

Evoko Privacy Policy

Evoko takes data privacy seriously. This privacy policy explains who we are, how we collect, share and use Personal Information as Data Controller, and how you can exercise your privacy rights.

We recommend that you read this privacy policy in full to ensure you are fully informed. However, to make it easier for you to review the parts of this privacy policy that apply to you, we have divided up the document into sections that are specifically applicable to Contacts (Section A), and Visitors (Section B). Section C is applicable to everyone, including Members.

If you have any questions or concerns about our use of your Personal Information, then please contact us using the contact details provided at the end of Section C.

About Us

Evoko is a technology company providing audio visual products and equipment (the "Services") operated by Smart Media Solutions (SMS), a company headquartered in Stockholm, Sweden ("we," "us," "our," and "Evoko").

The Services/Products are mainly used within corporate and business environments for meetings and internal communication. We also provide other related services, such as support and subscription of meeting room services. Find out more about our Services here (<https://www.evoko.se/>).

Key Terms

In this privacy policy, these terms have the following meanings:

"Contact" is a person a Member may contact through our Services. In other words, a Contact is anyone on a Member's Distribution List or about whom a Member has given us information. For example, if you are a Member, a subscriber to your email marketing campaigns would be considered a Contact.

"Distribution List" is a list of Contacts a Member may upload or manage on our platform and all associated information related to those Contacts (for example, email addresses).

"Member" means any person or entity that is registered with us to use the Services.

"Distributors & Resellers" means any person or entity that is registered or works with us as a partner.

"Personal Information" means any information that identifies or can be used to identify a Member, a Contact, or a Visitor, directly or indirectly. Examples of Personal Information include, but are not limited to, first and last name, date of birth, email address, gender, occupation, or other demographic information.

"Website(s)" means any website(s) we own and operate (such as www.evoko.se) or any web pages, interactive features, applications, widgets, blogs, social networks, social network "tabs," or other online, mobile, or wireless offerings that post a link to this privacy policy.

"Visitor" means any person who visits any of our Websites.

"you" and **"your"** means, depending on the context, either a Contact, or a Visitor.

Section A. Privacy for Contacts

This section applies to the information we process about our Contacts as a data controller pursuant to our legitimate business interests, as explained in the "Legal Basis for Processing" section below. As a result, for much of the Personal Information we collect and process about Contacts through the Services, we act as a processor on behalf of our Partners. Evoko is not responsible for the privacy or security practices of our Distributors & Resellers, which may differ from those set forth in this privacy policy. Please check with individual Distributors & Resellers about the policies they have in place. For purposes of this section, "you" and "your" refer to Contacts.

1. Information We Collect

The Personal Information that we may collect or receive about you broadly falls into the following categories:

- i. Information we collect automatically: When you interact with an email campaign that you receive from us or browse our website or complete a pop up widget/form, we may collect information about your device and interaction with an email. We use cookies and other tracking technologies to collect some of this information. Our use of cookies and other tracking technologies is discussed more below.
- ii. Information we collect from other sources: From time to time, we may obtain information about you from third-party sources, such as social media platforms and third-party data providers. We take steps to ensure that such third parties are legally or contractually permitted to disclose such information to us.

2. Use of Personal Information

We may use the Personal Information we collect or receive about you for our legitimate business interests, including:

- To enforce compliance with our Terms of Use and applicable law. This may include developing tools and algorithms that help us prevent violations.
- To protect the rights and safety of our Distributors & Resellers and third parties, as well as our own.
- To meet legal requirements, including complying with court orders, valid discovery requests, valid subpoenas, and other appropriate legal mechanisms.
- To provide information to representatives and advisors, including attorneys and accountants, to help us comply with legal, accounting, or security requirements.
- To prosecute and defend a court, arbitration, or similar legal proceeding.
- To respond to lawful requests by public authorities, including to meet national security or law enforcement requirements.
- To provide, support and improve the Services. For example, this may include sharing your information with third parties in order to provide and support our Services or to make certain features of the Services available to our Distributors & Resellers.
- For our data analytics projects. Our data analytics projects use data from your Personal Information, to provide and improve the Services. We use information, like your purchase history, provided to us by Distributors & Resellers, so we can make more informed predictions, decisions, and products for our Partners. If you prefer not to share this data, you can opt out of data analytics projects at any time by emailing us at marketing@evoko.se.
- Other purposes. To carry out other legitimate business purposes, as well as other lawful purposes.

3. Cookies and Tracking Technologies

We and our partners may use various technologies to collect and store information when you interact with an email campaign or the Evoko Website, and this may include using cookies and similar tracking technologies, such as pixels and web beacons. For example, we use web beacons in the emails we send on through Mailchimp. When you receive and engage with a campaign, web beacons track certain behavior such as whether the email sent through the MailChimp platform was delivered and opened and whether links within the email were clicked. They also allow us to collect information such as your IP address, browser, email client type, and other similar details. We use this information to measure the performance of our email campaigns, and to provide analytics information and enhance the effectiveness of our Services.

4. Legal Basis for Processing

We process Personal Information about you as a data controller as described in this section, where such processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. Our legitimate interests typically include: improving, maintaining, providing, and enhancing our technology, products and services; ensuring the security of the Services and our Website; and for our marketing activities.

5. Other Data Protection Rights

You may have the following data protection rights:

- To access, correct, update or request deletion of your Personal Information. Evoko takes reasonable steps to ensure that the data we collect is reliable for its intended use, accurate, complete, and up to date. You may contact us directly at any time about accessing, correcting, updating or deleting your Personal Information, or altering your data, by emailing us at marketing@evoko.se. We will consider your request in accordance with applicable laws.
- In addition, if you are a resident of the EEA, you can object to processing of your Personal Information, ask us to restrict processing of your Personal Information or request portability of your Personal Information. Again, you can exercise these rights by emailing us at marketing@evoko.se.
- You have the right to complain to a data protection authority about our collection and use of your Personal Information. For more information, please contact your local data protection authority. Contact details for data protection authorities in the EEA are available here (http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm). If you no longer want to be contacted by one us, please unsubscribe directly from the newsletter or contact the us directly to update or delete your data. If you contact us directly, we may remove or update your information within a reasonable time.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. We may ask you to verify your identity in order to help us respond efficiently to your request.

Section B. Privacy for Visitors

This section applies to Personal Information that we collect and process through our Websites and in the usual course of our business, such as in connection with our recruitment, events, sales and marketing activities. In this section “you” and “your” refers to Visitors.

1. Information We Collect

- Information you provide to us on the Websites or otherwise:** Certain parts of our Websites may ask you to provide Personal Information voluntarily. For example, we may ask you to provide certain Personal Information (such as your name, contact details, company name, country) in order to sign up for to our newsletter, or otherwise submit inquiries to us or request contact. We may also collect Personal Information, such as your contact and job details and feedback, when you attend our events, take part in surveys, or through other business or marketing interactions we may have with you. You may choose to provide additional information when you communicate with us or otherwise interact with us, and we will keep copies of any such communications for our records. The Personal Information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your Personal Information. We will also let you know prior to collection whether the provision of the Personal Information we are collecting is compulsory or may be provided on a voluntary basis and the consequences, if any, of not providing the information.

- ii. **Information we collect automatically through the Websites:** When you visit our Websites, we may also collect certain information automatically from your device. In some countries, including countries in the European Economic Area, this information may be considered Personal Information under applicable data protection laws.

2. Use of Personal Information

We may use the information we collect through our Websites for a range of reasons, including:

- To provide, operate, optimize, and maintain our Websites.
- To send you information for marketing purposes, in accordance with your marketing preferences.
- For recruitment purposes if you have applied for a role with Evoko.
- To respond to your online inquiries and requests, and to provide you with information and access to resources or services that you have requested from us.
- To manage our Websites and system administration and security.
- To improve the navigation and content of our Websites.
- To identify any server problems or other IT or network issues.
- To process transactions and to set up online accounts.
- To compile aggregated statistics about site usage and to better understand the preferences of our Visitors.
- To carry out research and development to improve our products and services.
- To customize content and layout of the Websites.
- To carry out other legitimate business purposes, as well as other lawful purposes.

In addition, we may combine Personal Information with other information we collect or obtain about you (such as information we source from our third-party partners) to serve you specifically, such as to deliver a product or service according to your preferences or restrictions, or for advertising or targeting purposes in accordance with this privacy policy. When we combine Personal Information with other information in this way, we treat it as, and apply all of the safeguards in this privacy policy applicable to, Personal Information.

3. Public Information and Third-Party Websites

- **Blog.** We have public blogs on our Websites. Any information you include in a comment on our blog may be read, collected, and used by anyone. If your Personal Information appears on our blogs and you want it removed, contact us at marketing@evoko.se. If we are unable to remove your information, we will tell you why.
- **Social media platforms and widgets.** Our Websites include social media features, such as the Facebook Like button. These features may collect information about your IP address and which page you are visiting on our Website, and they may set a cookie to make sure the feature functions properly.
- **Links to third-party websites.** Our Websites include links to other websites, whose privacy practices may be different from ours. If you submit Personal Information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit.
- **Contests and sweepstakes.** We may, from time to time, offer surveys, contests, sweepstakes, or other promotions on our Websites or through social media (collectively, "Promotions").

4. Cookies and Tracking Technologies

We use cookies and similar tracking technologies to collect and use Personal Information about you, including to serve interest-based advertising. For further information about the types of cookies and tracking technologies we use, why, and how you can control them, please see our Cookie Statement above.

5. Other Data Protection Rights

You have the following data protection rights:

- To access, correct, update, or request deletion of your Personal Information. Evoko takes reasonable steps to ensure that the data we collect is reliable for its intended use, accurate, complete, and up to date. You may contact us directly at any time about accessing, correcting, updating, or deleting your Personal Information, or altering your data or marketing preferences by emailing us at marketing@evoko.se. We will consider your request in accordance with applicable laws.
- In addition, if you are a resident of the EEA, you can object to processing of your Personal Information, ask us to restrict processing of your Personal Information or request portability of your Personal Information. Again, you can exercise these rights by emailing us at marketing@evoko.se.
- Similarly, if we have collected and processed your Personal Information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your Personal Information. For more information, please contact your local data protection authority. Contact details for data protection authorities in the EEA are available here (http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm). We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. We may ask you to verify your identity in order to help us respond efficiently to your request.

Section C – General Information

1. Legal Basis for Processing Personal Information (EEA Persons Only)

If you (for purposes of this section, “you” and “your” refer to Members, Contacts, and Visitors unless otherwise indicated): are from the European Economic Area, our legal basis for collecting and using the Personal Information described above will depend on the Personal Information concerned and the specific context in which we collect it.

In most cases we will collect and use Personal Information from you based on our **legitimate interests** in such processing where such legitimate interests are not overridden by your data-protection interests or fundamental rights and freedoms. Typically, our legitimate interests include improving, maintaining, providing, and enhancing our technology, products, and services; ensuring the security of the Services and our Websites; and for our marketing activities.

In some limited cases, we might base our processing on our **legal obligation** to collect Personal Information from you. If we ask you to provide Personal Information to comply with a legal requirement or to perform a contact with you, we will make this clear at the relevant time and advise you whether the provision of your Personal Information is mandatory or not, as well as of the possible consequences if you do not provide your Personal Information.

Where required by law, we will collect Personal Information based only on your explicitly given **consent** to do so.

If you have questions about or need further information concerning the legal basis on which we collect and use your Personal Information, please contact us using the contact details provided in the “Questions and Concerns” section below.

2. How We Share Information

We may share and disclose your Personal Information to the following types of third parties for the purposes described in this privacy policy.

- i. Our service providers: Sometimes, we share your information with our third-party service providers, who help us provide and support our Services and other business-related functions.
- ii. Advertising partners: We may partner with third-party advertising networks and exchanges to display advertising on our Websites or to manage and serve our advertising on other sites and may share Personal Information with them for this purpose.
- iii. Any competent law enforcement body, regulatory body, government agency, court or other third party where we believe disclosure is necessary (a) as a matter of applicable law or regulation, (b) to exercise, establish, or defend our legal rights, or (c) to protect your vital interests or those of any other person.
- iv. A potential buyer (and its agents and advisors) in the case of a sale, merger, consolidation, liquidation, reorganization, or acquisition.
- v. Any other person with your consent, as explained under Legal Basis for Processing Personal Information above.
- vi. Our Distributors and Resellers in order for them to be able to contact and sell our products and services to you.

3. Your Choices and Opt-Outs

Members and Visitors who have opted in to our marketing emails can opt out of receiving marketing emails from us at any time by clicking the “unsubscribe” link at the bottom of our marketing messages. Also, all opt-out requests can be made by emailing us using the contact details provided in the “Questions and Concerns” section below. Please note that some communications (such as service messages, account notifications, billing information) are considered transactional and necessary for account management, and buyers cannot opt out of these messages unless you cancel your Evoko account.

4. Our Security

We take appropriate and reasonable technical and organizational measures to protect Personal Information from loss, misuse, unauthorized access, disclosure, alteration, and destruction, taking into account the risks involved in the processing and the nature of the Personal Information. If you have any questions about the security of your Personal Information, you may contact us at marketing@evoko.se.

5. International Transfers

- i. **We operate in the United States & Europe**
Our servers and offices are located in the United States and Sweden, so your information may be transferred to, stored, or processed in the United States or Europe. While the data protection, privacy, and other laws of the Europe and the United States might not be as comprehensive as those in your country, we take many steps to protect your privacy
- ii. **Data transfers from Switzerland or the EU to the United States and other third countries**
The information you provide to us may be shared with our colleagues and partners in countries outside of the EU/EEA. When we transfer your Personal Information to countries outside of the EU/EEA, we ensure that the recipients offer an adequate level of protection, either by belonging to a country which the European Commission has decided ensures an adequate level of protection, or (for example in case of the United States) by having entered into agreements with Evoko which include Standard Contractual Clauses (SCC) for the transfer of data, as approved by the European Commission (Art. 46.2 of the General Data Protection Regulation (EU) 2016/679).

6. Retention of Data

We retain Personal Information where we have an ongoing legitimate business or legal need to do so. Our retention periods will vary depending on the type of data involved, but, generally, we'll refer to these criteria in order to determine retention period:

- Whether we have a legal or contractual need to retain the data.
- Whether the data is necessary to provide our Services.

When we have no ongoing legitimate business need to process your Personal Information, we will either delete or anonymize it or, if this is not possible (for example, because your Personal Information has been stored in backup archives), then we will securely store your Personal Information and isolate it from any further processing until deletion is possible.

7. California Privacy

Under California Law, California residents have the right to request in writing from businesses with whom they have an established business relationship, (a) a list of the categories of Personal Information, such as name, email, and mailing address, and the type of services provided to the customer that a business has disclosed to third parties (including affiliates that are separate legal entities) during the immediately preceding calendar year for the third-parties' direct marketing purposes, and (b) the names and addresses of all such third parties. To request the above information, please email us at marketing@evoko.se.

8. Changes to this Policy

We may change this privacy policy at any time and from time to time. The most recent version of the privacy policy is reflected by the version date located at the top of this privacy policy. All updates and amendments are effective immediately upon notice, which we may give by any means, including, but not limited to, by posting a revised version of this privacy policy or other notice on the Websites. We encourage you to review this privacy policy often to stay informed of changes that may affect you. Our electronically or otherwise properly stored copies of this privacy policy are each deemed to be the true, complete, valid, authentic, and enforceable copy of the version of this privacy policy that was in effect on each respective date you visited the Website.

9. Questions & Concerns

If you have any questions or comments, or if you have a concern about the way in which we have handled any privacy matter, please contact us by postal mail or email at:

For EEA Residents:

For the purposes of EU data protection legislation, Smart Media Solutions, Evoko is the controller of your Personal Information. Our Data Protection Officer can be contacted at marketing@evoko.se.

For Non-EEA Residents:

Evoko Unlimited AB
Attn. GDPR Officer
marketing@evoko.se
Hästholmsvägen 32, 5th floor
131 30 Nacka, Sweden
Phone +46 8 522 567 50