

Artificial Solutions | Online Privacy Notice

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Artificial Solutions is committed to protecting your privacy and ensuring the highest level of security for your personal information. This Privacy Notice explains the types of personal information we collect, how we use that information, who we share it with, how we protect that information and your legal rights. This Privacy Notice ("**Notice**") applies to Artificial Solutions and its programmes, its subdomains, and all services and features related to these programmes and subdomains (the "**Services**").

Please read the following carefully to understand our views and practices regarding your personal information.

1. Who are we?

For the purposes of applicable data protection laws, the Data Controller is Artificial Solutions International AB, with registered office at Stureplan 15, 2nd floor, 111 45 Stockholm, Sweden, with organization number 556840-2076.

This Privacy Notice covers all personal information processed by Artificial Solutions which means information that (either in isolation or in combination with other information) enables you to be identified directly or indirectly. The process complies with the principles and rights contained in the General Data Protection Regulation 2016/679

2. What information do we collect from you?

We may collect information about you from the following sources:

2.1 Information we receive from you

We may collect personal information, such as your name, postal address, e-mail address, job title, telephone number, and all other personal information that may be provided by you. This personal information is provided to us when you:

- register on www.artificial-solutions.com and www.teneo.ai or any other company websites ("**our Websites**") to access our resources (such as white papers, case studies and webinars);
- use any of our Services or Products
- sign an Agreement with us to access to our Services;
- create an account to use any of our Products;
- create an account in our websites to use a functionality we make available;
- contact us.

2.2 Personal Data we collect from other sources

We may also collect information about you from other sources including third parties and from publicly available information. We may combine this information with Personal Data provided by you. This helps us update, expand, and analyze our records, identify new customers, and create more tailored advertising to provide services that may be of interest to you. The Personal Data we may collect from other sources includes identifiers, professional or employment-related information, education information, commercial information, visual information, internet activity information, and inferences about preferences and behaviors. In particular, we collect such Personal Data from the following sources:

- Third party providers of business contact information, including mailing addresses, job titles, email addresses, phone numbers, intent data (or user behavior data), IP addresses,

social media profiles, LinkedIn URLs and custom profiles, for purposes of targeted advertising, delivering relevant email content, event promotion and profiling, determining eligibility and verifying contact information;

- Another individual at your organization who may provide us with your personal information, which may include Personal Data and special categories of Personal Data, to the extent you consent to providing it and sharing it, for the purposes of obtaining services and assessing our goals related to encouraging diversity within our vendors; and
- Platforms such as GitHub to manage code check-ins and pull requests. If you participate in an open source or community development project, we may associate your code repository username with your community account so we can inform you of program changes that are important to your participation or relate to additional security requirements.

2.3 Information we collect about you

When you visit our websites or use a functionality we make available, we may use cookies and other technologies to automatically collect the following information:

- Technical information, including your IP address, your login information, browser type and version, device identifier, location and time zone setting, browser plug-in types and versions, operating system and platform, page response times, and download errors;
- Information about your visit and products you viewed or searched for;
- Device data, for example the type and model of the device you are using, its operating system and version, its unique identifier, crash data (if applicable), and what settings you've enabled. Your device and software settings affect what information your device makes available to us;
- Log data, which is automatically recorded by our servers based on data sent by your app or browser. This typically includes the date and time you visited, the browser or app version you used (and its settings), the URLs you came from and go to, your IP address and protocol, and how you used the functionality we make available;
- Cookie data, which comes from "cookies" (small data files stored on your computer or mobile device) and similar technologies. Cookie data helps us recognize you, remember your preferences, and learn more about you; some, but not all, cookie data is associated with the functionality we make available. You can configure your browser to reject cookies, but doing so will prevent you from logging into our website. To learn more about our use of cookies, web beacons, and similar technologies, click here to read our <https://www.artificial-solutions.com/cookie-policy>;
- Length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouseovers) and methods used to browse away from the page; and
- Information from third parties and public sources. When you use some of the functionality, we make available, we may retrieve information from third parties and partners to provide us with information such as location information, nearby places and restaurants, weather data.
- When using Artificial Solutions online education and training applications the following data is stored so we can provide you with an acceptable learning experience:
 - Logs (within a third-party application call Moodle) contain detailed information about user activity within each course, including the date and time of when course-specific information was viewed and/or updated, the address of the machine from which the access was made, the browser identification information and information about the referring web page. These logs are used to create summary statistics which may be made internally available. Summary statistics do not include personal data.
 - The Moodle system contains information about contributions to courses, including contributions to chat rooms and discussion forums, ownership of resources,

assignment/file submissions, text matching scores and evidence of participation in other Moodle-based activities.

- Information and data related to users, including grades, feedback comments, scores, completion data, access rights and group membership is also recorded.
- Additional personal data may be held within individual courses, either within documents/resources uploaded to the course, or within activities within the course. Other than contributions to chat rooms and discussion forums which are submitted by individuals in a personal capacity, course maintainers are responsible for the information held about you that may be uploaded onto such courses.

3. How do we use your personal information?

We process the following information:	For the following purposes:	Based on the following justification:
Name, address, email address, password, company, job title, date of birth, country, phone number, industry	<p>To verify your identity.</p> <p>To set up and manage your account.</p> <p>To protect the security and integrity of our websites and functionality we make available.</p> <p>To improve your experience on our websites and functionality we make available.</p> <p>To contact you when necessary or appropriate.</p> <p>To ensure that we do not contact you if you have asked us not to. We keep records of your preferences to do this.</p>	<p>We may use your information in these ways as this is necessary for us to perform our contractual obligations towards you. We also have a legitimate interest in processing your information to maintain our relationship with you.</p> <p>We have a legitimate interest in processing this information to ensure that we do not send you marketing communications if you do not want to receive it.</p>
Personal information you disclose in emails sent by you to Artificial Solutions and in chat conversations between you and a functionality we make available.	To respond to your comments and questions.	We may process this information because it is necessary for us to perform our contractual obligations towards you and respond to your enquiries.
Within our online training and education applications built with a learning management system (LMS) called Moodle	<p>Provide account access and be identifiable within the LMS.</p> <p>Provide access to papers/sites within the LMS.</p> <p>Provide the ability to upload, amend and delete certain information within the LMS.</p> <p>Provide access to information, resources and activities uploaded to the LMS.</p> <p>Control access to different parts of the LMS.</p> <p>Help support LMS users.</p> <p>For system administration and bug tracking.</p> <p>Report on course, resource and activity access, activity</p>	To ensure we meet the objectives of the personnel signing up for such courses and that an acceptable learning experience is delivered.

	<p>completion, course completion and course data (such as grades, scores, submissions and content uploaded).</p> <p>For producing usage statistics for management and planning purposes.</p>	
Anonymized or pseudonymized information	<p>To improve the software products developed by Artificial Solutions e.g. to train machine learning algorithms, improve product features or create new products that are developed and sold by Artificial Solutions. However, log data is never provided directly to clients of Artificial Solutions.</p>	<p>We have a legitimate interest in processing this information to improve our products.</p>

In addition to the above, we may process any of the information relating to you in order to comply with legal requirements that apply to us (such as tax and financial reporting requirements).

With your permission, we may send you carefully selected information about our products and services. You have the right to opt out receiving direct marketing at any time.

4. How do we protect and store your personal information?

We have implemented technical and organisational security measures to safeguard your personal information in our custody or control. Such measures include, for example, limiting access to personal information only to employees and authorized service providers who need to know such information for the purposes described in this Privacy Notice, as well as other administrative, technical and physical safeguards.

In using some of the functionalities we make available, you may come across links to websites and services operated by third parties. These third parties have their own privacy policies, which will apply to your activity if you click on the link or access their website or service. We do not accept any responsibility or liability for such external sites' privacy and security practices.

While we endeavour to protect our systems, sites, operations and information against unauthorized access, use, modification, and disclosure, due to the inherent nature of the Internet as an open global communications vehicle and other risk factors, we cannot guarantee that any information, during transmission or while stored on our systems, will be absolutely safe from intrusion.

Your data may be stored with third parties acting as Processors, for the purposes of the GDPR, whose security measures at least represent the same security standard as in Artificial Solution. If you want to know more about their security measures when they process your information on our behalf, please contact us at the details set out below.

5. How long do we keep your personal information?

We keep your information only so long as we need it to provide the Artificial Solutions services to you and fulfil the purposes described in this Notice. This is also the case for anyone that we share your information with and who carries out services on our behalf. When we no longer need to use your information and there is no need for us to keep it to comply with our legal or regulatory obligations, we will either remove it from our systems or anonymize all your personal data it so that it cannot be linked to you.

6. With whom may we share your personal information?

Your personal information is intended for Artificial Solutions but may be shared with third parties in certain circumstances:

Artificial Solutions' group of companies: We may share your personal information among our group of companies, including our subsidiaries, our head office and branches, in order to open your account with us, administer our services and products, provide you with customer support, understand your preferences, provide, maintain and improve functionality we make available, send you information about our products and services that may be of interest to you and conduct the other activities described in this Privacy Notice.

Our service providers: We use other companies, agents or contractors to perform services on our behalf or to assist us with the provision of Artificial Solutions' services and products to you. We may share personal information with the following categories of service provider:

- infrastructure and IT service providers, including for email archiving.
- external auditors and advisers.

While providing such services, these service providers may have access to your personal information. However, we will only provide our service providers with personal information which is necessary for them to perform their services, and we require them not to use your information for any other purpose. We will use our best efforts to ensure that all our service providers keep your personal information secure.

Third parties required or permitted by law: In certain circumstances, we may be required to disclose or share your personal information in order to comply with a legal or regulatory obligation (for example, we may be required to disclose personal information to the police, regulators, government agencies or to judicial or administrative authorities).

We may also disclose your personal information to third parties where disclosure is both legally permissible and necessary to protect or defend our rights, matters of national security, law enforcement, to enforce our contracts or protect your rights or those of the public.

Third parties connected with business transfers: We may transfer your personal information to third parties in connection with a reorganization, restructuring, merger, acquisition or transfer of assets, provided that the receiving party agrees to treat your personal information in a manner consistent with this Privacy Notice.

We will not sell, trade or rent your personal information to third parties.

If you are a resident in the European Union, be aware that your personal information may be transferred to and processed outside of the European Union, by ourselves, our affiliates and our service providers. We will take all steps that are reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy Notice and the General Data Protection Regulation (EU) 2016/679 requirements for data transfers outside the European Union, by using tools such as Data Processing Addendums, Standard Contractual Clauses, Adequacy Decisions, International Treaties and your consent.

By continuing to use some functionality we make available, you understand that we may transfer and store your data outside your home country, including to and in the US, as described in this Notice. The privacy protections and the rights of authorities to access your personal information in some of these countries may not be the same as in your home country; the functionality we make available will only transfer personal data as permitted by law and will take steps intended to ensure appropriate protection of your personal information. If you have questions, please contact us at the details set out below.

7. What are your rights?

You have the following rights available to you:

- **Access the information we hold about you.** We'll usually share this with you within 30 days of you asking us for it. With some of the functionalities we make available you can also ask 'what do you know about me' to see an overview of your account.
- **Correction or deletion of the information we hold about you.** If your information is incomplete or inaccurate, or you would like us to delete your information, please contact us using the details set out below. Unless we need to retain such data to comply with a legal obligation or to establish, exercise or defend legal claims. Bear in mind we cannot warranty accuracy of your personal data unless you provide us with the correct information.
- **Restriction of our processing of your personal information.** You can do this where you believe such data to be inaccurate; our processing is unlawful; or that we no longer need to process such data for a particular purpose, or because you do not want us to delete it.
- **Portability.** You can ask for the personal information we hold about you to be provided in a structured, electronic format, and sent to another data controller where it's technically feasible, where this is (a) personal information which you have provided to us, and (b) we are processing that data on the basis of your consent or to perform a contract with you.
- **Right to object.** Where the legal justification for our processing of your personal information is our legitimate interest, you can object to such processing on grounds relating to your particular situation. We will stop processing your data unless we have compelling legitimate grounds for the processing which override your interests and rights, or if we need to continue to process the data for the establishment, exercise or defence of a legal claim.
- **Right to withdraw consent.** If you have consented to our processing of your personal information, you can withdraw your consent at any time, free of charge This includes cases where you wish to opt out from marketing messages that you receive from us.

You can make a request to exercise any of these rights in relation to your personal information by sending the request by mail to our group DPO, María Carrillo at Stureplan 15, 2nd floor, 111 45 Stockholm, Sweden, or by email to LegalCompliance@artificial-solutions.com.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within one month.

Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

You also have the right to lodge a complaint with the local data protection authority if you believe that we have not complied with applicable data protection laws. If you are based in, or the issue you would like to complain about took place, in the EEA, please click [here](#) for a list of local data protection authorities in the other EEA countries. If you are based in the UK or Switzerland, your local data protection authorities are the UK Information Commissioner's Office and the Swiss Federal Data Protection and Information Commissioner.

8. How can you contact us?

If there are any questions or concerns regarding this Privacy Notice, please contact our DPO as follows:

- by email: María Carrillo, LegalCompliance@artificial-solutions.com
- by post: Artificial Solutions, DPO, María Carrillo, Stureplan 15, 2nd floor, 111 45 Stockholm, Sweden.

9. Which version of this Privacy Notice applies?

This Privacy Notice is written in English and may be translated into other languages. In the event of any inconsistency between the English version and the translated version of this notice, the English version shall prevail.

We reserve the right to change our Privacy Notice from time to time. If we add any different purpose of those included here, we will notify you and ask for your acceptance. If we decide to any other changes to this Notice change our Privacy Notice, we will update it directly in our websites.

[May 2022]