

and ask for the information to be transferred to another data controller (where possible).

Click [here](#) to read more about the rights that you have in relation to the processing of your personal data.

Complaints to the supervisory authority

In case of any complaints regarding Wahsel’s privacy practices, you have the right to lodge a complaint with the competent supervisory authority. For more information, please visit the relevant authority’s website. In Sweden, the supervisory authority is the Swedish Data Protection Authority (Integritetsskyddsmyndigheten). You can learn more about how to lodge a complaint with the Swedish Data Protection Authority [here](#). In Finland, the supervisory authority is the Office of the Data Protection Ombudsman. You can learn more about how to lodge a complaint with the Office of the Data Protection Ombudsman [here](#). In Denmark, the supervisory authority is Datatilsynet. You can learn more about how to lodge a complaint with Datatilsynet [here](#). In Norway, the supervisory authority is Datatilsynet. You can learn more about how to lodge a complaint with Datatilsynet [here](#).

7 Contact us

If you have any questions or concerns regarding the processing of your personal data, please contact us at info@wahsel.com. When contacting us to exercise any of your rights under Applicable Data Protection Laws, we might require you to verify your identity before allowing you to exercise such rights.

8 Changes to this Privacy Policy

Periodically, we may update this Privacy Policy when we e.g., change our processing routines. When we do this, we will take all reasonable measures to inform you of such updates (unless the changes made are non-material or insignificant). If you have any questions regarding our use of your personal data, do not hesitate to contact us by using the contact details in section 7.

This Privacy Policy was last updated: 2024-09-19.

9 Description of categories of personal data

Please see the table below for detailed information regarding what personal data we process.

| Category of personal data | Examples of personal data |
|----------------------------------|---|
| <i>Contact details</i> | Address, telephone number, e-mail address. |
| <i>Demographic data</i> | Sex, marital status, citizenship, language, age, gender. |
| <i>Identity data</i> | Employment number, personal identity number, coordination number, user identity, registration number, IP address, location data, signature, name, ID/visa/passport, password. |

| | |
|---|--|
| <i>Remuneration data</i> | Bank account, remuneration history. |
| <i>Any information collected in a survey or panel relating to you</i> | The information you provide to us by answering the survey. |
| <i>Recordings</i> | Any personal information collected in recorded communications with us. |