Privacy policy

OperationTulip AB



Scope of processing personal data

We only collect and use your personal data to the extent necessary to provide a functioning website together with our content and services. We do not sell, trade, transfer or share any identifiable information with outside parties without explicit consent of the user. We only collect data with your consent (eg. when you sign up or pay for our services). An exception applies when we are unable to get your consent and processing the data is permitted by law.

Cookies

We don't like the use of cookies, so we use them as little as possible. To measure the visits on the website, we use Koko analytics, which do not share any data with any 3rd party. Nextcloud also use session cookies to keep the service functioning, no personal data collected or stored.

Legal basis for processing personal data

We only process your personal data on the following legal grounds:

- Consent
- Contractual performance or pre-contractual measures
- Legal obligations
- When this is necessary to safeguard a legitimate interest of our company or of a third party and when the interests and fundamental rights and freedoms of the stakeholder do not outweigh the former interest.

Deletion of data and storage period

Your personal data will be deleted or blocked as soon as the purpose of storage is fulfilled (eg. when the contract is terminated or a support issue is closed). We will furthermore store information about you when deletion conflicts with a legal obligation to store data, e.g. derived from the applicable Tax Code or other laws.

Description and scope of data processing

When you register on the website, we will process personal data on you if you decide to register your e-mail address. Personal data will not be shared with any 3rd parties and we store all your data on servers in Sweden. We collect the following data in the course of the registration process:

- The user's IP address
- E-mail address if you decide to provide this information

Processing of your personal data will be done when it is necessary for contract, performance or a pre-contractual measure. This can, however, also take place based on your consent.

Your registration is necessary in order to perform the contract or to carry out a pre-contractual measure. This is necessary for us to provide the content and services on our website. Your personal data will be deleted when the purpose for storing that data is fulfilled. When the collection and

processing of your personal data is necessary for a pre-contractual measure or for performance of the contract, we are then obliged to observe statutory storage periods. In such case, deletion is not possible until expiry of this period.

E-mail contact

Our website also contains a possibility to e-mail us, to contact us in electronic form. The following data will be stored as part of the contact process:

- E-mail address
- Name

You consent to the processing of your data as part of the transmisson procedure and we will refer to this privacy policy where ever we provide a means of contacting us.

Your e-mail is processed by us. Information provided by you is used for processing the conversation. Your consent forms the legal basis for the data processing. The email conversation is deleted once the purpose of the data processing has been achieved (eg. when a support issue is resolved). A statutory storage period may possibly prevent immediate deletion. You can revoke the consent you have given us.

Storage

We provide a service with which you can store and share your personal data. The data is stored in our data center in Sweden and will never be used for any other purpose than providing the storage which you pay for. We will not access your stored data, nor will we make it available for others, unless Swedish law requires us to do so. If you share files with others, they will see some basic information about who shared this information with them. We will permanently delete all data you have stored with us 90 days after the service contract has ended.1

Encryption used to protect your identifiable information

On our website and in our web-shop we use TLS encryption to protect your data from any unauthorised third parties from "listening in".

Rights of data subjects

You are a data subject (user) and you have the following rights with regard to us:

- 1. You can request information about which personal data of which origin is stored about you and for which purposes we process that information. You also have the right to be informed when your data is passed on to third parties. In this case you can be informed about the identity of the recipient or the categories of recipients.
- 2. Should your personal data be incorrect or incomplete, you can request correction or addition.
- 3. You can object to the processing of your personal data for advertising purposes. This is however unnecessary because we will never use your data to that end.
- 4. You have the right to limit processing:
- a. If you contest the correctness of the personal data relating to you for a period that enables the responsible party to check the correctness of the personal data;
- b. if the processing is unlawful and you reject the deletion of the personal data and instead request limitation of the use of the personal data;

- c. if the responsible party no longer requires the personal data for the purposes of the processing, you however require this data for the establishment, exercise or defence of legal claims, or when you have lodged an objection to the processing under Art. 21 (1) GDPR and it is not yet clear whether the proper reasons of the responsible party prevail over your reasons.
- 5. You can request the deletion of your personal data. This is possible when the legal basis for the data processing is not given or has ceased to exist. The same applies when the purpose of the data processing is no longer given due to time elapsed or other reasons. Please note that deletion of data may be prevented by an existing storage period or other protection-worthy interests of our company. We will be happy to inform you of this on request. Should we have made your data public, we are obliged to inform each recipient that you have requested the deletion of all links to this personal data or links to copies of this personal data.
- 6. Furthermore, you have a right of objection if your protection-worthy interest due to a personal situation outweighs the interest of the data processing. This does not apply if we are obliged to conduct the processing on the basis of a statutory regulation.
- 7. Irrespective of any other regulatory or judicial constraints, you have the right to file a complaint to a supervisory authority if you believe that the processing of personal data relating to you is in violation of data protection rules.
- 8. You have the right to receive personal data relating to you, which you have supplied to the responsible party, in a structured, accessible and machine-readable format. This only applies to the data we have in our administration. Data you store using our service will never be accessed by us and you can always retrieve it using the sync client. It is therefore unnecessary to have us do that for you.

If you wish to exercise your rights, or if you have any questions about this policy, please contact us at support@operationtulip.com

Changes

This privacy policy is subject to change. As long as we have your mail address, we will tell you when this happens. Changes to the privacy policy will also be announced on our blog to make sure that users who do not register an email address will have the possibility to be alerted about changes in the policy.